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SCSL-12-02-PT
(417-441)

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THE SPECIAL COURT FOR SIERRA LEONE

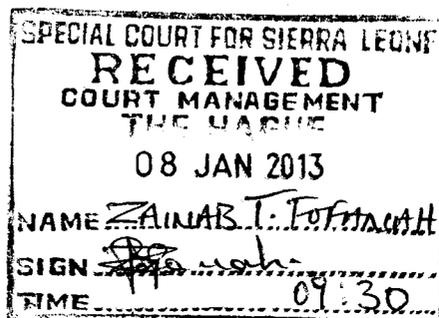
Trial Chamber II

Before: Justice Teresa Doherty, Single Judge

Registrar: Ms. Binta Mansaray

Date: 7 January 2013

Case No.: SCSL-12-02-PT



INDEPENDENT COUNSEL

v.

PRINCE TAYLOR

PUBLIC,

WITH PUBLIC ANNEX B AND CONFIDENTIAL ANNEXES A AND C

ANSWERS TO QUESTIONS POSED BY INDEPENDENT COUNSEL PURSUANT TO
SINGLE JUDGE'S DECISION ON
INDEPENDENT COUNSEL'S SECOND MOTION FOR *SUBPOENA AD TESTIFICANDUM*

Independent Counsel:
Mr. William L. Gardner

Counsel for the Accused:
Mr. Rodney Dixon

Interested Parties:

Mr. Courtenay Griffiths, QC
Ms. Logan Hambrick

I. INTRODUCTION

1. On 4 January 2013, Independent Counsel filed a list of questions, which he requested Courtenay Griffiths, QC and Logan Hambrick (“Interested Parties”) to answer in relation to the case of *Independent Counsel v. Prince Taylor*.¹ The Independent Counsel further requested that the Interested Parties submit their responses within 48 hours.² The Interested Parties indicated to the Court and Independent Counsel via email that this deadline was unrealistic given other professional commitments; the Parties have endeavoured to file their response(s) herein as expediently as possible.
2. At the request of the Interested Parties,³ Independent Counsel has clarified that neither Griffiths nor Hambrick are suspects in the matter. He stated:

First, the Independent Counsel wishes to clarify that he is not accusing the Interested Parties of participating in any criminal activity. The Independent Counsel did not make such accusations in its Second Motion for Subpoenas ad Testificandum and does not have any evidence suggesting their involvement in such activity.⁴

II. SUBMISSIONS

Preliminary Objection – Interested Parties cannot speak on behalf of entire team

3. The Interested Parties recall that the premise of Independent Counsel’s initial request was that subpoenas were warranted because Griffiths and Hambrick could provide “highly relevant evidence regarding Defendant Prince Taylor’s unlawful efforts to contact

¹ *Independent Counsel v. Prince Taylor*, SCSL-12-02-PT-40, Questions for Courtenay Griffiths, QC and Logan Hambrick pursuant to the Decision on Independent Counsel’s Second Motion for Subpoenas ad Testificandum, 4 January 2013 (“List of Questions”).

² List of Questions, para. 10.

³ *Independent Counsel v. Prince Taylor*, SCSL-12-02-PT-38, Submissions in Compliance with Single Judge’s Decision on Independent Counsel’s Second Motion for Subpoenas ad Testificandum, 2 January 2013, paras 7-8.

⁴ *Independent Counsel v. Prince Taylor*, SCSL-12-02-PT-39, Response to Submissions in Compliance with Single Judge’s Decision on Independent Counsel’s Second Motion for Subpoenas ad Testificandum, 2 January 2013, paras 7-8.

⁴ *Independent Counsel v. Prince Taylor*, SCSL-12-02-PT-39, Response to Submissions in Compliance with Single Judge’s Decision on Independent Counsel’s Second Motion for Subpoenas ad Testificandum, 3 January 2013.

Charles Taylor prosecution witnesses and influence Eric Senessie to assert an untruthful defence as to those witnesses”.⁵ The Independent Counsel alleged that the Interested Parties are in a “unique position to address the questions presented”.⁶ Logic suggests, given the direct request to the Interested Parties, that the Independent Investigator appreciates that members of the team have discreet and distinct responsibilities and should consequently be required to speak on their own behalf. This has to be the reasonable conclusion from his specific request for subpoenas for the two. Otherwise the Independent Counsel would have directed these questions to all members of the team rather than be selective. Yet, for some reason, Independent Counsel has clearly singled out the Interested Parties alone for interview.

