SPECIAL COURT FOR SIERRA LEONE TRIAL CHAMBER I

Before: Hon. Justice, Benjamin Mutanga Itoe, Presiding

Hon. Justice Bankole Thompson Hon. Justice Pierre Boutet

Registrar: Mr. Herman Von Hebel

Date filed: 30th May 2008

THE PROSECUTOR

V.

ISSA HASSAN SESAY

Case No. SCSL-04-15-T

PUBLIC

Motion to Request the Trial Chamber to Hear Evidence Concerning the Prosecution's Witness Management Unit and its Payments to Witnesses

Office of the Prosecutor

Mr. Peter Harrison Mr. Reginald Fynn

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Mr. Wayne Jordash Ms. Sareta Ashraph

Defence Counsel for Morris Kallon

Mr. Charles Taku Mr. Orgetto Kennedy Ms. Tanoo Mylvanganam

Court-Appointed Counsel for Augustine Gbao

Mr. John Cammegh Mr. Scott Martin



I. INTRODUCTION

- 1. There is cogent evidence that the Prosecution is providing improper benefits and inducements ("payments") to witnesses in order to obtain testimony. The available evidence provides *prima facie* proof that the Prosecution's so-called Witness Management Unit ("WMU") provides witnesses with payments unrelated to legitimate, necessary, or appropriate witness expenses or security issues. The evidence is sufficiently cogent to provide proof that some of the payments are administered to witnesses to secure information, to ensure their "cooperation", and as reward for testimony that assists the Prosecution thus undermining the integrity of the RUF trial by inducing witnesses to provide false testimony against the Accused.
- 2. At a minimum, the *available* evidence shows that the payments, provided through the auspices of the WMU, are *ultra vires* the Statute of the Special Court ("Statute"), the Rules of Procedure and Evidence ("Rules"), and the Practice Direction on Allowances for Witnesses and Expert Witnesses ("Practice Direction").² These payments ought to be investigated by the Trial Chamber before the closing of the RUF case.
- 3. The Defence requests that the Trial Chamber, pursuant to its Rule 54³ powers:
 - (i) Order the Prosecution to provide a person or persons to attend the Trial Chamber to provide witness testimony concerning the role and function of the WMU in relation to witnesses and the details of all its payments to witnesses;
 - (ii) Order the disclosure of all payment records of the WMU to facilitate the aforementioned hearing;
 - (iii)Order the Prosecution to clarify the relationship between the WMU and its relationship, if any, with the Witnesses and Victims Section ("WVS");
 - (iv)Order the Registry to clarify its supervision, if any, of the propriety of the WMU payments to witnesses;
 - (v) Order the WVS to provide information concerning its relationship with the WMU and its oversight, if any, of the WMU (including any welfare or security information sharing to prevent duplication or unwarranted payments); and
 - (vi) Any other ancillary Order the Trial Chamber deems necessary.
- 4. The Defence submits that the Orders would allow the Trial Chamber to understand the role of the WMU, take into consideration the impact of any payments to witnesses (pre- and/or post-

¹ "Payments" is used primarily to describe money but also includes other forms of benefit, including relocation packages; housing; educational programs; health care; top-up cards; meals; day trips; social activities; leisure activities; release from imprisonment; assistance with immigration issues, criminal charges or civil penalties; or any other form of assistance.

² Practice Direction on Allowances for Witnesses and Expert Witnesses, Adopted on 16 July 2004.

Rule 54 provides a general power to allow the Trial Chamber to issue "such orders, summonses, subpoenas, warrants and transfer orders as may be necessary for the purposes of an investigation or for the preparation or conduct of the trial".

testimony, proper or otherwise) and thereafter to assess the full impact of the payments on the credibility of witness testimony and ultimately the integrity of the RUF proceedings.

II. MERITS

- 5. The Prosecution has a duty to provide measures for the security and welfare of potential witnesses when they are necessary⁴ for the limited purposes of its investigations. This duty arises pursuant to Rule 39(ii)⁵ and is further prescribed – and limited – by Article 16(4)⁶ and Rule 34.
- 6. The Prosecution's duty to take all "measures deemed necessary for the purpose of the investigation, including the taking of any special measures to provide for the safety, the support and the assistance of potential witnesses and sources" is operative only during the investigative stage.8 The measures must be necessary (Rule 39(ii)). The Statute and the Rules states that only the Registrar, through the WVS, is mandated to provide "protective measures and security arrangements, counselling and other appropriate assistance for witnesses, victims who appear before the court" or those who, post-testimony, "are at risk" as a result thereof and "[p]rovide [all witnesses, victims who appear before the Special Court] with adequate protective measures and security arrangements and develop long- and short-term plans for their protection and support". 10 This function is further prescribed and regulated by the "Practice Direction on Allowances for Witnesses and Expert Testimony" which provides that "[f]or witnesses and expert witnesses residing in Sierra Leone, the Witnesses and

⁴ Rule 39(i) and (ii).

⁵ Rule 39(ii) states:

In the conduct of an investigation, the Prosecutor may: (i) Summon and question suspects, interview victims and witnesses and record their statements, collect evicence and conduct on-site investigations; (ii) Take all measures deemed necessary for the purpose of the investigation, including the taking of any special measures to provide for the safety, the support and the assistance of potential witnesses and sources. ⁶ Article 16(4) states, inter alia:

The Registrar shall set up a Victim's and Witnesses Unit within the Registry. This Unit shall provide, in consultation with the Office of the Prosecutor, protective measures and security arrangements, counselling and other appropriate assistance for witnesses, victims who appear before the Court and others who are at risk on account of testimony given by such witnesses.

⁷ Rule 39(i) and (ii); emphasis added.

The Rules are divided into 9 sections and purport to regulate the various stages of the trials. Rule 39 falls squarely into section IV "Investigations, Rights of Suspects and Accused" which is followed by Part V: Pretrial Proceedings and thereafter, inter alia Part VI: Proceedings before the Trial Chamber. Investigations are further defined as conduct involving the summoning and questioning of suspects, interviewing of victims and witnesses, recording of statements, collecting evidence and conducting on-site investigations. The conduct of an investigation - as defined by Rule 39 - does not include any activity following the taking of statements during the pre-trial period and would by implication exclude lawyerly activities such as the preparation of a witness to give testimony or so-called proofing.

⁹ Article 16(4).

¹⁰ Rule 34(A)(ii).

¹¹ Adopted on 16 July 2004.

Victim's Section shall ensure the payment of all allowances".¹² The Registrar may delegate his authority under the Practice Direction to only the Chief of the WVS.¹³

- 7. The payments of all allowances to witnesses (including attendance allowances, transportation in connection with testifying, accompaniment by support persons or dependents, medical expenses, childcare, and other allowances) are therefore under the exclusive domain of the WVS. ¹⁴ The WVS consults with the Prosecution and the Defence Office in the exercise of its functions but it retains at all times this exclusive function.
- 8. In other words, whilst the WMU may be entitled to issue payments during the *investigation* phase in order to provide "special measures" to provide for the safety and support of potential witnesses, there is no statutory or regulatory basis for the issuance of payments once the potential witness becomes a witness and thereby enters into the "protection" of the WVS.
- 9. In sum, the WMU is therefore not entitled to provide payments to witnesses. Payments to witnesses, by either party, whether administered in good faith or otherwise, are prohibited and *ultra vires* the Statute and Rules. The WMU can provide limited payments to *potential* witnesses for the purposes of the Prosecution investigations but is not permitted to provide payments outside of these purposes. It cannot provide payments which fall within the Practice Direction. The WMU must not usurp the role of the WVS. The WMU must at the time the WVS assumes its statutory role limit its role to consultation with the WVS.
- 10. This restriction is crucial to ensure the integrity of the process, which relies upon an independent body and not a party to the proceedings -- issuing payments to witnesses. The whole payment scheme, regulated by the aforementioned legislation and Practice Direction,

Practice Direction, Article 12(A):

The Special Court shall provide witnesses with medical trea ment by a qualified medical institution or professional if they are sick or injured during the days they testify, including days spent on travels and away from home, in connection with testifying. In exceptional cases, the medical treatment shall be provided before and/or after witnesses travel from home provided that such medical treatment is connected with testifying;

Practice Direction, Article 13(A):

Based on an assessment and request by [WVS], the Registrar may authorise the payment of childcare expenses or the payment for other forms of care for dependants of witnesses to enable them to testify.

Practice Direction, Article 14(iv):

Based on an assessment and request by [WVS], including supporting documentation, the Registrar may authorise ... [c]ompensation for extraordinary losses, including loss of income, for witnesses who will suffer or who have suffered undue hardship as a result of testifying.

15 See Paragraph 7, supra.

The Prosecutor v. Issa Hassan Sesay, Morris Kallon, and Augustine Gbao SCSL-04-15-T

¹² Article 2(B); emphasis added.

¹³ Practice Direction; Article 3.

¹⁴ Practice Direction, Article 9(D)(i):

Travel arrangements shall be made by [WVS], for witnesses residing in Sierra Leone.

is premised on ensuring that payments to witnesses do not emanate from a party to the proceedings. This makes good law. Payments to Prosecution witnesses, outside of the neutrality and equality proposed by the activities of the WVS, would violate Article 17(4)(e) of the Statute, namely the right of the Accused to "obtain the attendance and examination of the witnesses on his or her behalf under the same conditions as witnesses against him or her". The Defence has no budget, nor should it have, to administer payments to witnesses.

11. It is evident that there is no statutory or regulatory basis for the existence of a unit – outside of the WVS – to issue payments or any other potential inducement to witnesses. There is no proper basis for payments by the Prosecution to witnesses at all, and demonstrably not for purposes: *inter alia* "wasted time", lost wages on days where witnesses would not have ordinarily worked, "rewards for coming to be interviewed", school fees, hospital bills, or any other similar payment. These payments would appear to be designed to act – or have the capacity to act – as inducements to testify.

CASH FOR CONVICTIONS

- 12. Additionally, even if the WMU were permitted to issue payments to witnesses, which it is not, the payments made by the WMU are substantial and often demonstrably unwarranted within the context of legitimate special measures. There is *absolutely no* legitimate purpose served by payments which do not correspond to exact losses or legitimate expenses incurred by witnesses or those which are in excess of witnesses' reasonable needs and the standardised payments ordinarily issued by the WVS. The payments issued by the WMU are approved by investigators whose primary function is to secure information. These payments are not properly assessed by experts in witness and victim management, do not correspond to reasonable expenses, do not correlate to monies spent or utilized by the witness, and otherwise raise serious questions about their purpose or the *bona fides* of the payer.
- 13. Absolutely critical to the integrity of the Court's process is an explanation of these payments and the impact these payments have on the assessment and reliability of evidence adduced by the Prosecution. The following evidence should be taken into account as providing further proof of both the illegitimacy of the payments and the likelihood that they have fatally undermined the integrity of the process. This evidence is not exhaustive and only includes some of the evidence known to the Defence. The remaining evidence lies exclusively within the domain of the Prosecution who refuse to disclose the complete details of their payments

(e.g., assistance in relocating and organising the immigration status of witness TF1-139.16 and cash payments made to RUF Prosecution Witnesses after the completion of their testimonv¹⁷).

