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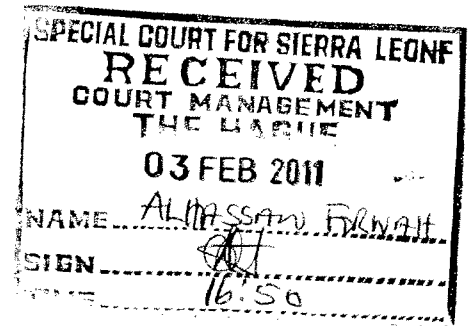
**SPECIAL COURT FOR SIERRA LEONE  
OFFICE OF THE PROSECUTOR**

**TRIAL CHAMBER II**

Before: Justice Teresa Doherty, Presiding  
Justice Richard Lussick  
Justice Julia Sebutinde  
Justice El Hadji Malick Sow, Alternate Judge

Registrar: Ms. Binta Mansaray

Date filed: 3 February 2011



**THE PROSECUTOR**

**Against**

**Charles Ghankay Taylor**

Case No. SCSL-03-01-T

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**PUBLIC WITH CONFIDENTIAL ANNEXES A TO E & PUBLIC ANNEX F**

**URGENT PROSECUTION MOTION FOR AN INVESTIGATION INTO CONTEMPT OF THE  
SPECIAL COURT FOR SIERRA LEONE**

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Office of the Prosecutor:

Ms. Brenda J. Hollis  
Ms. Leigh Lawrie  
Mr. Nathan Quick

Counsel for the Accused:

Mr. Courtenay Griffiths, Q.C.  
Mr. Terry Munyard  
Mr. Morris Anyah  
Mr. Silas Chekera  
Mr. James Supuwood

## I. INTRODUCTION

1. The Prosecution files this motion pursuant to Rules 54, 73 and 77 of the Rules of Procedure and Evidence (“**Rules**”) to request that the Trial Chamber direct the Registrar to appoint experienced independent counsel to urgently investigate possible contempt of the Special Court for Sierra Leone (“**the Court**”) in relation to, at minimum, four Prosecution witnesses: Mohamed Bereteh Kabba (TF1-568), Aruna Gbonda (TF1-330) and two protected witnesses.<sup>1</sup> Such allegedly contemptuous conduct includes:
  - (a) disclosure of information in violation of protective measures issued by this Court, including the identity and other information concerning at least two protected witnesses; and
  - (b) intimidation, bribery, or other interference with at least three Prosecution witnesses.<sup>2</sup>
2. The Prosecution has endeavoured to bring these serious allegations to the Trial Chamber’s prompt attention. The Prosecution was first made aware of the allegations by Kabba on 27 January 2011.<sup>3</sup> Thereafter, Prosecution investigators travelled to take Kabba’s statement. They then contacted, interviewed and took statements from two other witnesses also subjected to the above conduct. The finalised statements were provided to the team in The Hague on 2 February 2011, hence this motion is now being filed at the earliest opportunity. Due to the serious nature of the allegations and the fact that they provide evidence of a concerted course of action being taken against Prosecution witnesses in Sierra Leone, and indicate that similar action may be occurring in Liberia,<sup>4</sup> this motion is filed on an urgent basis. Accordingly, the Prosecution requests an expedited filing schedule.
3. The Prosecution underlines that notwithstanding the serious nature of the allegations, as contempt is an ancillary and collateral matter, any resulting filings and/or investigation should not result in any delay to the current proceedings.

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<sup>1</sup> The witnesses’ identities and relevant applicable protective measures ordered by this Court are more fully set out in **Confidential Annex A**.

<sup>2</sup> Full details of this conduct are provided in **Confidential Annexes B–D**.

<sup>3</sup> See **Confidential Annex E**.

<sup>4</sup> **Confidential Annex B**, p. 2.

## II. APPLICABLE LAW

### 4. This Court:

“must possess the powers necessary to enable [it] to administer and deliver justice fairly and efficiently. ... The power to investigate and punish what is generically ... described as “contempt of court” can only be used against those whose actions are calculated to obstruct the court’s task of getting at the truth.”<sup>5</sup>