4. The Interested Parties therefore object to being asked to answer questions on behalf of members of the entire Charles Taylor Defence Team. At all times during the investigation of his case, Independent Counsel could have approached each and every member of the former Defence Team had he wished to elicit evidence from them. Instead, at para 3(A) of his filing containing the List of Questions, Independent Counsel effectively asks Griffiths and Hambrick to speak for all members of the Defence Team:

3. For the purposes of interpreting or construing the questions below, all terms should be given their most expansive and inclusive interpretation. The following terms are defined as follows: (A) “You” and “Your”. The terms “You” and “Your” refer to any and all members of the Charles Taylor defence team, including the Interested Parties.

5. In addition to this not being an effective way of investigating, the approach requested by Independent Counsel is not practically tenable. For whereas, Griffiths accepts that by reason of his role as Lead Counsel for the accused Charles Taylor, he bore certain overall responsibilities for the conduct of the defence team, such responsibility cannot extend, in the circumstances of this inquiry, to speaking on behalf of all members of the team. Hambrick had limited responsibilities and was simply not in a position to know what every member of the team was or was not doing.

⁵ *Independent Counsel v. Prince Taylor*, SCSL-12-02-PT-25, Independent Counsel’s Second Motion for Subpoenas ad Testificandum, 4 December 2012 (“Motion”), para. 1.

⁶ Motion, para. 24.

6. The Interested Parties are therefore not able (in that they lack the requisite knowledge) to answer these questions on behalf of anyone but themselves. Therefore, in respect of all of the questions below, Griffiths will answer for himself and Hambrick will answer for herself, alone.

Preliminary Objection – Professional Privilege

7. The Interested Parties have answered the questions posed to the fullest extent they feel possible given the constraints of professional privilege that arise from their representation of Charles Taylor. The Interested Parties do not claim any professional privilege with respect to Prince Taylor; neither Griffiths nor Hambrick ever represented Prince in any capacity.
8. Griffiths reiterates the observations made in his email of 18 October that in his view many of the questions engage Legal Professional Privilege. Under the relevant law which governs his practice as a barrister in the Courts of England and Wales, a client may, and his legal advisor MUST (subject to the client's waiver), refuse to give oral evidence or to produce documents relating to two types of confidential communication:
 - (1) Communications between the client and his legal adviser made for the purpose of enabling the client to obtain or the adviser to give legal advice about any matter, whether or not litigation was contemplated at the time; and
 - (2) Communications between the client or his legal adviser and third parties, the sole or dominant purpose of which was to enable the legal adviser to advise or act in relation to litigation that was pending or in the contemplation of the client.
9. The privilege also covers items enclosed with or referred to in such communications and brought into existence: in connection with the giving of legal advice, or in connection with or in contemplation of legal proceedings and for the purposes of such proceedings.

10. Griffiths notes that in *R (Morgan Grenfell & Co. Ltd v Special Commissioner of Income Tax* [2003], 1 AC 563, Lord Hoffmann said at [7]-[8]:

“Legal professional privilege is a fundamental human right long-established in the common law. It is a necessary corollary of the right of any person to obtain skilled advice about the law. Such advice cannot be effectively obtained unless the client is able to put all the facts before the advisor without fear that they may afterwards be disclosed and used to his prejudice.... It has been held by the European Court of Human Rights to be part of the right of privacy guaranteed by [The European Convention on Human Rights] Article 8... the courts will ordinarily construe general words in a statute, although literally capable of having some startling or unreasonable consequence, such as overriding fundamental human rights, as not having been intended to do so. An intention to override such rights must be expressly stated or appear by necessary implication.”

11. Hambrick is a member of the New York Bar and is bound by Rule 1.6 of the state’s Rules of Professional Conduct, which deals with the Confidentiality of Information.⁷ Rule 1.6 states that “confidential information” consists of information gained during or relating to the representation of a client, whatever its source, that is (a) protected by the attorney-client privilege, (b) likely to be embarrassing or detrimental to the client if disclosed, or (c) information that the client has requested by kept confidential. Such confidential information shall not knowingly be revealed, or used to the disadvantage of the client or for the advantage of a third person, unless it falls into a limited category of exceptions, one of which is the consent of the client.