Impermissible Payments

- 14. RUF Prosecution Witness TF1-108
 - (i) Received Le10,000¹⁸ on the 18th November 2004 *inter alia* for "Time Wasted". 19
- 15. RUF Prosecution Witness TF1-113
 - (i) Received Le10,000 on the 18th November 2004 inter alia for "Time Wasted".²⁰
- 16. RUF Prosecution Witness TF1-114
 - (i) Received Le10,000 on the 17th November 2004 interalia for "Time Wasted".²¹
- 17. RUF Prosecution Witness TF1-141
 - (i) Payment of Le50,000 on the 28th September 2003 for "school fees at Holy Trinity School".22
 - (ii) Payment of Le100,000 on the 22nd October 2003 "for support to foster parent".²³
 - (iii)Payment of Le150,000 on the 11th May 2004 for "St bsistence allowance".²⁴
 - (iv)Payment of Le120,000 on the 9th September 2004 for "weekly allowance".²⁵
- 18. RUF Prosecution Witness TF1-361
 - (i) Payment on the 7th December 2004 of Le10,000 to witness for inter alia "wasted time". ²⁶
- 19. RUF Prosecution Witness TF1-371
 - (i) Payment on the 3rd November 2005 of \$50 for "Source development/information".²⁷
 - (ii) Payment on the 26th November 2005 of \$50 for "Information". ²⁸
 - (iii)Payment on the 10th December 2005 of \$200 for "Information on leads for potential witnesses".29
- 20. RUF Prosecution Witness Alfred Sesay
 - (i) Payment on the 22nd October 2003 of Le5,000 for *imer alia* "time wasted".³⁰
 (ii) Payment on the 23rd October 2003 of Le5,000 for "ti ne wasted".³¹

 - (iii) A second payment on the 23rd October 2003 of Le5,000 for "time wasted". 32

SCSL-04-15-T

¹⁶ RUF Trial, Transcript, 6th October 2004, pp. 15-41.

Letter from Charles Hardaway to Mr. Jordash and Ms. Ashraph dated 27th September 2007; Annex A.

¹⁸ 3,000 Leones typically exchanges for one US Dollar.

¹⁹ Annex B, p. B-1.

²⁰ Annex B, p. B-3.

²¹ Annex B, p. B-5.

²² Annex B, p. B-7 and B-10.

 $^{^{23}}$ Annex B, p. B-7 and B-10.

²⁴ Annex B, p. B-8 and.

²⁵ Annex B, p. B-8 and B-10.

²⁶ Annex B, p. B-13.

²⁷ Annex B, p. B-15.

²⁸ Annex B, p. B-15.

²⁹ Annex B, p. B-15.

³⁰ Annex B, p. B-18. 31 Annex B, p. B-18.

The Prosecutor v. Issa Hassan Sesay, Morris Kallon, and Augustine Gbao

21. Prosecution Witness TF1-356

(i) Payment of Le37,500 on the 5th May 2004 for medical supplies "upon the completion of the investigative process".³³

Impermissible and/or Inappropriate Leisure Activities

22. Prosecution Witness TF1-046

(i) The Prosecution have confirmed that the WMU took witness T1-046 out on regular Sunday trips, including a Sunday luncheon appointment to an expensive restaurant (Franco's Restaurant). The Deputy Chief of WVS confirmed that these trips were not considered necessary for the witnesses' welfare or any protective measure.³⁴

Excessive or Duplicative Payments by WMU

23. RUF Prosecution Witness TF1-035

(i) Payment of Le40,000 on the 15th February 2005 for "reimbursement for lost funds". The lack of proper explanation for this large payment ought to be observed.³⁵

24. Prosecution Witness TF1-046

- (i) Payment of \$250 on the 23rd October 2002 to "cove cost associated to Maintenance". No other explanation is provided.³⁶
- (ii) Payment of \$100 on the 1st November 2002 to "cover cost associated to Maintenance". No other explanation is provided.³⁷
- (iii)Payment of Le436,000 between the 8th and 10th March 2003 for "costs associated to Maintenance" and "meals".³⁸

25. RUF Prosecution Witness TF1-139

- (i) Payment of \$400 between 6th and 18th November 2002 for "communications, top up cards".³⁹
- (ii) Payment of \$500 on the 31st October 2003 for "communication, top up and subsistence for family". 40
- (iii)Benefits of \$15,000.41

26. Prosecution Witness TF1-151

(i) Payment totalling \$2,623 for "maintenance", "clothing and luggage", "meals", and "purchase of fuel" between the 12th and 19th December 2002. 42

27. RUF Prosecution Witness TF1-360

(i) Payment of Le250,000 on 3rd February 2006 for "Accommodations, meals, repairs to

³² Annex B, p. B-18.

³³ Annex B, p. B-19.

³⁴ RUF Trial, Transcript, 20th June 2007, pp. 46-60.

³⁵ Annex C. p. C-1.

³⁶ Annex C. p. C-3.

³⁷ Annex C. p. C-3.

³⁸ Annex C. pp. C-4/5.

³⁹ Annex C, pp. C-7/8.

⁴⁰ Annex C, p. C-9. This witness entered the care of WVS in April 2003; see RUF Trial, Transcript, 7th October 2004, p. 29.

⁴¹ RUF Trial, Transcript, 7th October 2004, p. 28.

⁴² Annex C, pp. C-10/11.

- motor vehicle and top up phone card for two days". 13
- (ii) Payment of Le500,000 on 6th February 2006 for "meals and transport" and "source information".44
- (iii)Payment of Le350,000 on 20th February 2006 for "source information". 45

28. RUF Prosecution Witness TF1-366

- (i) Payment of Le80,000 on the 25th August 2004 for inter alia "food" for "eight days";46 a further Le30,000 for inter alia "meals" on the 31st August 2004 and a further Le100,000 for *inter alia* "meals" on the 1st September 2004.⁴⁷
 (ii) Payment of Le70,000 on the 12th November 2004 for "Food for Seven days (7)"; a further
- Le70,000 for "Food, Snacks and Drinks" and "Meals" on the 16th November 2004; Le10,000 for "Meals" on the 18th November 2004 and a further Le20,000 on the 19th November 2004. 49 (These amounts were supplemented on the 17th November 2004 by a further payment to "Witness for Family attendance" in the sum of Le150,000). 50

Prosecution Attempted Inducement of Defence Witnesses

- 29. Defence Witness DIS-281
 - (i) Defence witness DIS-281 confirmed that he was given \$100 by the Prosecution in order to persuade him to become a Taylor Prosecution Wirness.⁵¹

Additional Known Prosecution Payments - Testimony from RUF and Taylor Trials

- 30. The evidence given by Prosecution witnesses⁵² confirms that the Prosecution (through the WMU) provides payments for witnesses which are rot linked to any legitimate witness expense or security concern. This has been confirmed by:
 - (i) RUF Prosecution Witness TF1-334 was given a Le5,000 "allowance" on the 10th April 2004 for "transport" notwithstanding travelling in a SCSL vehicle. This "allowance" occurred on several different occasions;⁵³
 - (ii) RUF Prosecution Witness TF1-334 was given 52 payments for the "purchase of information" and for "meals" between 4th April 2006 and 6th November 2007. The total was Le1,037,000 (345USD).⁵⁴ E.g., Le60,000 on the 16th November 2006.⁵⁵ The payments would be made on days when the Prosection have no record of any interviews

⁴³ Annex C, p. C-18. This witness first arrived into the care of WVS on 1st April 2005.

⁴⁴ Annex C, p. C-19.

⁴⁵ Annex C, p. C-19.

⁴⁶ Annex C, p. C-27. This payment equalling Le10,000 per day for food would appear to represent an attempt by the Prosecution at standardising payments for meals to witness: thus at times the Prosecution appears to recognise that Le10 000 per day is reasonable for "feeding" (see a'so Annex B, p. B-3, detailing a payment to TF1-113 on the 1st July 2005 of Le10,000 for "one day feeding"). At other times this standardization is inexplicably ignored, as per the remainder of the payments to TF1-366.

Annex C, p. C-28.

⁴⁸ Annex C, pp. C-29/30.

⁴⁹Annex C, p. C-31.

⁵⁰ Annex C, p. C-30.

⁵¹ Confidential Annex D, Statement of DIS-281

⁵² Evidence given by Defence witnesses in the RUF trial concernir g payments to Prosecution witnesses is not included in these known payments to Prosecution witnesses.

Taylor Trial, Transcript, 29th April 2008, pp. 8885-87.
 Taylor Trial, Transcript, 29th April 2008, pp. 8903-04.

⁵⁵ Taylor Trial, Transcript, 29th April 2008, p. 8899.

- being conducted. The witness testified (92bis) in the RUF Trial from the 5th-10th July 2006.56 (The witness claimed that the money was for transportation and not information as indicated by the WMU records⁵⁷);
- (iii) RUF Prosecution Witness TF1-334 was given money for meals on days (e.g., 30th and 31st August 2006) when the witness was not interviewed;⁵⁸
- (iv)RUF Prosecution Witness TF1-334 was provided with a new mobile phone to enable the OTP to be in contact "in view of in depth clarification interviews";55
- (v) RUF Prosecution Witness TF1-015 noted that he was given money as "a kind of gesture" or "because [the investigators] wasted his time";60
- (vi)RUF witness TF1-360 confirmed that he had received payments on days when he had not been interviewed and had received money to allow him to carry out repairs at home ("If I had anything that needed repair at home they will send a mechanic to go and repair the generator at home, so they will give the money and I will give money to the mechanic to do the work"),61
- (vii) RUF Prosecution Witness TF1-362 confirmed that in April 2005 the Prosecutor handed her an unknown quantity of money in an envelope and said, "Please put it into good use and take care of yourself". The witness confirmed that there was no reason given for the payment and it was unsolicited. This payment has not been disclosed to the Defence. It is noteworthy that this witness gave evidence in the RUF trial between the 20th and 26th
- (viii) RUF Prosecution Witness TF1-362 also confirmed that the Prosecution gave the witness money to travel to Freetown for a family meeting; 63
 - (ix) RUF Prosecution Witness TF1-366 confirmed that since he had been cooperating with the Prosecution he was able to "sleep in a decent place", had "decent food to eat", could "change clothes", and consequently he wanted to help the Prosecution because they helped him: "Yes. Yes, I want to help them. Today and tomorrow, I want to help them". 64
 - (x) Taylor Prosecution Witness Moses Blah who noted that he was given money by the Prosecution as "a good will gesture";⁶⁵
 - (xi) Taylor Prosecution Witness TF1-337 confirmed that the money he was given purportedly for lost wages did not correspond to the sum he would lose from not working: the Le30,000 he had been paid for "lost wages" in November 2003 was in excess of the Le20,000 which he would ordinarily utilise in legitimate expenses for his family in the same two days and in excess of the Le5,000-10,000 income he might earn in his irregular employment;⁶⁶
- (xii) Taylor Prosecution Witness TF1-337 also confirmed that he received Le250,000 to pay for his children's school fees and uniforms, etc. which was given to him because he had some "problems" in his family;⁶⁷
- (xiii) Taylor Prosecution Witness TF1-532 (Isaac Mongo) confirmed that he had received money purportedly for lost wages notwithstanding that he had not informed the

⁵⁶ The witness was a protected witness in the RUF case but this fact is now in the public domain and was discussed openly in the Taylor Trial (e.g., Taylor Trial, Transcript, 29th April 2008, p. 8907).