5. In accordance with the foregoing, Rule 77 provides this Court with the power to deal with conduct that interferes with its administration of justice. The possession of such inherent power is also established by the jurisprudence of this Court<sup>6</sup> and the International Tribunals.<sup>7</sup>
6. Rule 77(A) provides a non-exhaustive list of the forms of contempt that may be punishable under Rule 77, including disclosure of “information relating to proceedings in knowing violation of an order of a Chamber”<sup>8</sup> and conduct that “threatens, intimidates, causes injury or offers a bribe to, or otherwise interferes with, a witness who is giving, has given, or is about to give evidence in proceedings before a Chamber, or a potential witness.”<sup>9</sup> Rule 77(B) further provides that any incitement or attempt to commit any such acts is also punishable as contempt.
7. The threshold required to initiate investigations into contempt under Rule 77(C) is that the Chamber “has *reason to believe* that a person may be in contempt.”<sup>10</sup> This standard is reason to believe that a person *may* have engaged in such conduct. There is no required showing that the person *has* engaged in the alleged act, in knowing or willing violation of

<sup>5</sup> *Prosecutor v. Brima et al.*, SCSL-04-16-AR77-315, Decision on Defence Appeal Motion Pursuant to Rule 77(J) on both the Imposition of Interim Measures and an Order Pursuant to Rule 77(C)(iii), 23 June 2005 (“**AFRC Appeal Decision**”), para. 2.

<sup>6</sup> See the AFRC Appeals Decision, para. 2; *Prosecutor v Brima et al*, SCSL-2004-16-T, “Decision on the Report of the Independent Counsel pursuant to Rules 77 (C) iii and 77 (D) of the Rules of Procedure and Evidence”, 29 April 2005, page 2; and *Prosecutor v Norman et al*, SCSL-04-14-T-450, Confidential – Decision on Motion for the Immediate Cessation of Violations of the Orders on Protective Measures for Witnesses and for Contempt, 25 July 2005, paras. 13-14.

<sup>7</sup> See for example *Prosecutor v. Marijacic and Rebic*, IT-95-14-R77.2, Judgement, 10 March 2006, para. 13, referring to *Prosecutor v. Tadić*, Case No. IT-94-1-A-R77, Judgment on Allegations of Contempt against Prior Counsel, Milan Vujin, 31 January 2000, para. 13; *Prosecutor v. Aleksovski*, Case No. IT-95-14/1-AR77, Judgment on Appeal by Anto Nobile against Finding of Contempt, 30 May 2001, para. 36.

<sup>8</sup> See Rule 77(A)(ii).

<sup>9</sup> See Rule 77(A)(iv).

<sup>10</sup> AFRC Appeals Decision, para. 17 (emphasis added). The Appeals Chamber stated that this standard is a different and lower standard than that of a *prima facie* case. See also *Prosecutor v. Taylor*, SCSL-03-01-T-600, Confidential Decision on Prosecution Motions for Investigations into Contempt of the Special Court for Sierra Leone (SCSL-03-01-451; SCSL-03-01-452; SCSL-03-01-457; SCSL-03-01-513), 19 September 2008 (“**September 2008 Contempt Decision**”), para. 7.

Rule 77. The elements of each specific act enumerated under Rule 77(A) and Rule 77(B), including *mens rea* and *actus reus*, are issues to be developed during the investigation in order to determine whether to proceed against a person or persons for contempt of court. Further, an allegation must be credible and a party has a duty to bring alleged misconduct to the attention of the Trial Chamber without undue delay.<sup>11</sup>

8. According to Rule 54, the Chamber “may issue such orders, summonses, subpoenas, warrants and transfer orders as may be necessary for the purposes of an investigation or for the presentation or conduct of the trial.” Orders for an investigation into contempt of Court are, therefore, also covered under this general Rule.

### III. BACKGROUND

9. The facts recounted below are a summary of the alleged contemptuous conduct engaged in by Eric Koi Senessie and Prince Taylor in relation to four Prosecution witnesses. While only three witnesses were actually contacted, the identity of a fourth Prosecution witness (TF1-516) has been revealed in breach of protective measures ordered by this Chamber.<sup>12</sup> Full details of the allegations are provided in three signed statements set out in **Confidential Annexes B,<sup>13</sup> C, and D** and the related declaration set out in **Confidential Annex E.**<sup>14</sup>
10. Between 26 and 31 January 2011, three Prosecution witnesses were contacted by telephone and in person by former RUF combatant Eric Koi Senessie. On 30 January, one of the witnesses was contacted simultaneously by Senessie in person and by Prince Taylor by telephone. The three witnesses are Mohamed Kabba (TF1-568), Aruna Gbonda (TF1-330) and protected witness TF1-585.<sup>15</sup> According to TF1-585, Prince Taylor confirmed that he provided TF1-585’s name to Senessie. Prince Taylor also admitted knowing that his conduct violated court orders.<sup>16</sup> According to their statements, Senessie told each witness independently that he had been sent by the Charles Taylor Defence team to persuade four

<sup>11</sup> AFRC Appeals Decision, para. 2; September Contempt Decision, para. 16.