12. In light of this jurisprudence, the Interested Parties note that in the Independent Counsel’s initial request for assistance, directed to Hambrick on 17 October 2012, the Independent Counsel limited his inquiry to the following areas:

- The Order in Lieu of Indictment [that Independent Counsel] sent you, including but not limited to Paragraph 6 with respect to the 12/17/2010 Defence Motion to Recall;

⁷ The entirety of the New York Rules of Professional Conduct and explanatory comments (as amended in June 2011) can be found at:

[http://www.nysba.org/AM/Template.cfm?Section=Professional Standards for Attorneys&Template=/CM/ContentDisplay.cfm&ContentID=53625](http://www.nysba.org/AM/Template.cfm?Section=Professional_Standards_for_Attorneys&Template=/CM/ContentDisplay.cfm&ContentID=53625).

- Prince Taylor's employment with your team generally: the time periods, his general duties and responsibilities, and whom he reported to.
- Any post 12/31/2010 (when I understand he was no longer employed by the defence team) contact or conversations whether initiated by him or the team, any request on the team's part to contact any witnesses or potential witnesses and/or any statement on his part about contacting witnesses or potential witnesses.

13. It will be noted that the Independent Counsel now has a much more expansive List of Questions, the majority of which require that the Interested Parties disclose "...any communications between you and the Defendant". Defendant is not defined, but the Interested Parties nonetheless – for the avoidance of doubt - interpret this to mean the Defendant Prince Taylor, cognizant as we are of our obligations to Charles Taylor as outlined above.

III. ANSWERS TO INDEPENDENT COUNSEL'S LIST OF QUESTIONS

14. In respect of the questions posed by Independent Counsel, Griffiths and Hambrick provide the following answers, on their own behalf, to the best of their ability and recollection, and with due regard to professional privilege.

Answers in Respect of Period I: 1 November 2010 to 31 December 2010⁸

15. Griffiths answers as follows:

- **Questions 1-5 and 7:** I answer an emphatic "no", save that I received three emails from Prince Taylor providing details of information he had gleaned while on an investigation mission upcountry in mid-October 2010. He sent me one email on 25 October 2010 and two emails on 26 October, detailing the names of several prosecution witnesses and the circumstances of their relocation. These emails served as the genesis of the 17 December 2010 Motion to Recall Four

⁸ List of Questions, para. 6.

Prosecution Witnesses and to Hear Evidence from the Chief of WVS Regarding Relocation of Prosecution Witnesses. I forwarded these emails to my team and asked them to follow up with Prince on these investigative leads. I have not attached the emails themselves as the details provided therein are confidential work product stemming from my representation of Charles Taylor, which is protected by legal privilege. It will be noted that these emails fall outside the period of interest for the Independent Counsel, but I mention them nonetheless in an effort to assist.

- **Question 6:** The Taylor Defence team, from the money allocated to us by the Court, provided a \$250 monthly office-expenses allowance to each of the Freetown and Monrovia offices. This money was to be used by those working in the field offices to buy top-up cards or phone credit for themselves in order to contact witnesses, to subsidize work-related travel and transportation, to purchase necessary office supplies and equipment, or to cover any incidental witness expenses (such as drinks or snacks during a long interview). As logic would have it, the team no longer provided these office-expense allowances to former team members once their contracts with the Office of the Principal Defender expired on 31 December 2010.
- **Question 8:** The only communication I had with Prince Taylor during Period 1 was an email communication with him dated 11 November 2010, dealing with an issue that arose in court.⁹

16. Hambrick answers as follows:

- **Question 1:** Yes, I communicated with Prince concerning a prosecution witness from the Charles Taylor trial. I had noticed an article in *Sierra Express Media*, a public online Sierra Leonean newspaper. The article was titled “Witness Exposes Special Court Corruption”, wherein prosecution witness Samuel Kargbo made various complaints regarding his “protection” as promised by the Witness and Victims Section of the SCSL.¹⁰ I sent the link to this article to Prince by email on 12 November 2010 and asked if he had heard of Samuel Kargbo being promised relocation in exchange for testifying. I did not get a response.

Further, as a follow up to the emails Prince had sent to Griffiths in late October, Prince and I exchanged a series of emails between 6 December and 16 December

⁹ A copy of the communication is attached as Confidential Annex A.

¹⁰ A pdf copy of the article is attached as Public Annex B.

2010, regarding investigative findings he had made with respect to the relocation of prosecution witnesses. Prince said these findings were based on discussions he had with sources such as friends, neighbours and relatives of prosecution witnesses. Portions of these emails served as the basis of the affidavit he eventually made and signed, which was attached to the Recall Motion filed on 17 December 2010. I consider the details of those exchanges (ie, names of sources, names of prosecution witnesses investigated, information we had as to their relocation, etc) to be confidential information that is protected by professional privilege stemming from my representation of Charles Taylor. I can attest that at no time during those exchanges, did I ask Prince to contact any prosecution witnesses, nor did he suggest he intended to do so.