⁵⁷ Taylor Trial, Transcript, 28th April 2008, p. 8898. ⁵⁸ Taylor Trial, Transcript, 28th April 2008, pp. 8902.

⁵⁹ Taylor Trial, Transcript, 28th April 2008, pp. 8903.

aylor Trial, Transcript, 26 April 2006, pp. 6703.

Taylor trial, Transcript, 9th January 2008, p. 788.

Taylor trial, Transcript, 7th February 200, p. 3402.

Taylor trial, Transcript, 3rd March 2008, p. 5147.

Taylor trial, Transcript, 4th March 2008, pp. 5164-5.

RUF trial, Transcript, 10th November 2005, p. 79.

⁶⁵ Taylor trial, Transcript, 9th January 2008, p. 10127. ⁶⁰ Taylor trial, Transcript, 7th March 2008, pp. 5545-5550.

^{o7} Taylor trial. Transcript, 7th March 2008, p. 5571.

- Prosecution of the amount he would ordinarily earn 68 and the days on which he would not have been working.⁶⁹ As the witness noted, "they gave me money, but they did not tell me the purpose for the money". 70
- (xiv) Taylor Prosecution Witness TF1-532 confirmed that the Prosecution was "always giving [him] money",⁷¹ and that even though he did not work on a Sunday he had been given money for lost wages on the 28th January 2007 which was a Sunday.⁷² As the witness noted when asked to explain the payment, the witness stated "maybe that is the procedure of their own job". 73
- (xv) Taylor Prosecution Witness TF1-548 confirmed that he has been given money "as a reward for coming to be interviewed" and as "compensation for the efforts" he had made in coming to see the Prosecution.⁷⁴ The witness confirmed that whenever he met the Prosecution he would be given \$100.75 The witness confirmed that he would be given money for information and sometimes it was "just possible that they wanted to help" him.76
- 31. It is thus clear that the WMU not only makes unwarranted and impermissible payments to witness but also has not fulfilled its disclosure obligations therein. The Prosecution has a duty to "make a statement under [Rule 68] disclosing to the defence the existence of evidence known to the Prosecutor ... which may affect the credibility of prosecution witnesses". The Prosecution has failed to disclose any statement detailing any other issuance of payments (whether relocation packages, housing, educational programs, day trips, social activities, leisure activities, assistance with immigration issues or any other form of assistance). The Prosecution has refused to provide any details of these aspects of the functioning of the WMU and are therefore in breach of their Rule 68 obligations. This is in addition to acting ultra vires Article 16, Rules 34 and 39, and the Practice Direction.

REQUEST

32. It is trite law that at the end of the Defence case and having heard the main Defence and Prosecution witnesses, a Trial Chamber may find it absolutely necessary to call additional witnesses proprio motu.78 The Chamber and the parties in an adversarial system have

⁶⁸ Taylor trial, Transcript, 1st April 2008, p. 6705

⁶⁹ Taylor trial, Transcript, 1st April 2008, p. 6372.

⁷⁰ Taylor trial, Transcript, 1st April 2008, p. 6371.

Taylor trial, Transcript, 1 April 2006, p. 0571.

Taylor trial, Transcript, 7th April 2008, p. 6704.

Taylor trial, Transcript, 7th April 2008, p. 6705.

Taylor trial, Transcript, 7th April 2008, p. 6706.

April 2008, p. 6706.

Taylor trial, Transcript, 13th February 2008, p. 3775.

Taylor trial, Transcript, 13th February 2008, p. 3776.

Taylor trial, Transcript, 13th February 2008, p. 3785.

⁷⁷ Rule 68 of the Rules.

⁷⁸ Jurisprudence of the Interantional Criminal Courts and the European Court of Human Rights, Vladimir Tochilovsky, Martinus Nijhoff Publishers, Leiden 2008, at 387-88, citing Prosecutor v. Blaškić, IT-95-14-T, "Decision of Trial Chamber I in respect of the Appearance of General Enver Hadzihasanović", 25 March 1999, Prosecutor v. Blaškić, IT-95-14-T, "Decision of Trial Chamber 1 in respect of the Appearance of General The Prosecutor v. Issa Hassan Sesay, Morris Kallon, and Augustine Gbao 10 SCSL-04-15-T

different interests, and once it becomes clear to the Chamber that the parties are not going to call important witnesses, and once the Chamber has made the additional determination that their potential testimony might assist in the search for the truth, it would be quite inexcusable for the Chamber not to call them.⁷⁹

- 33. It is submitted that the Orders sought are essential to establish the role of the WMU in issuing payments to witnesses and the impact on the reliability and integrity of the evidence adduced by the Prosecution in the RUF trial. In light of the manifest irregularities in payments to Prosecution witnesses in the trials at the Special Cour: and the failure of the Prosecution to provide any reasonable explanation or further information concerning the operations of the WMU (including the details within its knowledge of non-monetary payments), the Defence reiterates its requests in Paragraph 3 above.
- 34. No party in any fair adversarial process should be able to buy testimony or offer even the glimpse of an inducement to witnesses. The Trial Chamber has already found that the Prosecution previously obtained testimony by offering "hope of advantage" and through "fear" and the available evidence suggests that this has continued throughout the trial through the issuance of impermissible and unwarranted payments.
- 35. There is a common perception within Sierra Leone that the Prosecution pays its witnesses. The available evidence suggests that that this may well be correct. It is submitted that a hearing in which the aforementioned issues were aired would provide transparency and an opportunity for the parties to put their case. It is submitted that the integrity of the RUF trial and the legacy of the Special Court may well have been undermined by the payments or the public perception of them. It is imperative thus that the Trial Chamber seeks the truth and restores that which has been damaged.

Dated 30th May 2008

Wayne Jordash Sareta Ashraph

Philippe Morillon", 12 May 1999, and *Prosecutor* v. *Blaškić*, IT-95-14-T, "Decision of Trial Chamber I in respect of the Appearance of Mr. Jean-Pierre Thébault", 13 May 1999.

Prosecutor v. Sesay et al., SCSL-04-15-807, "Oral Ruling on the Admissibility of Alleged Confessional Statements obtained by Investigators of the Office of the Prosecutor from the First Accused, Issa Hassan Sesay", 5th July 2007.

⁷⁹ Prosecutor v. Krajišnik, IT-00-39-T, "Reasons for Decision Denying Defence Motion Regarding Chamber Witnesses Biljana Plavšić and Banko Deric and Decision on Admission into Evidence of Biljana Plavšić's Statement and Book Extracts," 14 August 2006, para. 13.

LIST OF AUTHORITIES

Decisions

Prosecutor v. Blaškić, IT-95-14-T, "Decision of Trial Chamber I in respect of the Appearance of General Enver Hadźihasanović", 25 March 1999.

Prosecutor v. Blaškić, IT-95-14-T, "Decision of Trial Chamber I in respect of the Appearance of General Philippe Morillon", 25 March 1999.

Prosecutor v. Blaškić, IT-95-14-T, "Decision of Trial Chamber I in respect of the Appearance of Mr. Jean-Pierre Thébault", 25 March 1999.

Prosecutor v. Krajišnik, IT-00-39-T, "Reasons for Decision Denying Defence Motion Regarding Chamber Witnesses Biljana Plavšić and Banko Đeric and Decision on Admission into Evidence of Biljana Plavšić's Statement and Book Extracts," 14 August 2006.

Prosecutor v. Sesay et al., SCSL-04-15-807, "Oral Ruling on the Admissibility of Alleged Confessional Statements obtained by Investigators of the Office of the Prosecutor from the First Accused, Issa Hassan Sesay", 5th July 2007.

Publications

Jurisprudence of the Interantional Criminal Courts and the European Court of Human Rights, Vladimir Tochilovsky, Martinus Nijhoff Publishers, Leiden 2008.

LIST OF ANNEXES

Annex A: Letter from Charles Hardaway to Mr. Jordash and Ms. Ashraph

dated 27th September 2007.

Annex B: Impermissible Payments

Annex C: Excessive or Duplicative Payments

Confidential Annex D: Statement of DIS-281

Annex E: Letter from Mr. Jordash to Mr. Harrison, dated 1st December

2007 and reply from Mr. Flapp, dated 18th December 2007

Annex A – Letter from Charles Hardaway to Mr. Jordash and Ms. Ashraph dated 27th September 2007.



SPECIAL COURT FOR SIERRA LEONE OFFICE OF THE PROSECUTOR

JOMO KENYATTA ROAD • NEW ENGLAND • FREETOWN • SIERRA LEONE PHONE: +1 212 963 9915 Extension: 178 7000 or +3! 0831 257000 or +232 22 297000 FAX: Extension: 178 7366 or +39 0831 257366 or +232 22 297366

27 September, 2007

Sesay Defence Office c/o Special Court for Sierra Leone

Attention: Wayne Jordash / Sareta Ashraph

Dear Sir / Madam,

We are able to provide you with the following information in response to your letter of 17 September 2007.

No payments were made to the following witnesses before their evidence and no payments were made after their testimony in the RUF trial that were contemplated at the time they appeared as a witness: TF1-042, TF1-044, TF1-081 (see letter of 1 March 2006), TF1-165 (see letter of 1 March 2006), TF1-168 (see letter of 1 March 2006), TF1-169 (see letter of 1 November 2005), TF1-272 (see letter of 4 July 2005), TF1-288 (see letter of 1 March 2006), TF1-296, TF1-355 and TF1-369.

We attach copies of those previously disclosed payments that were made to TF1-129 (previously provided on 6 April 2005), TF1-139 (previously provided on 30 June 2004), TF1-199 (previously provided on 30 June 2004), and TF1-366 (previously provided on 1 November 2005).

Upon consideration of your request that the Prosecution disclose the most up to date disbursements paid to all Prosecution witnesses, we have determined that it would not be appropriate to do so, nor is it required. Protective measures exist in other trials and the Prosecution must abide by those orders to prevent disclosure of information which may disclose the identities of protected witnesses in those trials, and payments subsequent to a person giving evidence, not contemplated before their testimony, is not Rule 68 material.

Yours truly,

C 1arles Hardaway

Encl.