<sup>12</sup> Details of the relevant protective measures applicable to the witnesses mentioned in the statements provided in the annexes hereto are set out in **Confidential Annex A.**

<sup>13</sup> Note the statement contained in **Confidential Annex B** contains certain minor typographical errors: “Bereteh” is erroneously spelt “Beretay” and “Gbonda” is erroneously spelt “Gonda”.

<sup>14</sup> Annexes B to E are provided confidentially as they include details of protected witnesses.

<sup>15</sup> Full details of the protective measures applicable to Kabba and TF1-585 are provided in **Confidential Annex A.** Note while Kabba testified openly certain residual protective measures still apply. No protective measures remain for Gbonda.

<sup>16</sup> **Confidential Annex D**, p. 3.

identified Prosecution witnesses<sup>17</sup> to, first, recant their previous sworn testimony, and second, testify before this Chamber that their previous sworn testimony was given based on the promise of money and relocation.<sup>18</sup> In exchange for recantation and/or further testimony, Senessie told Kabba and TF1-585 that the Defence would give a “good cash reward” or “huge financial benefit” to cooperating witnesses.<sup>19</sup> If these witnesses were cooperative, Senessie told them that he would contact the Defence Team who would then arrange to meet with the witnesses.<sup>20</sup> Senessie explained to Kabba that these efforts were aimed at securing Taylor’s acquittal or a minimal sentence.<sup>21</sup> As both Kabba and TF1-585 were surprised at being contacted by Senessie, they took evasive measures to bring their initial meeting with him to an end, advising they needed more time to consider the request.<sup>22</sup> However, their next actions were to either make contact with the OTP or to try to make such contact.<sup>23</sup> As evidenced by their statements, neither intended to change their testimony.<sup>24</sup> As regards Gbonda, despite this witness refusing to recant his previous testimony, Senessie persisted in trying to contact Gbonda in person and by telephone on 31 January 2011.<sup>25</sup> Senessie also lied to Kabba, telling him that Gbonda had agreed to change his evidence.<sup>26</sup>

11. On 30 January 2011, three days after Senessie’s initial contact with TF1-585, Senessie, in effect an agent of the Defence, attempted to have this protected witness sign a document declaring that the witness consented to meeting with the Defence.<sup>27</sup> Moreover, at this meeting, TF1-585 also spoke to Prince Taylor, a member of the Defence Team who instructed Senessie on the telephone.<sup>28</sup>
12. Neither Kabba nor TF1-585, who are both still subject to protective measures governing

<sup>17</sup> As detailed in **Confidential Annexes B-D**, the four witnesses identified were Kabba, Gbonda and two protected witnesses, TF1-585 and TF1-516.

<sup>18</sup> **Confidential Annex B**, p. 1; **Confidential Annex C**, p. 1; and **Confidential Annex D**, pp. 1-2.

<sup>19</sup> **Confidential Annex B**, p. 1; and **Confidential Annex D**, p. 2.

<sup>20</sup> **Confidential Annex B**, p. 2; and **Confidential Annex D**, pp. 1-2.

<sup>21</sup> **Confidential Annex B**, p. 1.

<sup>22</sup> **Confidential Annex B**, pp. 2-3; and **Confidential Annex D**, p. 2.

<sup>23</sup> The day after Kabba was first contacted by Senessie (i.e. on 27 January 2011), Kabba contacted OTP investigators to inform them about the contact (see **Confidential Annex E**). TF1-585 also wished to contact OTP and WVS but was unable to do so immediately as their contact details had been lost with the loss of a telephone (see **Confidential Annex D**, p. 2).

<sup>24</sup> **Confidential Annex B**, pp. 2-3; and **Confidential Annex D**, pp. 2-3.

<sup>25</sup> **Confidential Annex C**, pp. 1-2.

<sup>26</sup> **Confidential Annex B**, p. 2.

<sup>27</sup> **Confidential Annex D**, p. 3.

<sup>28</sup> **Confidential Annex D**, p. 3.