- **Question 2:** No, I did not ask Prince to approach or otherwise communicate with prosecution witnesses.
- **Question 3:** Yes, some communications between myself and Prince concerned the 17 December Recall Motion. See answer to Question 1.
- **Question 4:** No, none of the communications between myself and Prince concerned Eric Senessie.
- **Question 5:** No, none of the communications between myself and Prince concerned payments to Prince or Eric Senessie.
- **Question 6:** Yes, in mid-October and in line with team policy, I authorized Prince to pick up money (\$1500) from the SCSL Finance Office on my behalf. This money was to be split between and used by the Freetown and Monrovia offices for office expenses for the months of October, November and December 2010. I sent the money in bulk because by this point in time I was based in The Hague and not in Freetown, and so transferring money was more time-consuming and difficult. It should be noted that the date of the money transfer falls outside of the time period referred to by the Independent Counsel, but I make mention of it in order to assist the Court. As far as I know, this money was not used for any unlawful purpose.
- **Question 7:** No, none of the communications between myself and Prince concerned the issue of recantation of testimony of prosecution witnesses.
- **Question 8:** Yes, I exchanged emails with Prince between 9 and 12 November 2010 in relation to false accusations put to a defence witness by the prosecution

during cross-examination, to the effect that Prince had been a former RUF fighter. Several exhibits were admitted into evidence as a result of this exchange.¹¹

Answers in Respect of Period 2: 1 January 2011 to 7 February 2011¹²

17. Griffiths answers as follows:

- **Questions 9-19:** I answer an emphatic “NO”.
- **Question 20:** I sent an email on 4 January 2011 to Prince and other members of the team whose contracts with the Special Court had finished, thanking them for their assistance over the years.

18. Hambrick answers as follows:

- **Questions 9-20:** No.

Answers in Respect of Period 3: 7 February 2011 to 7 January 2013¹³

19. The Interested Parties recall that as of 25 February 2011, the Trial Chamber ordered them not to contact Eric Senessie, Prince Taylor or the prosecution witnesses mentioned in the pending contempt motion.¹⁴ The Interested Parties never breached this order.

20. Griffiths answers as follows:

- **Questions 21-28:** I answer an emphatic “NO”.

21. Hambrick answers as follows:

- **Questions 21-27:** No.
- **Question 28:** On 26 April 2012, on the morning of Judgement in the Charles Taylor case, I wrote to an email to Prince and other former investigators and

¹¹ Exhibits D-475 A, D-475 B (Conf), D-476 (Conf), D-477 A, D-477 B (Conf), D-478 A, and D-478 B (Conf).

¹² List of Questions, para. 7.

¹³ List of Questions, para. 8. The Interested Parties note that Independent Counsel only requested a time frame up until 3 January 2013, but in order to avoid all doubt, the Parties have extended their answers to cover the time period up until these answers are filed.

¹⁴ *Prosecutor v. Taylor*, SCSL-03-01-T-1218, Decision on Public with Confidential Annexes A to E & Public Annex F Urgent Prosecution Motion for an Investigation into Contempt of the SCSL and Public with Confidential Annexes A & B Urgent Prosecution Motion for an Investigation into Contempt of the SCSL, 25 February 2011.

witness management officers in Sierra Leone and Liberia thanking them for their assistance over the years, regardless of the outcome. I also wished those in Sierra Leone a happy independence day.

On 31 May 2012, I emailed Prince a copy of the Sentencing Judgement in the Charles Taylor case.

Answers in Respect of General Questions¹⁵

22. Griffiths and Hambrick respond to the general questions as follows below. Where there is a difference in response, this is clearly indicated.

- **Question 29:** The Principal Defender, whose office contracted Prince to work for our team, has provided the dates and terms of Prince's employment.¹⁶
- **Question 30:** Prince's duties as an investigator were to locate and interview witnesses who could give relevant and admissible evidence for the defence.
- **Question 31 (Griffiths):** I do recall being informed that certain prosecution witnesses had become disgruntled because of the Office of the Prosecutions failure to honour promises made to them. I recall being shown an extract from a Sierra Leonean newspaper to this effect. These matters were brought to my attention by the Defendant Prince Taylor as outlined in the emails mentioned at paragraph 15 above. Apart from this notification I was unaware of any communication between the Defendant and former prosecution witnesses from the Charles Taylor case.
- **Question 31 (Hambrick):** No, I cannot recall any communications between Prince and former prosecution witnesses for the Charles Taylor case, once those individuals were known to us as prosecution witnesses.
- **Question 32 (Griffiths):** To my recollection I first learnt of Eric Senessie when proceedings were issued against him for contempt.