ANNEX B – Impermissible Payments



SCSLP0058 TF1-108

Made By: MKOROMA Reason: Payment to facilitate the attendance of Witness to the Special Court field office in Kailahum the purpose of furthering investigative leads and re-confirmation as well as funding for lost wages. Category: TRANSPORT/ LOST WAGES Receipt Amount: 20,000.00 SUS Dollars Local Currency Approved By: CBOMFORD Date: Thursday, November 18, 2004 Receipt No: 914029482 Made By: PSANNOH Reason: Payment to Witness for Time wasted and Meals Category: TIME WASTED/MEALS Receipt Amount: 10,000.00 SUS Dollars Local Currency Approved By: ACOMEAU Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Receipt Amount: 10,000.00 SUS Dollars Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt Amount: 10,000.00 SUS Dollars Receipt Amount: 10,000.00 SUS Dollars Local Currency	1	Date:	Sunday, Fe	bruary 01, 2004	Rec	eipt No: 51979000	
the purpose of furthering investigative leads and re-confirmation as well as funding for lost wages. Category: TRANSPORT/ LOST WAGES Amount: 20,000.00	Made By:	: MKOROMA				•	
Amount: 20,000.00	Reason:	the purpose of fi	litate the attenda urthering invest	ance of Witness igative leads and	to the S _l l re-con	oecial Court field offic îrmation as well as fur	e in Kailahun for nding for lost
Approved By: CBOMFORD Date: Thursday, November 18, 2004 Receipt No: 914029482 Made By: PSANNOH Reason: Payment to Witness for Time wasted and Meals Category: TIME WASTED/MEALS Receipt Amount: 10,000.00 SUS Dollars Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Receipt Amount: 10,000.00 SUS Dollars Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Receipt Amount: 10,000.00 SUS Dollars Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt Receipt	Category:	TRANSPORT/	LOST WAGES			Receipt 🗹	
Date: Thursday, November 18, 2004 Reccipt No: 914029482 Made By: PSANNOH Reason: Payment to Witness for Time wasted and Meals Category: TIME WASTED/MEALS Receipt Amount: 10,000.00 □ \$US Dollars □ Local Currency Approved By: ACOMEAU Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Receipt □ Amount: 10,000.00 □ SUS Dollars □ Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt □	Amount:	20,000.00		SUS Dollar	rs [Local Currency	
Made By: PSANNOH Reason: Payment to Witness for Time wasted and Meals Category: TIME WASTED/MEALS Amount: 10,000.00 □ \$US Dollars Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Amount: 10,000.00 □ \$US Dollars Receipt ☑ Amount: 10,000.00 □ \$US Dollars Accompany: Accompany Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ☑	Approved I	By: CBOMFO	RD				
Made By: PSANNOH Reason: Payment to Witness for Time wasted and Meals Category: Time WASTED/MEALS Amount: 10,000.00	2	Date:	Thursday, Nov	ember 18, 2004	Rece	ipt No: 914029482	
Amount: 10,000.00 SUS Dollars Local Currency Approved By: ACOMEAU Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Receipt Amount: 10,000.00 SUS Dollars Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt Category: meals	Made By:	PSANNOH	•	,		•	
Amount: 10,000.00 SUS Dollars Local Currency Approved By: ACOMEAU Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Amount: 10,000.00 SUS Dollars Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt	Reason:	Payment to Witn	ess for Time wa	isted and Meals			
Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Amount: 10,000.00 □ SUS Dollars ☑ Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ☑	Category:	TIME WASTED)/MEALS			Receipt 🗹	
Date: Saturday, March 19, 2005 Rece pt No: -271640226 Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Amount: 10,000.00 □ SUS Dollars ☑ Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ☑	Amount:	10,000.00		□ \$US Dollar	·s 5	Local Currency	
Made By: ASESAY Reason: Payment made to witness for meals whilst travelling to Freetown from Kailahun. Category: MEALS Amount: 10,000.00 □ \$US Dollars □ Local Currency Approved By: ACOMEAU Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt □ Amount: 10,000.00 □ \$US Dollars □ Local Currency Approved By: Local Currency Approved By: ACOMEAU	Approved B	y: ACOMEAU	U :			: :	
Amount: 10,000.00	· ·	ASESAY					
Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ✓	Category:	MEALS				Receipt 🗹	
Date: Monday, November 14, 2005 Receipt No: 1132576378 Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ✓	Amount:	10,000.00		SUS Dollars	. ☑'	Local Currency	
Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ✓	Approved By	v: ACOMEAU	J				
Made By: UKAMARA Reason: Payment for meals to witness whilst treavelling from Kailahun to Bo on 14/11/05 Category: meals Receipt ✓						:	
Category: meals Receipt 🗹	Made By: J		Monday, Nover	mber 14, 2005	Receip	t No: 1132576378	
Category: meals Receipt 🗹	·		to witness whil	st treavelling fro	m Kail:	thun to Bo on 14/11/0:	5
_				•		_	
	Amount: 1	0,000.00		SUS Dollars	Y	Local Currency	
Approved By: PMCLAREN	Approved By:	PMCLAREN	I				



3		D	ate: luesda	y, November 15, 2005	Receipt No: 72	28766323
	Made By:	UKAMAF	LA.			
	Reason:	PAYMEN FREETOV	T FOR TRANS VN ON PUBLI	SPORT/MEALS FOR V IC TRANSPORT.	VITNESS TO TR	AVEL FROM BO TO
	Category:	TRANSPO	ORT/MEALS		Recei	ot 🗹
	Amount:	35,000.00		SUS Dollars	Local C	urrency
	Approved B	y: PMC	LAREN			
					<u> </u>	
6		Da	ite: Saturd	ay, February 25, 2006	Receipt No: -2	015635955
	Made By:	JTOMMY				
	Reason:	Payment m	ade to witness	for a day meal whilst tra	velling form Kai	lahun to freetown.
	Category:	Meals			Receip	t 🗹
	Amount:	5,000.00		SUS Dollars	☐ Local C	ırrency
A	Approved B	y: MSA	MBA			
7		_		: _ _ \.	:	÷
•	Made Dec	Da ETOMONY	te: Saturda	y, February 25, 2006	Receipt No: 114	41035561
	Made By:		do to mitues f		-11' - C - 17' - '1	1
			ide to witness t	or one meals whilst trav		
1	Category:				Receipt	
	Amount: 5	5,000.00		☐ \$US Dollars	☑ Local Cu	rrency
A	pproved By	: MSAN	I BA			
Tot	al Disbur	sements	\$US Dollar	s Local Currency	Totals	No. of Payments
					90,000.00	6
					5,000.00	. 1



SCSLP0224 TF1-113

1		Date:	Receipt No: -1940311883	
N	Made By: JTON	ſМY		
	Reason: Paymo	ent made to w	ritness for one day meal form Kailahun to freetown.	
C	Category: Meals	;	Receipt 🗹	
	Amount: 5,000.	.00	SUS Dollars S Local Currency	
Aŗ	oproved By:	MSAMBA		
2		Date: We	ednesday, February 04, 2004 Receipt No: 1075486552	
N	Made By: MKO			
	Reason: Payme the pu wages	rpose of furth	e the attendance of Witness to the Special Court field office ering investigative leads and re-confirmation as well as fund	in Kailahun for ling for lost
C	Category: TRAN	NSPORT/ LO	ST WAGES Receipt	
	Amount: 20,000	0.00	☐ \$US Dollars	
Ap	oproved By: (CBOMFORD		
3		Date: Th	ursday, November 18, 2004 Rece pt No: -1520455192	
	1ade By: PSAN		disday, Novoliou 10, 2001 - 11000 possess	
	•	-	for Time wasted and Meals	
C	ategory: MEAI	S/TIME WA	STED Receipt 🗹	
ž	Amount: 10,000	0.00	☐ \$US Dollars ☑ Local Currency	
Ap	proved By: A	COMEAU		
•		:		. :
4		Date:	Friday, July 01, 2005 Receipt No:	
	lade By: JTOM		C 1 C 1	
	Reason: Payme	nt to Witness	for one day feeding.	
C	ategory: FEEDI	NG	Receipt 🗹	
A	Amount: 10,000	.00	SUS Dollars	
Ap	proved By: J	BONZER		



5 Da	te: Frida	y, October 07, 2005	Receipt No: 112	28949022	
Made By: AKOMEH					
	-	n/meal/communication nsport on 12/10/05	n for witness to tra	avel from Pendembu to	
Category: TRANSPOR	RT		Receipt		
Amount: 80,000.00		SUS Dollars	☑ Local Currency		
Approved By: JBON	ZER				
Total Disbursements	\$US Dollars	Local Currency ✓	Totals 125,000.00	No. of Payments	



TF1-114

1	Date:	Wednesda	ay, November 17, 2004	Receipt No: 708	8376803
Made By: PSAN	HON				
Reason: Paym	ent to Witne	ss for Time	wasted and Meals		
Category: TIME	E WASTED	MEALS		Receipt	t 🗹
Amount: 10,000	0.00		\square \$US Dollars	✓ Local Cu	rrency
Approved By:	ACOMEAU				
Total Disbursem	ents \$U.	S Dollars	Local Currency ☑	Totals 10,000.00	No. of Payments



1	D:	ıte: Su	nday, April 06, 2003	Receipt No: 19	56553197
Made Bv	: JSAFFA		2, 1 ,		
		ade to	o cover cost associate	to Lost Wages.	
Category	: LOST WA	GES		Receip	t 🗹
Amount	5,000.00		☐ \$US Dollars	✓ Local Cu	irrency
Approved	By: JSAF	FA			
Made By:	Da MKOROM	•	, February 19, 2004	Receipt No: -56	7626942
· ·	Funds requi	red to facilitate	the attendance of mation process as well		cial Court field location t wages.
Category:	TRANSPO	RT/ LOST WAC	BES	Receipt	$\overline{\checkmark}$
Amount:	10,000.00		□ \$US Dollars	☑ Local Cui	rrency
Approved I	By: MFLC	YD			
otal Disbu	rsements	\$US Dollars	Local Currency	Totals	No. of Payments
				15,000.00	



SCSLP0035

IF1-	171			
Made Pr	Date:	Sunday, September 28, 2003	Receipt No: 1044411844	
-		for Witness School fees at Holy Tr	rinity School.	
	: SCHOOL FEES	·	Receipt 🗹	
_	: 50,000.00	∫ SUS Dollars		
Approved			Local Currency	
Approved	by. GMORISS			
•	Date:	Wednesday, October 22, 2003	Receipt No: -244124533	
	-	o Witness for support to foster par	<u> </u>	
Category:	SUPPORT		Receipt 🗹	
Amount:	100,000.00	SUS Dollars	✓ Local Currency	
	By: GMORISS	CTTC .		
Approved I	Date:		Receipt No: 1644070561	
Made By:	Date: MSAMBA Payment to Spur attended Freetow		s accommodation for Witness nation process. The bill attached	
Made By: Reason:	Date: MSAMBA Payment to Spur attended Freetow	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion associated the confirm two; however, the portion associated the confirm two;	s accommodation for Witness nation process. The bill attached	
Made By: Reason: Category:	Date: MSAMBA Payment to Spur attended Freetow accommodation f	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion associated the confirm two; however, the portion associated the confirm two;	s accommodation for Witness nation process. The bill attached ciate I to Witness is 157,500.	
Made By: Reason: Category: Amount:	Date: MSAMBA Payment to Spur attended Freetow accommodation f ACCOMMODA 157,500.00	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm or two; however, the portion association.	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt	
Made By: Reason: Category:	Date: MSAMBA Payment to Spur attended Freetow accommodation f ACCOMMODA 157,500.00	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion assocition \[\subseteq \\$US Dollars \]	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt	
Made By: Reason: Category: Amount: Approved B	Date: MSAMBA Payment to Spur attended Freetow accommodation f ACCOMMODATION,500.00 By: MFLOYD	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion assocition \[\subseteq \\$US Dollars \]	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt Local Currency	
Made By: Reason: Category: Amount: Approved B Made By: Reason:	Date: MSAMBA Payment to Spur attended Freetow accommodation for ACCOMMODA 157,500.00 By: MFLOYD Date: MSAMBA Payment necessar Freetown upon the receipt as departure	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion assocition \[\subseteq \\$US Dollars \]	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt Local Currency Receipt No: 786262717 ness eturn transport to Kenemon process. No signature obtain	a from
Made By: Reason: Category: Amount: Approved B Made By: Reason:	Date: MSAMBA Payment to Spur attended Freetow accommodation for ACCOMMODA 157,500.00 By: MFLOYD Date: MSAMBA Payment necessar Freetown upon the receipt as departure	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion assortion SUS Dollars Tuesday, March 02, 2004 y to cover costs associated to Witte completion of the re-confirmation re time from Freetown was necess	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt Local Currency Receipt No: 786262717 ness eturn transport to Kenemon process. No signature obtain	a from
Made By: Reason: Category: Amount: Approved B Made By: Reason:	Date: MSAMBA Payment to Spur attended Freetow accommodation for the ACCOMMODA street of the ACCOMMOD	Monday, March 01, 2004 View Guest House for three night in from Kenema for the re-confirm for two; however, the portion assortion SUS Dollars Tuesday, March 02, 2004 y to cover costs associated to Witte completion of the re-confirmation re time from Freetown was necess	s accommodation for Witness nation process. The bill attached ciated to Witness is 157,500. Receipt Local Currency Receipt No: 786262717 ness eturn transport to Kenemon process. No signature obtainary immediately negating the contraction of the contraction	a from