Defence contact,<sup>29</sup> received any notification or request from WVS or the Prosecution in relation to the contact made by Senessie and/or Prince Taylor. Indeed, in Prince Taylor's conversation with TF1-585 he admitted that he had no right to speak directly to the protected witness without going through the "formal channel, but they just have to do it."<sup>30</sup>

13. **Confidential Annexes B, C and D** all indicate that Senessie told Kabba, Gbonda and TF1-585 that he was acting on instructions from, and on behalf of, the Charles Taylor Defence Team. According to the Prosecution's information, Senessie is not an official Defence team member, but Prince Taylor is a Defence Team member.<sup>31</sup> As a member of the Defence Team, Prince Taylor, in addition to being bound by all court orders, also signed a Confidentiality Agreement which is attached at **Annex F**.
14. Finally, all three witnesses contacted by Senessie state that they feel these visits pose a threat to their well-being.<sup>32</sup> Two of them specifically state they now fear for their lives.<sup>33</sup>

#### IV. ARGUMENT

15. There is "reason to believe" that Eric Senessie, Prince Taylor and other persons not yet identified have engaged in contemptuous conduct in violation of Rules 77(A) and/or 77(B).<sup>34</sup> In addition to the detailed allegations set out in the annexes hereto, the Prosecution also highlights the following matters.
16. First, as set out above, both the witnesses and the Prosecution have reported the allegedly contemptuous conduct in a timely manner. The Prosecution has acted expeditiously to

<sup>29</sup> See details in **Confidential Annex A**.

<sup>30</sup> **Confidential Annex D**, p. 3.

<sup>31</sup> For confirmation of Prince Taylor's position as a member of the Defence Team, see Confidential Exhibits D-475(B) and D-476. See also, *Prosecutor v. Taylor*, SCSL-03-01-T, Trial Transcript, 25 February 2008, p. 4717 (where Defence Counsel clarifies that Prince Taylor is a "defence investigator for our team"). Moreover, several prosecution witnesses identified Prince Taylor as their initial contact in relation to testifying for the Defence. e.g. *Prosecutor v. Taylor*, DCT-299, Trial Transcript, 23 June 2010, pp. 43272-3; DCT-190, Trial Transcript, 25 June 2010, pp. 43439-41; DCT-102, Trial Transcript, 3 November 2010, pp. 48632-6 & 8 November 2010, pp. 48953-6. Two other Defence witnesses also identified Prince Taylor as their initial contact in relation to this case, however, they did so in Private Session.

<sup>32</sup> **Confidential Annex B**, p. 3; **Confidential Annex C**, p. 2; and **Confidential Annex D**, pp. 1-2.

<sup>33</sup> **Confidential Annex C**, p. 2; and **Confidential Annex D**, p. 2.

<sup>34</sup> This Chamber previously considered the following factors relevant in determining, in its discretion, whether the "low evidentiary threshold" required by the "reason to believe" standard under Rule 77(A) was satisfied: September 2008 Contempt Decision, paras. 15-18, 25 (the length of time elapsed between the conduct and the witness report to the Prosecution and in turn, the length of time between the witness report and the filing of the motion requesting an investigation); para. 24 (whether a link is tenuous or direct; whether based on hearsay; consistencies between statements regarding the same or similar conduct); paras. 30, 34 (whether protective measures were in place at the time of the alleged conduct); para. 31 (whether intimidation amounts to more than mere advice or discussion); and para. 35 (conduct must arise out of the witness's testimony in the proceedings).

obtain statements from the witnesses and file this motion requesting an investigation.

17. Moreover, the signed statements contained at **Confidential Annexes B, C, and D** are based on the first hand experiences of the contact and conduct attributable to Senessie and Prince Taylor. The accounts also in large part corroborate each other, particularly in relation to the tactics employed, the bribes suggested, the information disclosed and the motivations underlying Senessie's conduct. Additionally, all three statements were made under affirmation, thus each witness has acknowledged and understands the implications of giving false information.
18. Consequently, the evidentiary threshold for the "reason to believe" standard has been met. The allegedly contemptuous conduct engaged in by Eric Senessie, Prince Taylor and others not yet identified is set out below.

DISCLOSURE OF INFORMATION IN KNOWING VIOLATION OF AN ORDER (RULE 77(A)(II))

19. The information set out above and in **Confidential Annexes B, C and D** provides reason to believe that the investigation, if directed, would reveal that there has been disclosure of the identity of at least two protected Prosecution witnesses to third parties including Eric Senessie in knowing violation of the applicable protective measures orders.<sup>35</sup> Senessie also disclosed the identity(ies) of protected witness(es) to the three witnesses he contacted in knowing violation of the applicable protective measures orders. Therefore, the allegations give reason to believe that the identities of TF1-585 and TF1-516 have been disclosed in violation of the protective measures ordered. This conduct falls within the ambit of Rule 77(A)(ii).