¹⁵ List of Questions, para. ##.

¹⁶ See Email from Principal Defender, Ms. Carlton-Hanciles, dated 4 January 2013, attached as Confidential Annex C.

- **Question 32 (Hambrick):** I recall meeting Eric Senessie once, in Kailahun Town, in late 2006 or early 2007. I had travelled to Kailahun on an investigations mission with Prince. Our aim was to talk to potential defence witnesses or individuals who could help us assess the credibility of prosecution evidence. I cannot recall who first introduced us to Senessie. I remember that we were told Senessie had been a non-combat member of the RUF. I recall that we asked Senessie if he knew where we could find several former RUF members who were supposed to be based in the Kailahun area. He gave us some assistance in locating them. That is the one and only encounter or communication I have had with Senessie, in any capacity.
- **Question 33 (Griffiths):** To my recollection I first learnt of possible communications between the Defendant and Eric Senessie when information was brought to my attention as to certain comments made by the latter at his sentencing hearing. I cannot now recall the source of that information.
- **Question 33 (Hambrick):** Other than the exchange Prince and I had with Senessie on that occasion in Kailahun, I was not aware of any communication between Senessie and Prince, until I read the allegations contained in the contempt motion filed by the prosecution in February 2011. I never communicated with Prince or Senessie in any way to see if the communications actually occurred.
- **Question 34 (Griffiths):** I was never approached to defend either the Defendant or Eric Senessie. I refer also to the email of the Principal Defender on this point, attached at Confidential Annex B.
- **Question 34 (Hambrick):** At the Special Court, contempt allegations are always originally filed into whatever main case they are related to. It was the practice of the Taylor Defence Team to respond, at least in terms of making legal submissions on the face of the document, to any allegations of contempt raised by the prosecution, whether it implicated any current or former member of the team or not. We did this on several occasions.¹⁷ With respect to the initial prosecution

¹⁷ For example, *Prosecutor v. Taylor*, SCSL-03-01-T-479, Confidential Defence Response to Urgent Prosecution Motion for an Investigation into Contempt of the SCSL (SCSL-03-01-T-457), 21 April 2008; SCSL-03-01-T-480, Confidential Defence Response to Urgent Prosecution Motion for an Investigation into Contempt of the SCSL and for Urgent Interim Measures (SCSL-03-01-T-452), 21 April 2008; SCSL-03-01-T-481, Confidential Defence Response to Urgent Prosecution Motion for an Investigation into Contempt of the SCSL (SCSL-03-01-T-451), 21 April 2008; SCSL-03-01-T-528, Confidential Defence Response to Urgent Prosecution Motion for an Investigation into Contempt of the SCSL (SCSL-03-01-T-513), 2 June 2008; and SCSL-03-01-T-668, Confidential Defence Response to Prosecution Motion for an Investigation into Contempt of the SCSL and for Urgent Interim Measures (SCSL-03-01-T-662), 13 November 2008. The defence is sure that though these filings are confidential, the Single Judge could make these pleadings available to the Independent Counsel if necessary for purposes of this response.

motion against Prince and Senessie, there were also vague allegations by the prosecution with respect to the involvement of the defence team as a whole.¹⁸ Therefore, it was to be expected that the defence would respond to the allegations and to argue that they did not provide a “reason to believe” that a person may be in contempt of court, as per the language of Rule 77(C). We did not get far into the merits of the factual allegations because we were not in a position to conduct investigations, etc. Rather our response focused on matters of a legal nature. I did not communicate with Prince when drafting the team’s response.

- **Question 35:** We are aware of no misconduct by Prince Taylor.
- **Question 36 (Griffiths):** I have had no communication with anyone that has a relationship with the Defendant, including but not limited to Rodney Dixon. I have never spoken to the latter.
- **Question 36 (Hambrick):** I have not had any communication with anyone that has a relationship to Prince in relation to this matter; presumably that is what the Independent Counsel is asking. I do note that around September 2011, before this contempt case against Prince arose, I was introduced and spoke briefly to Rod Dixon at the International Criminal Court; he represents the Government of Kenya in relation to the Situation in Kenya, and I am working for the defence on the Kenya I case, which has been brought against William Ruto and Joshua Sang. I have not spoken to Rod Dixon about the matter at hand.