5		Date:	Tuesday, March	02, 2004	Receipt No: -749131988	
	Made By:	MSAMBA				
	Reason:	Kenema for the departure time	e purpose of the re-conf	irmation pr	eals taken by Witness while ocess. No signature obtained ediately negating the oporture	d on receipt as
	Category:	MEALS			Receipt 🗹	
	Amount:	65,000.00	□ \$ 1	U S Dollars	Local Currency	
	Approved B	y: MFLOY	D			
6		Date:	Tuesday, May	11, 2004	Receipt No: -1480642997	
	Made By:	MKOROMA				
	Reason:	Payment to Wi	tness for Subsistance all	owance.		
	Category:	ALLOWANCI	Ξ		Receipt 🗹	
	Amount:	150,000.00	□ su	S Dollars	✓ Local Currency	
1	Approved B	y: MFLOYI)			
7		Date:	Friday, August (06, 2004	Receipt No: -61219138	
	Made By:	ASESAY				
		•	for Witness for Medicati ent. 5,000 for transport		as funding for Transportation for Medication	n to and fro for
	Category:	TRANSPORT/	MEDICAL		Receipt 🗹	
	Amount: 4	43,200.00	□ \$ U	S Dollars	Local Currency	
A	pproved By	: MFLOYD		·		
8		Date:	Thursday, September 0	9, 2004	Receipt No: -345215199	
	Made By: A	ASESAY				
	Reason: F	ayment to witn	ess for Meal			
(Category: N	MEALS			Receipt 🗹	
	Amount: 5	,000.000,	□ s us	S Dollars	Se Local Currency	
\mathbf{A}_{\parallel}	pproved By:	: MFLOYD				



9	Date:	Thursday, Se	eptember 09, 2004	Receipt No: 109	5090080
-	ASESAY			\ \	
Reason:	Payment to wit	ness for weekl	y allowande in Kener		
Category:	ALLOWANCI	3		Receipt	lacksquare
Amount:	120,000.00		SUS Dollars	☑ Local Cu	rrency
Approved E	By: MFLOYI)			
10	Date:	Wednesday,	October 06, 2004	Receipt No: 130	8440286
	JTOMMY				V
					n Kenema to Freetown
Category:	TRANSPORT. G	COMMUNIC.	ATION/FEEDIN	Receipt	⊻
Amount:	70,000.00		☐ \$US Dollars	✓ Local Cui	rency
Approved B	By: MFLOYI)			
11	Date:	Thursday, D	ecember 09, 2004	Receipt No. 1103	3016501
Made By:			wasting from Vanas	mo to Frontown an	d Meals
			portation from Kener		_
Category:	TRANSPORT	MEALS		Receipt	•
Amount:	25,000.00		SUS Dollars	✓ Local Cur	rency
Approved B	y: ACOME	AU			
Γotal Disbu:	rsements §	SUS Dollars	Local Currency	Totals	No. of Payments
				315,700.00	11



4

Date:	Wednesday, October 22, 2003 Receipt No: -244124533
Made By: MSAMBA	Receipt 140: -244124555
Reason: Payment made	to Witness for support to foster parent
Category: SUPPORT	Receipt 🗹
Amount: 100,000.00	☐ \$US Dollars ☐ Local Currency
Approved By: GMORIS	SETTE
Date:	Thursday, September 09, 2004 Receipt No: -345215199
Made By: ASESAY	Thursday, September 09, 2004 Receipt No: -345215199
Reason: Payment to with	ness for Meal
Category: MEALS	Receipt 🗹
Amount: 5,000.00	□ \$US Dollars ✓ Local Currency
Approved By: MFLOYD	. *
Made By: ASESAY	Thursday, September 09, 2004 Receipt No: 1095090080 ess for weekly allowance in Kenema
Category: ALLOWANCE	ALIMAN
Amount: 120.000.00	Receipt 🗹 🗔 SUS Dollars 💆 Local Currency
Approved By: MFLOYD	☐ \$US Dollars
Tippioted by. Hit boltb	
TF1-141	
Date:	Sunday, September 28, 2003 Receipt No: 1044411844
Made By: VCHITANDA	
	Witness School fees at Holy Trinity School.
Category: SCHOOL FEES	Receipt 🗹
Amount : 50,000,00	SUS Dollars
Approved By: GMORISSET	TTE



5		Date:	Monday,	March 01,	2004	Receipt No: 1644070561	
	Made By:	MSAMBA					
	Reason:	attended Freetown	from Kenem	a for the re	-confir	nts accommodation for Witness when he/sh mation process. The bill attached represent ociated to Witness is 157,500.	its
	Category:	ACCOMMODATI	ON			Receipt 🗹	
	Amount:	157,500.00		□ s us i	Oollars	☑ Local Currency	
	Approved B	y: MFLOYD					
6	M - d - D	Date:	Tuesday, l	March 02,	2004	Receipt No: 786262717	
	-	MSAMBA			1	to very the second of the Vancous from	
	Reason:	Freetown upon the	completion of time from F	of the re-correctown wa	nfirmat as neces	itness return transport to Kenema from tion process. No signature obtained on ssary immediately negating the oportunity	to
	Category:	TRANSPORT				Receipt	
	Amount:	30,000.00		□ sus i	ollars	✓ Local Currency	
	Approved B	y: MFLOYD	:			: : : : : : : : : : : : : : : : : : : :	
7		Date:	Tuesday, !	March 02, 2	2004	Receipt No: -749131988	
	Made By:	MSAMBA					
		Kenema for the pur	pose of the re Freetown w	e-confirmat as necessar	ion pro	eals taken by Witness while in Freetown froncess. No signature obtained on receipt as ediately negating the oportunity to return to	
	Category:	MEALS				Receipt 🗹	
	Amount:	65,000.00		□ sus d	ollars	✓ Local Currency	
	Approved B	y: MFLOYD					
8		Date:	Friday, A	ugust 06, 2	2004	Receipt No: -61219138	
	Made By:	ASESAY					
	Reason:	Payment made for W medical Treatment. :	Vitness for M 5,000 for trai	ledication and	as well 38,200	as funding for Transportation to and fro for Medication	Γ
	Category:	TRANSPORT/MED	DICAL			Receipt 🔽	
	Amount: -	43,200.00		= \$US D	ollars	Local Currency	
2	Approved By	:: MFLOYI)					



9	Date	: Wednesday,	October 06, 2004	Receipt No: 130	8440286
Made By:	JTOMMY				
Reason:	Payment to w	itness for Transp	ortation/Feeding/Co	mmunication from	m Kenema to Freetowi
Category:	TRANSPOR	T/COMMUNICA	ATION/FEEDIN	Receipt	$ \mathbf{Z} $
Amount:	70,000.00		☐ \$US Dollars	Local Cu	rrency
Approved B	y: MFLOY	/D		_	
		Jitness for Transp	ecember 09, 2004 portation from Kene		nd Meals
Amount:	25,000.00		SUS Dollars	✓ Local Cu	rrency
Approved B	y: ACOMI	EAU			
Total Disbu	rsements	\$US Dollars	Local Currency ☑	<i>Totals</i> 665,700.00	No. of Payments



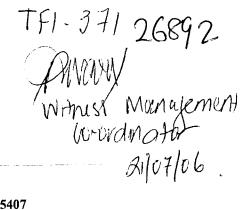
SCSLP0773

	TF1-36	31			
1		Date:	Thursday, June 10, 2004	Receipt No: 1087233193	
	Made By: Reason:	MCORDWELL Funds required to process.	facilitate the attendance of Witn		erview
	Category:	LOST WAGES/M	1EALS	Receipt 🔽	:
	_	10,000.00	☐ \$US Dollars	✓ Local Currency	
	Approved B	y: MCORDWE	ELL		·
2	Made Rv	Date:	Friday, June 11, 2004	Receipt No: -173039690	
	Reason:	Funds required to	facilitate the attendance of Witn	ness at the Special Court for In	terview
		process. LOST WAGES/N		Receipt 🗹	
		10,000.00	SUS Dollars	S Local Currency	
	Approved E		ELL	:	
3		Date:	Tuesday, December 07, 2004	Receipt No: 127256317	:
		UKAMARA Payment to witnes	ss for time wasted and lunch	: -	
		TIME WASTED, 10,000.00	/LUNCH	Receipt 🗹 S 🗹 Local Currency	
	Approved I	By: ACOMEAU	J		
				:	
4		Date:	Wednesday, December 22, 2004	Receipt No: -2025671828	
4	Made By: Reason:	UKAMARA	2004 sportation/meals on public trans	port to farcilitate witness's mov	· rement fron
4	Reason:	UKAMARA Payment for trans Makeni to Freeto	2004	port to farcilitate witness's mov	ement fron
4	Reason:	UKAMARA	2004 sportation/meals on public trans	port to farcilitate witness's move ping. Receipt	· vement fron



5		Date	e: Wednesday	, March 02, 2005	Receipt No: 124893144'	7
Made	e By:	MKOROMA	<u>.</u>			
				oortation, Meals and	l Communication	
		•			Receipt 🗹	
Categ	-					
Amo	unt:	35,000.00		SUS Dollars	Local Currency	
Appro	ved B	y: ACOM	EAU			
				•		
6		Dat	e: Monda	y, April 04, 2005	Receipt No: -201870904	13
Made	e By:	ASESAY				• • •
Rea	ason:	Being payme	ent to Witness for	Transportation, Con	mmunication and Meals to	facilitate his
		travel to Free	etown			
Cateo	orv:	TRANSPOR	T/COMMUNICA	ATION/MEALS	Receipt 🗹	
				SUS Dollars	✓ Local Currency	
Amo	ount:	40,000.00		40 0 2 011115		1
Appro	ved E	By: JBON2	ZER			
7		Dat	e: Tuesd	ay, May 17, 2005	Receipt No: -858650355	5 *
Made	e Bv:	ASESAY				
			ent to Witness for	Transportation and	Meals	,
				•	Receipt 🔽	
_		TRANSPOR	TIMEALS	C) erio p. II		
Amo	ount:	10,000.00		SUS Dollars	Local Currency	
Appro	ved E	By: PMCL	AREN			
# H				 -		
Total D	ichn	rsements	\$US Dollars	Local Currenc	y Totals No.	of Payments
I OTAL D	,19D.A	1 Sements		∠	140,000.00	7
				ت	,	