INTIMIDATION AND/OR OFFERS TO BRIBE A WITNESS (RULE 77(A)(IV) & RULE 77(B))

20. There is reason to believe, on the basis of the information set out above and in **Confidential Annexes B, C and D** that Eric Senessie, Prince Taylor and other persons not yet identified intimidated or attempted to intimidate at least three Prosecution witnesses and attempted to bribe at least two Prosecution witnesses. This conduct falls within the ambit of Rule 77(A)(iv) and/or Rule 77(B).
21. In exchange for the recantation of sworn testimony and/or further testimony, Kabba and TF1-585 were told they would be rewarded monetarily.<sup>36</sup> Senessie told the witnesses that he could arrange a meeting with the Defence at which financial "reward" would be

<sup>35</sup> The protective measures applicable to TF1-585 and TF1-516 are set out in **Confidential Annex A**.

<sup>36</sup> See **Confidential Annexes B & D**.

- discussed in exchange for their recantation or testimony.
22. Moreover, all three witnesses confirmed that Senessie's contact and conduct made them feel afraid. This conduct included a persistent, "urgent," "desperate," and "eager" Defence Team allegedly instructing Senessie to "persuade" witnesses. Indeed, Senessie attempted to visit all three witnesses several times.
  23. Any of these factors, taken alone or together, indicate that there is reason to believe that at least three Prosecution witnesses were intimidated (or attempts were made to intimidate them) and attempts were made to bribe at least two witnesses in violation of Rule 77(A)(iv) and/or Rule 77(B).

VIOLATION OF COURT ORDERS AND OTHERWISE INTERFERING WITH A WITNESS (RULE 77(A), RULE 77(A)(IV) & RULE 77(B))

24. There is reason to believe that, based on the information contained in **Confidential Annexes B, C and D** that Eric Senessie, Prince Taylor and others not yet identified interfered or attempted to interfere with the administration of justice contrary to Rules 77(A) and/or (B) and interfered or attempted to interfere with witnesses who have given evidence in proceedings before this Court contrary to Rule 77(A)(iv) and/or Rule 77(B).
25. On the issue of compliance with an order of this Court, the *Samura* Judgement confirmed the findings in *Milosević* that, "it is an obvious consequence of refusing to comply with an order of the Chamber that the administration of justice is interfered with."<sup>37</sup> Therefore, breaches of certain types of protective measures orders are encompassed by Rule 77(A).<sup>38</sup> As regards Rule 77(A)(iv), there are various forms of conduct that may give rise to the offence of "otherwise interfering with the witness" including conduct that is of a similar gravity to intimidation that equally seeks "to influence the outcome of a pending case by interfering with a witness or potential witness. [...] It is not necessary for the Prosecution to prove that the witness was actually deterred or influenced."<sup>39</sup>
26. Accordingly, by the conduct described above and in the attached annexes Senessie, Prince

<sup>37</sup> *Independent Counsel v. Samura*, SCSL-05-01-18, Judgement in Contempt Proceedings, 26 October 2005 ("*Samura Judgement*"), para. 26 referring to *Prosecutor v. Milosević*, IT-02-54-R77.4, Contempt Proceedings against Kosta Bulatovic, Decision on Contempt of the Tribunal, 13 May 2005, para. 17.

<sup>38</sup> As noted in the *Samura* Judgement, Rule 77(A) is descriptive but not exhaustive of the acts which might be considered contempt (para. 16). The Prosecution acknowledges that disclosure of witness information in violation of court orders falls specifically under Rule 77(A)(ii), however, other violations of court orders, particularly other court-ordered protective measures relating to the formal procedures by which contact can be made with a Prosecution witness by the Defence may fall under Rule 77(A) generally.

<sup>39</sup> *Prosecutor v. Brđanin*, IT-99-36-R77, "Decision on Motion for Acquittal pursuant to Rule 98bis concerning allegations against Milka Maglov", 19 March 2004, para. 28.



Taylor and other persons not yet identified interfered or attempted to interfere with the administration of justice and with at least three witnesses who have given testimony before this Court.