IV. CONCLUSION

23. The Interested Parties hope these answers assist the Chamber and Independent Counsel.

¹⁸ *Prosecutor v. Taylor*, SCSL-03-01-T-1185, Urgent Prosecution Motion for an Investigation into Contempt of the SCSL, 3 February 2011, para. 10 (it was alleged that Senessie told the prosecution witnesses that he had been sent by the Charles Taylor Defence team...), para. 13 (Senessie told the prosecution witnesses that he was acting on instructions from, and on behalf of, the Charles Taylor defence team), para. 15 (the Prosecution alleged that Eric Senessie, Prince Taylor and “other persons not yet identified” had engaged in contemptuous conduct).

Respectfully Submitted,



Courtenay Griffiths, Q.C.
Dated this 7th Day of January 2013
London, United Kingdom



Logan Hambrick
Dated this 7th Day of January 2013
Nairobi, Kenya

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Witness Exposes Special Court Corruption!

By: [SEM](#) on November 11, 2010.



A protected witness who testified against Charles Taylor in The Hague accused the Special Court of corruption excesses.

Samuel Kargbo, one time supreme council member of the Armed Forces Revolutionary Council (AFRC), and who, prior to his being flown to The Hague, was a protected witness, now has his face and name in VCD cassette allegedly produced by the Special Court.



In an interview with Samuel, he told this press that management of the Special Court included video recording of his and others testimonies into a video cassette now for sale to the public.

“The Special Court promised protecting all of us as witnesses. They asked us to testify as prosecution witnesses, but never told us they will produce a video on us,” angry Samuel said.

It could be recalled that Samuel and others have had understanding with management of Special Court relative to the protection of their lives after completion of testimonies.

It has reached this press that officials of the Special Court accept relocating witnesses to countries outside Sierra Leone.

That Samuel on several occasions had called on the head of WVS, Mr. Salim, asking him to cause his relocation as was agreed, but went fruitless.

Although agreement between the Special Court and witness Samuel was never documented, it was disclosed that a senior officer of the WVS section, Madam Adel, had previously told all the witnesses that they will be relocated to countries of their choice after conclusion of testimonies.

To Samuel's dismays, a video cassette showing footages of his testimony was put out for sale.

On the back of the cassette were words such as “Special Court for Sierra Leone – Outreach Press & Public Affairs” qualifying that management of the said court has knowledge to such.

The cassette also featured witnesses such as Bobson Sesay, Zigzag Manza (one of Charles Taylor's commanders), Abu Keita, Father Mario and others.

The video, according to Samuel, is now in public domain and has put their lives in serious threat.

“This is corruption. It is a complete sell out. The Special Court must be investigated for producing and selling a video without the earlier permission of persons featured,” Samuel angrily said.

Sources say the production of such a cassette must have come from the outreach section of the Special Court.

Facts as revealed disclosed how Samuel, on number occasions, had called on the attention of management of the Special Court to crosscheck the source of the already produced cassette, but gets no good feedbacks at all.

More details next edition.

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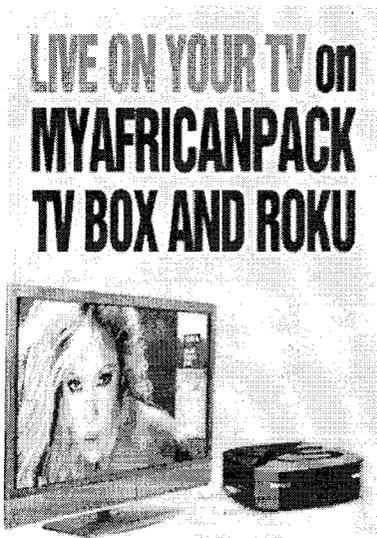
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Court Management Section – Court Records

CONFIDENTIAL DOCUMENT CERTIFICATE

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

Case Name: **The Prosecutor – v- Prince Taylor**
Case Number: **SCSL-12-02-PT**
Document Index Number: **042**
Document Date: **07 January, 2013**
Filing Date: **08 January, 2013**
Document Type: **Confidential Annexes A and C**
Number of Pages: **5**, Number from: **430-431 and 439-441**

- Application
- Order
- Indictment
- Other**
- Submission
- Correspondence

Document Title:

Public with public Annex B and confidential Annexes A and C Answers to Questions posed by Independent Counsel pursuant to Single Judge's decision on Independent Counsel's second motion for subpoena ad testificadum

Name of Officer:

Zainab T. Fofanah

Signed: 