1		Date:	Thursday, November 03, 2005	Receipt No: 1131615407	
	Made By:	Aghadban			
	_	Source Developr	ment		
	Category:	INFORMATION	N	Receipt 🔽	
	Amount:		SUS Dollars	Local Currency	
	Approved By				
	Approved Dy	y. JVBBIGG			
2		· Date:	Saturday, November 26, 2005	Receipt No: 1133339371	
	Made By:	maccormack			
	Reason:				
	Category:	INFORMATION	Ĭ	Receipt 🗹	
	Amount:		✓ \$US Dollars	Local Currency	
	Approved By				;
	Approved by	, JVDDIGET			
3		Date:	Saturday, December 10, 2005	Receipt No: 1134399253	
	Mada Ry	maccormack	Saturday, December 10, 2005		
	•		eads for potential witnesses.		:
		INFORMATION		Receipt 🔽	
	Amount: 2		SUS Dollars	Local Currency	
	Approved By	y: JVBERRY			
	ripproved by				:
4		Date:	Sunday, February 12, 2006	Receipt No: 1140436636	
	Made By:	PMCLAREN			
	Reason:	Temporary Prote	ctive Measures costs		
	Category:	PROPERTY		Receipt	
	Amount: 3	3,000.00	SUS Dollars	Local Currency	
	Approved By	: GMORISS	ETTE		



5		Date:	Wednesday, March 22, 2006	Receipt No: 1143539932	
	Made By: R	LARDER			
	Reason: Tr	ravel to meet with	n handlers		
	Category: The	RANSPORT		Receipt 🔽	
	Amount: 80	0,000.00	SUS Dollars	✓ Local Currency	
	Approved By:	GMORISSET	TTE		
				•	
6		Date:	Friday, April 21, 2006	Receipt No: 1145954517	
	Made By: R	LARDER			
	•		, lost wages and med expenses.		
	Category: FA	AMILY		Receipt 🗹	
	Amount: 3,		▼ \$US Dollars	Local Currency	
	Approved By:			· :	
	**				
					:
7		Date:	Thursday, June 01, 2006	Receipt No: 1841332631	
	Made By: ln	naccormack			
		elocation expense	es for witness	* · · · · · · · · · · · · · · · · · · ·	
	Category: Pl	ROPERTY		Receipt	
	Amount: 74	10.00	SUS Dollars	Local Currency	
	Approved By:		TTE	:	
8		Date:	Tuesday, June 20, 2006	Receipt No: -134960210	:
	Made By: R	LARDER			
	Reason: Co	osts associated wi	th relocation		
	Category: Pl	ROPERTY		Receipt [
	Amount: 2,6	030.00	✓ \$US Dollars	Local Currency	
	Approved By:	GMORISSET	CTE		



Total Disbursements	\$US Dollars	Local Currency	Totals	No. of Payments
	<u> </u>	() () () () () () () () () ()	9,070.00	7
	<u> </u>	₹	30,000.00	1



SCSLP0795

sday, October 22, 2003	Receipt No:	
	-	
wn witness for time wasted	d and lost wages	
VASTED	Receip	t 🗹
SUS Dollars	M Local Cu	ırrency
	:	:
day October 22, 2002 I	Doggart No.	
day, October 23, 2003 - 1	kece.pt No:	
n witness for time wasted		
	Receipt	
SUS Dollars	-	
	Zoval Cu	
lay, October 23, 2003 R	Receipt No:	
n witness for time wasted.		•
	Receipt	②
SUS Dollars	✓ Local Cui	rency
:		:
rs Local Currency	Totals	No. of Payments
	wn witness for time wasted VASTED SUS Dollars day, October 23, 2003 In witness for time wasted lay, October 23, 2003 Rus Dollars n witness for time wasted.	wn witness for time wasted and lost wages VASTED Receip SUS Dollars Local Cu day, October 23, 2003 Rece pt No: Receipt SUS Dollars Local Cu Receipt An witness for time wasted. Receipt Receipt Receipt Receipt



SCSLP0752

1	Date:	Tue	sday, May 04, 2004	Receipt No: 1	083771824
Made By:	MCORDWELL	_		•	
Reason:	Payment to Wit 5,000 and lost v	ness to cover vages, 5,000	costs for accommod while attending the S	lation, 25,000, me Special Cort for in	eals,10,000, transportation, avestigative purposes.
Category:	ACCOMODAT TION AND LO	ION,MEAL ST WAGES	S,TRANSPORTA	Recei	pt 🗹
Amount:	45,000.00		SUS Dollars	Local C	urrency
Approved B	y: PHALLOF	RAN			<u> </u>
TF1-35	66				
2 Made By:	Date: MCORDWELL	Fric	lay, April 16, 2004	Receipt No: 10	82116255
	investgative purp	oses. 3 nigh	e the attendance of Wats accomodation utilization to Makeni.	itness at the Specised at Avancer M	ial Court from Makeni for Motel Transportation
Category:	ACCOMMODA'	TION/MEA	LS/TRANSPORT	Receip	t 🗸
Amount: 1	25,000.00		SUS Dollars	☑ Local Cu	rrency
Approved By	: PHALLOR	AN			4 •
3	Date:	Wednesd	ay, May 05, 2004	Receipt No: 146	6379761
Made By: N	MCORDWELL			-	
tr	ayment to Witne ansportation to Native proc	Makeni, 20,0	osts for accommodat 00, and medical supp	ion, 25, 100, meal dies,37,500 upon	ls, 10,000, return the completion of the
	CCOMMODAT RANSPORTAT			Receipt	
Amount: 92	2,500.00		SUS Dollars	✓ Local Cur	rency
Approved By:	PHALLORA	.N	·		
Total Disburs	ements \$US	S Dollars	Local Currency	Totals 262,500.00	No. of Payments

Annex C – Excessive or Duplicative Payments



3

4

Special Court for Sierra Leone All Disbursements for Witness

SCSLP0437

TF2 -	- 027/TF1-03	35	
1	Date	e: Thursday, January 15, 2004	Receipt No: -1258552211
Made By	: MKOROMA		
Reason			tness at the Special Court field location for for feeding in the amount of 5,000 leones.
Category	: TRANSPOR	T/ LOST WAGES/FOOD	Receipt 🗹
Amount	: 32,000.00	☐ \$US Dollars	s 🗹 Local Currency
Approved	By: tgbekie		
TF2-0	27/TF1-035		
2	Date:	Thursday, January 15, 2004	Receipt No: 371723477
Made By:	ASESAY		
Reason:	Kenema for the		ness at the Special Court field location in ee note on original receipt held on file whice
Category:	TRANSPORT	/LOST WAGES	Receipt 🗹
Amount:	27,000.00	SUS Dollars	✓ Local Currency
Approved B	y: tlahun		
	Date:	Friday, February 04, 2005	Receipt No: -531339795
Made By:	MKOROMA		1 1 1 1
Reason:	Payment to witn	ness for Meals.	
Category:	MEALS		Receipt 🗹
Amount: 1	0,000.00	☐ \$US Dollars	Local Currency
Approved By	: ACOMEA	U	
	Date:	Tuesday Fahmany 15 2005 D	1004C7001
Made By: JI		Tuesday, February 15, 2005 R	Receipt No: 1108467891
•		ess for reimbursement for lost funds	
Category: R	EIMBURSEME	ENT	Receipt 🗹
Amount: 14	0,000.00	. SUS Dollars	✓ Local Currency
Approved By:	ACOMEAU	1	



3	D.	ate: wednesd	lay, March 16, 2005	Receipt No: 73.	20 / 2880
Made By:	ASESAY				
Reason:	Payment to prepping.	witness for trans	sport /meals/communi	cation to travel to	Freetown from Bo for
Category:	TRANSPO	PRT		Receipt	t 🗹
Amount:	35,000.00		☐ \$US Dollars	✓ Local Cu	rrency
Approved B	y: ACO	MEAU			
6	Da	te: Monda	y, March 21, 2005	Receipt No: 111	1404960
Made By:	JBONZER				
Reason:	Fransport h	ome from Specia	Court after meeting v	with Witness Man	agement Unit
Category:	ΓRANSPO	RT		Receipt	$ \boxtimes $
Amount: 4	0,000.00		☐ \$US Dollars	☑ Local Cur	rency
Approved By	: ACOM	IEAU			: :
				; ;	:
Total Disburs	ements	\$US Dollars	Local Currency	Totals	No. of Payments
			\checkmark	284,000.00	6



4

1	Date:	Wednesday, October	23 2002	Paraint Vo. 200	2644146	
Made By: GMO		wednesday, October	25, 2002	Receipt (10, 209)	2044140	
Reason: Payme		to cove	r cost assoc	iated to Maintenan	ice \$250 USI)
Category: MAI	NTENANCI			Receipt		
Amount: 250.00		_	US Dollars			
	GMORISSE		JO DOMAIS	- Local Cul	rency	
Approved By:	JIVIONISSE	TIL				
2	Date:	Friday, November (01, 2002	Receipt No: 4739	21712	
Made By: GMOI	RISSETTE					
Reason: Payme	nt made to	to cover	cost associ	ated to Maintenand	e \$ 100 USE).
Category: MAIN	TENANCE	·		Receipt	\checkmark	
Amount: 100.00		☑ su	S Dollars	☐ Local Curr	ency	
Approved By: G	MORISSE	ГТЕ	:		1	:
				:	·	
	Date: ISSETTE at made to	Monday, February 1		Receipt No: 20264	:	catio
Made By: GMOR Reason: Paymen Medica	Date: ISSETTE at made to	Monday, February 1	: cost associa	· :	on, Commun	catio
Made By: GMOR Reason: Paymen Medica Category: TRANS	Date: ISSETTE at made to SPORT/ME.	Monday, February 1' to cover o	: cost associa	ted to Transportation	on, Commun	cation
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000	Date: ISSETTE at made to SPORT/ME.	Monday, February 1' to cover of to COMMUNIC	: cost associa CATIO	ted to Transportation	on, Commun	catio
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000 Approved By: GM	Date: ISSETTE at made to SPORT/ME .00 MORISSET	Monday, February 17 to cover of the cover o	CATIO Dollars	Receipt - Local Curre	on, Commun	catio
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000 Approved By: GM	Date: ISSETTE at made to BPORT/MED OO MORISSET Date: Wee	Monday, February 1' to cover of to COMMUNIC	CATIO Dollars	ted to Transportation	on, Commun	cation
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000 Approved By: GM	Date: ISSETTE at made to SPORT/ME .00 MORISSET Date: Wee	Monday, February 17 to cover of the cover o	CATIO Dollars	Receipt - Local Curre	on, Commun	catio
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000 Approved By: GM Made By: JBERRY Reason: Payment	Date: ISSETTE at made to SPORT/ME .00 MORISSET Date: Wee	Monday, February 17 to cover of the cover o	CATIO Dollars	Receipt \(\subseteq \) Local Curre eccipt No: -18855	on, Commun	cation
Made By: GMOR Reason: Paymen Medical Category: TRANS NS Amount: 120,000 Approved By: GM	Date: ISSETTE at made to SPORT/ME .00 MORISSET Date: Wee	Monday, February 17 to cover of the cover o	CATIO Dollars , 2003 R	Receipt \(\sum \) \[\sum \] Local Curre \[\text{eccipt} \ \sum \)	on, Commun	cation