27. Further, Prince Taylor himself admitted that direct contact with a protected witness was in violation of that witness's "rights."<sup>40</sup> Neither of the two witnesses who remain subject to protective measures governing Defence contact (i.e. Kabba and TF1-585) were notified of or gave consent to contact by the Defence. Such contact, absent permission of the Prosecution or Court order, is in direct violation of the applicable protective measures.<sup>41</sup> To the extent the Prosecution at any time took the view that it would be adequate for the Defence to seek to contact witnesses through WVS rather than the Prosecution, the Prosecution is no longer of that view. Where the protective measure in place requires contact to be made through the Prosecution or by Court order, that is the procedure which should be followed. In any event, there is no indication that WVS was used as a conduit to obtain consent from these witnesses.
28. Therefore, all interference with witnesses, whether through violation of court orders or otherwise, insofar as such interferences are attempts to influence the outcome of this pending case,<sup>42</sup> falls within the ambit of Rule 77(A) and/or Rule 77(B) and warrants investigation.

URGENT INTERIM MEASURE

29. Pending an investigation into the alleged conduct, the Prosecution requests that this Trial Chamber order the Defence Team not to discuss with Eric Senessie and/or Prince Taylor anything associated with this request or resulting investigation. Senessie and Taylor are those thus far specifically implicated in the allegedly contemptuous conduct. **Confidential Annexes B, C and D** all indicate that Senessie may be acting on instructions from, and on behalf of, the Charles Taylor Defence Team. Further, Prince Taylor is a Defence Team member. Therefore, considering that communication and contact between Senessie and Prince Taylor and the Defence Team is possible, if not probable, an interim order forbidding discussion is necessary to prevent the possibility of improper conduct in anticipation of, and during, any investigation ordered.

<sup>40</sup> **Confidential Annex D**, p. 3.

<sup>41</sup> See **Confidential Annex A**.

<sup>42</sup> See **Confidential Annex B**, p. 1.

V. CONCLUSION

30. On the basis of the above and the information provided in the attached confidential and public annexes, there is reason to believe that Eric Senessie, Prince Taylor, and others not yet identified may have been involved in contemptuous conduct in contravention of Rules 77(A) and 77(B) including:
- (a) disclosure of information in violation of protective measures issued by this Court, including the identity and other information concerning protected witnesses; and
  - (b) intimidation, bribery, or other interference, including contact in violation of a court order, with witnesses who have given evidence in proceedings before this Chamber.
31. Accordingly, pursuant to Rule 77(C)(iii) the Prosecution requests that the Trial Chamber direct the Registrar to appoint an experienced independent counsel to urgently investigate the above described possible contempt of this Court.

Filed in The Hague,

3 February 2011

For the Prosecution,



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Brenda J. Hollis

The Prosecutor

## INDEX OF AUTHORITIES

### SCSL Cases

SCSL Rules of Evidence and Procedure

#### *Prosecutor v. Taylor, Case No. SCSL-03-01-T*

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Confidential Exhibit D-475(B)

Confidential Exhibit D-476

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*Prosecutor v. Brđanin*, IT-99-36-R77, Decision on Motion for Acquittal pursuant to Rule 98bis concerning allegations against Milka Maglov, 19 March 2004  
<http://www.un.org/icty/brdjanin/trialc/decision-e/040319.htm>



SPECIAL COURT FOR SIERRA LEONE  
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Court Management Section – Court Records

**CONFIDENTIAL DOCUMENT CERTIFICATE**

This certificate replaces the following confidential document which has been filed in the Confidential Case File.

Case Name: **The Prosecutor – v- Charles Ghankay Taylor**  
Case Number: **SCSL-03-01-T**  
Document Index Number: **1185**  
Document Date: **03 February 2011**  
Filing Date: **03 February 2011**  
Document Type: **Confidential Annexes A to E**  
Number of Pages: **18** Number from: **32453 – 32470**

- Application
- Order
- Indictment
- Motion**
- Response
- Correspondence

Document Title:

**Public with confidential Annexes A to E and public Annex F urgent  
Prosecution motion for an investigation into contempt of the Special Court for  
Sierra Leone**

Name of Officer:

Alhassan Fornah

Signed:

32471

**PUBLIC ANNEX F**

Confidentiality Agreement for Member of the Defence Team,  
Prince Lawrence Taylor, dated 25 September 2007

Declaration by Member of the Charles Taylor Defence Team

The undersigned member of the defence of Charles Ghankay Taylor at the Special Court for Sierra Leone sitting in The Hague, The Netherlands, hereby confirms that he understands and is aware of his obligations to observe the standards and orders of the Court, including the 5 May 2006 Decision by Trial Chamber II regarding protective measures and the obligation to protect the confidentiality of non-public documents and the information contained therein.

Signature: 

Name: Prince Lawrence Taylor

Date: 25th Sept., 2007.