Date: Saturday, February 22, 2003 Receipt No: -919685313	
Made By: JBERRY Reason: Payment made to to cover cost associated to Meals	
Category: MEALS Receipt	
Amount: 5,000.00 * SUS Dollars 🗹 Local Currency	
Approved By: JBERRY	
Date: Tuesday, February 25, 2003 Receipt No: -866010489 Made By: GMORISSETTE	
Reason: Payment made to to cover cost associated to Transportation and Commun	ication
Category: TRANSPORT/COMMUNICATION Receipt ✓	
Amount: 100,000.00 * SUS Dollars	
Approved By: GMORISSETTE	
	:
7 Date: Tuesday, March 04, 2003 Receipt No: -108850244	
Made By: GMORISSETTE Reason: Payment made to to cover cost associated to Transportation and Communication and Communica	aation
	Jation
Category: TRANSPORT/COMMUNICATION Receipt ✓	
Amount: 50,000.00 SUS Dollars 52 Local Currency	
Approved By: GMORISSETTE	
8 Date: Saturday, March 08, 2003 Receipt No: -490381299	
Made By: GMORISSETTE	:
Reason: Payment made to to cover cost associated to Maintenance	
Category: MAINTENANCE Receipt 🗹	-
Amount: 250,000.00 😌 US Dollars 💆 Local Currency	
Approved By: GMORISSETTE	



9	Date:	Monday, March 10, 2003	Receipt No: -235611901
Made By: S	SWEHRENBERG		
Reason: F	Payment made to	to cover cost associated	to Meals
Category: M	VIEALS		Receipt 🗹
Amount: 8	6,000.00	☐ \$US Dollars	☑ Local Currency
Approved By	: SWEHRENBE	RG	
10 Made By: S	Date:	Monday, March 10, 2003	Receipt No: -1287810998
	ayment made to	to cover cost associ	iatec to Maintence
	MAINTENANCE		Receipt 🗹
Amount: 1		☐ \$US Dollars	☑ Local Currency
Approved By:		RG	
	1		
11	Date:	Sunday, October 26, 2003	Receipt No: 1929355211
Made By: G	MORISSETTE		
Reason: Pa	ayment made to	to cover cost associa	ated to Maintenance \$200 USD
Category: M	LAINTENANCE		Receipt 🗹
Amount: 20	00.00	☑ \$US Dollars	[] Local Currency
Approved By:	GMORISSETTI	3	
<u> </u>			
		•	
12	* 7	nesday, October 29, 2003 F	Receipt No: -1107780715
-	MORISSETTE		
Reason: Pa	yment made to	to cover cost associa	ted to Transportation
Category: TR	CANSPORT		Receipt 🗹
Amount: 20,	00.000	□ \$US Dollars	☑ Local Currency
Approved By:	GMORISSETTE		



13	Date:	Monday, I	December 01, 200	O3 Receipt No:	-1181329679	
Made By: GMC	RISSETTI	Ε				
Reason: Paym	ent made to		to cover cost a	ssociated to Transp	ortation and	Communication
Category: TRA	NSPORT/C	OINUMMO	CATIONS	Rece	eipt 🗹	
Amount : 30,00	0.00		☐ \$US Dol	lars 🗹 Local	Currency	
Approved By:	GMORISS!	ETTE				

14	Date:	Friday,	February 20, 200	4 Receipt No: -	2024494858	
Made By: JBER	R'Y					
Reason: Payme	nt made to		to cover cost as	sociated to Meals		
Category: MEAI	.S			Recei	pt 🗹	
Amount: 5,000.0	00		☐ \$US Doll:	ars 🗹 Local C	Currency	
Approved By: J	BERRY					•

	•				; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;	:
Total Disburseme	nts <i>\$U</i> S	S Dollars	Local Currer	icy Totals	No. of P	Payments
		V		550.00		3
	,	*· *	· <u>\</u>	771,000.00		11



4

Special Court for Sierra Leone All Disbursements for Witness

SCSLP0757 TF1-139

1	Dute. Saturday, 110 verificit 25, 2002 Receipt 110. 5500515	54
	Made By: AWHITE Reason: Payment made to SCSLP0757 for Air Ticket to Ghana to US, by Al White	.
	Category: Receipt	
	Amount: 1,453.00 SUS Dollars Local Currency	y
	Approved By: AWHITE	
		
	TF1-139	
2	Date: Monday, February 18, 2002 Receipt No: 32212783. Made By: AWHITE	3
	Reason: Payment made to SCSLP0757 for communications, top up card, by Al Wh	ite.
	Category: COMMUNICATION Receipt ✓	
	Amount: 100.00 SUS Dollars Local Currency	:
A	Approved By: AWHITE	
3	Date: Wednesday, November 06, Receipt No: 182228831	0
	Made By: AWHITE	
	Reason: Payment made to SCSLP0757 for communications by Al White.	
	Category: COMMUNICATION Receipt	
	Amount: 100.00 SUS Dollars Local Currency	
A	Approved By: AWHITE	
1	Date: Thursday, November 14, 2002 Receipt No: 1463523583	}
I	Made By: AWHITE	
	Reason: Payment made to SCSLP0757 for communication, top up cards, by Al White	•
(Category: COMMUNICATIONS Receipt	
	Amount: 200.00	
AĮ	approved By: AWHITE	·



3		Date:	Monday, I	November 18, 2002	Receipt N	0: 1/31103237	
Made B	y: AV	VHITE					
Reason	n: Pay	ment made to	SCSLP075	7 for communicatio	ns, top up ca	rd , by Al White.	
Category	y:				R	Receipt 🗹	
Amount	t: 100	0.00		☑ \$US Dollar	s 🗆 Loc	cal Currency	
Approved	By:	AWHITE					
• • • • • • • • • • • • • • • • • • • •							
6		Date:	Friday, I	December 13, 2002	Receipt No	o: 1727444399	
Made By							
Reason	Pay	ment made in eceipt obtain	n incurred lo ed. And also	dging expenses paid extra payment of \$	l on behalf of 40 in additio	f SCSLP0757 in ona to the \$780, b	Accra, Ghay y Al White
Category	: LO	DGING EXP	ENSES		R	eceipt 🔽	
Amount	: 820	.00		✓ \$US Dollars	i ☐ Loc	al Currency	
Approved	Ву:	AWHITE					
-					:	1 1 1 1	:
1		Date:	Wednesd	ay, December 18, 2002	Receipt No	o: 1089574572	
Made By	: AW	HITE					
Reason	_	nent for SCSI stigation.	LP0757 for 1	lodging expenses in	Accra Ghan	a pending FBI ve	tting
Category:	LOI	GING EXPE	ENSES		Re	eceipt 🗹	
Amount:	517.:	31		SUS Dollars	[] Loca	al Currency	
Approved I	3у:	AWHITE					
		Date:	Wednesda	y, December 18, 2002	Receipt No:	: -959052739	
Made By:	AWF	HITE					
Reason:	Paym	ent made to S	SCSLP0757	for Air Ticket to Gh	iana to US,pa	aid to KLM by A	1 White.
Category:	TICK	ET FEE			Red	ceipt 🗹	
Amount:	150.0	0		✓ \$US Dollars	[Local	l Currency	
Approved B	v:	AWHITE					



9	Date:	Thursday, December 19, 2002	Receipt No: 1705967316	
Made By	: AWHITE			
Reason	Payment made t	to SCSLP0757 for subsistance allo	owance by Al White.	
Category	SUBSISTANC	E ALLOWANCE	Receipt 🗹	
Amount:	281.00	 ▼ \$US Dollars	[] Local Currency	
Approved l	By: AWHITE			
فالبارية والمسبب				
10	Date:	Tuesday, December 31, 2002	Receipt No: -642937670	
•	AWHITE			
Reason:	Payment to pure Monrovia/Ghans	hase Airline Tickets for SCSLP07 a/US.	'57, Wife and Eight(8) Chil	dren to
Category:	AIRLINE TICK	ET	Receipt 🗹	
Amount:	4,700.00	✓ \$US Dollars	[] Local Currency	
Approved I	By: AWHITE	· · · · · · · · · · · · · · · · · · ·		
				; ;
11	Date:	Wednesday, January 08, 2003	Receipt No: 1089624212	
•	AWHITE			
Reason:	Payment obtain and Nine (9) fam	lodging, purchase clothing, food and its members.	nd miscellaneous expenses	for SCSLP075
Category:			Receipt 🗹	
Amount:	6,180.00	✓ \$US Dollars	Local Currency	
Approved B	y: AWHITE			
12	Date:	Friday, October 31, 2003	Receipt No: -1447738555	
Made By:		acai nozez for communications	ton un card and subsistance	e for family by
	Payment made to Al White.	SCSLP0757 for communications,		o tor failing, of
Category:	COMMUNICAT	TONS	Receipt 🗹	
Amount:	500.00	✓ \$US Dollars	Local Currency	
Approved B	y: AWHITE			



TF1-151

Date:	Thursday, December 12, 2002	Receipt No: 523869625	
Made By: AWHITE Reason: Payment made b	y Gerry Stevens on behalf of OTF	P lir vestigations.	
Category: MAINTENANC		Receipt 🗹	
Amount: 392,000.00	□ \$US Dollars	•	
Approved By: AWHITE	a woo bonars	in about currency	
Tipproved by:			
2 Date:	Thursday, December 12, 2002	Receipt No: 390993981	
Made By: AWHITE Reason: Payment made to	by Al White for clot	hin and luggage	
Category: CLOTHING AN		Receipt 🗹	
Amount: 400.00		Local Currency	
Approved By: AWHITE			1 1
3 Date: Made By: GMORISSETTE Reason: Payment made to	Monday, December 16, 2002 I		·
Category: MAINTENANCE		Receipt 🗹	
Amount: 50,000.00	SUS Dollars	53 Local Currency	
Approved By: AWHITE			
	1		: :
Made By: GMORISSETTE	Monday, December 16, 2002 Roohn Berry on behalf of OTP Inves		
•			luei.
Category: PURCHASE OF FU	SUS Dollars	Receipt 🗹	
Amount: 50,000.00 Approved By: AWHITE	= 505 Dollars	✓ Local Currency	····



8

5 Date: Monday,	December 16, 2002	Receipt No: -1241502325
Made By: GMORISSETTE		
Reason: Payment for maintenance maintenanc	ade by J. Harding on	behalf of OTP Investigations.
Category: MAINTENANCE		Receipt 🗹
Amount: 196.00	☑ \$US Dollars	Local Currency
Approved By: AWHITE		
6 Date: Tuesday, I Made By: tlahun	December 17, 2002	Receipt No: 1641960434
Reason: Payment made by Thomas La	thun for meals on beh	alf of OTP Investigations.
Category: MEALS		Receipt 🗹
Amount: 105,000.00	☐ SUS Dollars	☑ Local Currency
Approved By: AWHITE		
Date: Tuesday, D Made By: GMORISSETTE Reason: Payment made by John Berry		Receipt No: 313713520
Category: MAINTENANCE		Receipt 🗹
Amount: 27.00	☑ \$US Dollars	☐ Local Currency
Approved By: AWHITE		
Potos Thursday Da	combor 10, 2002 - D	laccint No. 12702/2127
Date: Thursday, De Made By: GMORISSETTE	cember 19, 2002 R	leccipt No: -1379362127
Reason: Payment made by Bob parnell of	on behalf of OTP Inve	estigations for maintenance.
Category: MAINTENANCE		Receipt 🗹
Amount: 2,000.00	☑ \$US Dollars	Local Currency
Approved By: AWHITE		·



Date:	Wednesday, January 15, 2003	Receipt No: -1825266617
Made By: AWHITE		1
Reason: Payment made for	or maintenance by Desmond de S	ilva on behalf of OTP Investigations.
Category: MAINTENANC	E	Receipt 🗹
Amount: 75.00	SUS Dollars	☐ Local Currency
Approved By: AWHITE		
10 Date: Made By: GMORISSETTE	Wednesday, January 15, 2003	Receipt No: -1099024610
Reason: Payment made for	maintenance on behalf of OTP I	nvestigations.
Category: MAINTENANCE		Receipt 🗹
Amount: 17,500.00	☐ \$US Dollars	☑ Local Currency
Approved By: AWHITE		
Date: Made By: AWHITE Reason: Payment made by I Category: TRANSPORTATIO Amount: 1,550.00 Approved By: AWHITE	ouise Taylor on behalf of OTP Ir	Rece pt No: 446212732 Elece pt No: 446212732 Receipt Local Currency
Date: Made By: AWHITE Reason: Payment made for made Category: MAINTENANCE Amount: 10,000.00	aintenance by Louise Taylor on b	ceipt No: 151085005 ehalf of OTP Investigations. Receipt Local Currency
Approved By: AWHITE		



13	Date:	Thursday, January 30, 2003	Receipt No: -2087713526	
Made By:	AWHITE		,	
Reason:	Payment made by	Chris Santora for Visa photo	graphs on behalf of OTP Investig	gations.
Category:	VISA PHOTOGR	APHS	Receipt 🗹	
Amount:	10,000.00	☐ \$US Dolla	rs 🗹 Local Currency	
Approved B	y: AWHITE			
14	Date:	Friday, January 31, 2003	Receipt No: 358080195	
Made By: A		·		
Reason: P	ayment made by L	ouise Taylor on behalf of OT	P Investigations.	
Category: N	MAINTENANCE (CLOTHING)	Receipt 🗹	
Amount: 7	8,000.00	☐ \$US Dollars	☑ Local Currency	
Approved By:	AWHITE			
. ~		i .		
15		iursday, February 13, 2003	Receipt No: -732603832	
	MORISSETTE	T Doole C		
	;a	SLP0217 for transportation ar	nd communication.	
	CANSPORTATION MMUNICATION		Receipt 🗹	
Amount: 238	3.00		Local Currency	
Approved By:	AWHITE	• .		
16	Date: Wedn	esday, February 26, 2003 [Receipt No: 740134569	
Made By: AW	HITE			
Reason: Payr	nent made by Desr	nund de Silva on behalf of O	TP Investigations.	
Category: COM	MUNICATIONS		Receipt 🗹	
Amount: 2,204	4,000.00	SUS Dollars	✓ Local Currency	
Approved By:	AWHITE		·	



Total Disbursements	\$US Dollars	Local Currency	<i>Totals</i> 4,486.00	No. of Payments
	<u> </u>	$\overline{\mathbf{Z}}$	2,916,500.00	9



Amount: 10,000.00

MCORDWELL

Approved By:

Special Court for Sierra Leone All Disbursements for Witness

TF1-360 Date: Receipt No: Made By: Reason: Category: Receipt 🗆 Amount: 0.00 SUS Dollars Local Currency Approved By: 2 Date: Receipt No: Made By: Reason: Category: Receipt 🗆 Amount: 0.00 SUS Dollars Local Currency Approved By: 3 Date: Receipt No: Made By: Reason: Category: Receipt 🗍 Amount: 0.00 SUS Dollars Local Currency Approved By: 4 Date: Friday, June 04, 2004 Receipt No: 865055552 Made By: YDAFAE Reason: Funds required to facilitate the attendance of Witness at the Special Court for Investigative Category: FOOD Receipt 🗹

La SUS Dollars

Page 1 of 12

M Local Currency



5		_			.01 //	ithe33	
J		Date:	Fric	lay, June 11, 2004	Receip	it No: 1395631	316
	Made By: Mo						
	MC430H: FU	nus required to	tacilitate the	e attendance of Wit	ness the S	pecial Court for	r Interview process.
	Category: LO	ST WAGES/	MEALS			Receipt 🗹	
	Amount: 15,	000.00		SUS Dollar	s 2	Local Currenc	y
	Approved By:	MCORDW	ELL				
6	Made By: UK	Date:	Friday, De	ecember 10, 2004	Receipt	No: 20426011	35
	Reason: Pay	ment to witner	ss for Lost wa	ages and Meals			
	Category: LOS	ST WAGES/N	ÆALS			Receipt 🗹	
	Amount: 10,0	00.00		SUS Dollars	2 1	ocal Currency	,
,	Approved By:	ACOMEAU				our oney	
							
7		Date:	Wednesday	7, December 22,	Receip	No: -18785344	09
	Made By: UK						
	Reason: Payn for p	nent for transp repping by Pr	ort/meals for osecuting cou	witness to travel to insel.	o Freetov	n from Tom	on public transport
	Category: TRA	NSPORT				Receipt 🗹	
	Amount: 25,00	00.00		SUS Dollars		ocal Currency	:
A	pproved By:	MSAMBA				- var cuty	
8	Made By: ASES	Date:	Monday,	April 04, 2005	Receipt 1	to: 1826926346	
			Vitness for M	eals whilst travelling	na to E	tov-	
(Category: MEA			···mior davCitti			
	Amount: 10,000			Clere n		Receipt 🗹	:
	•	BONZER		SUS Dollars	Y L,	cal Currency	
•							



9 Da	te: Tuesday, May 17, 2005	Receipt No: 1751974076
Made By: ASESAY	• •	1,000,740,70
Reason: Being paym	ent to Witness for Transportation an	d Meals
Category: TRANSPOR	RT/MEALS	Receipt 🗹
Amount: 10,000.00	☐ SUS Dollar	<u>-</u>
Approved By: MCLA	REN	- Carreacy
10 Dat	e: Tuesday, May 17, 2005	Descine N. Add Connects
Made By: ASESAY	1 desday, way 17, 2003	Receipt No: 1116502919
	ent to Witness for Medication.	
Category: MEDICAL	TO THE STATE OF TH	
Amount: 10,000.00		Receipt 🗹
	SUS Dollars	3 ✓ Local Currency
Approved By: MCLA	REN	
11 Date Made By: ASESAY	Tuesday, June 07, 2005	Receipt No: 1118673031
Reason: Being paymen	nt to witness for Transport from	to Freetown /Meals and Communication
Category: TRANSPOR	T/ MEALS/COMMUNICATION	Receipt 🗹
Amount: 40,000.00	SUS Dollars	
Approved By: PMCLA	REN	
12 Date:	Tuesday, June 07, 2005	Receipt No: -630258102
Reason: Being paymen	t to witness for Transport	
Category: TRANSPORT	•	Receipt 🗹
Amount: 5,000.00	SUS Dollars	☑ Local Currency
Approved By: PMCLA		



Date: Monday, January 23, 2006 Receipt No: 1138194543 Made By: ASESAY Reason: PAYMENT MADE TO WITNESS FOR TRANSPORTATION TO FERCILITATE HIS MOVEMENT WITHIN FREETOWN. Category: TRANSPORT Receipt 🗹 Amount: 10,000.00 SUS Dollars ☑ Local Currency Approved By: **PMCLAREN** Date: Wednesday, January 25, 2006 Receipt No: -1277958780 Made By: ASESAY Reason: PAYMENT MADE TO WITNESS FOR TOP UP CARD TO FERCILITATE COMMUNICATION BETWEEN HIMSELF AND THE OTP. Category: INFORMATION Receipt 🗹 Amount: 15,000.00 │ SUS Dollars ☑ Local Currency Approved By: **PMCLAREN** 1.5 Date: Thursday, January 26, 2006 Receip: No: 1138271791 Made By: PMCLAREN Reason: Accomodation, meals, assistance, and top up card for the next two days that this witness is assisting us. Category: TRANSPORT Receipt 🗹 Amount: 100,000.00 SUS Dollars ☑ Local Currency **GMORISSETTE** Approved By: 16 Friday, February 03, 2006 Receipt No: 1138969621 Date: Made By: PMCLAREN Reason: Accomondations, meals, repairs to motor vehicle and to top up phone card for two days that this witness is assisting us Category: TRANSPORT/ LOST WAGES Receipt 🗹 Amount: 250,000.00 SUS Dollars I Local Currency Approved By: **PMCLAREN**

Page 4 of 12



17	Date:	Monday, February 06, 2006	Receipt No: 1140001849	
Made By:	RLARDER			
Reason:		meals and transport er source information in assistin	g in locating witness for Pros	ecutors Office
Category:	INFORMATION		Receipt 🗹	
A.mount:	500,000.00	SUS Dollars	☑ Local Currency	
Approved B	y: GMORISSE	TTE		
			<u> </u>	
18	Date:	Tuesday, February 07, 2006	Receipt No: 1139328993	
Made By:	UKAMARA			
Reason:	I night accommoda investigational mat	ation plus transport and meal to ters.	subject whilst assisting us wi	th
Category:	INFORMATION		Receipt 🗹	
Amount:	50,000.00	SUS Dollars	☑ Local Currency	
Approved B	y: PMCLAREN	I		
•	Date: RLARDER Source Information		Receipt No: 1140527025	
Category:	INFORMATION		Receipt 🗹	
Amount:	350,000.00	SUS Dollars	☑ Local Currency	
Approved B	y: PMCLAREN	; :	<u>:</u> :	
20	Date:	Sunday, April 02, 2006	Receipt No: 1139063491	
•	PMCLAREN			
	3 nights accomodat 3 days meals - LE 3			
Category:	INFORMATION		Receipt 🗹	
Amount:		— ·	and the second second	
	150,000.00	SUS Dollars	🗹 Local Currency	

Page 5 of 12



21	Date:	Tuesday, November 21, 2006	Receipt No: 948527653	
Made By:	SSWART		,	
Reason:	Le. 45,000 - Co:	sportation to Waterloo to collect st of new tyre for motor bike - wit front tyre needed to be completely	mess role from to Freetown to	enable
Category:	TRANSPORT		Receipt	
Amount:	50,000.00	SUS Dollars	✓ Local Currency	
Approved B	y: SSWART		•	
22	Date:	Thursday, December 07, 2006	Receipt No: 497946647	
Made By:	SNIEMI		10000176 1101 -472740047	
Reason:	Family assistance	e while witness doing prepping fo	or CT trial	
Category:	FAMILY		Receipt 🗹	
Amount:	50,000.00	SUS Dollars	☑ Local Currency	
Approved B	y: RLARDER			
23	Date:	To do D		•
Made By:	UKAMARA	Tuesday, December 12, 2006	Receipt No: 1165912967	
		nily assistance while witness at SC	SL for prepping,	
Category:			Receipt 🗹	
Amount:	50,000.00	SUS Dollars	☑ Local Currency	
Approved By	: RLARDER		÷ • • • • • • • • • • • • • • • • • • •	
24 Made By: I	Date:	Saturday, January 27, 2007	Receip: No: -566075004	
Reason: P	ayment for Translarification/prepr	sportation and Meals for witness - oing interviews	to Freetown, for	
Category: 7	RANSPORT/M	EALS	Receipt 🗆	
Amount: 3	0,000.00	SUS Dollars	☑ Local Currency	
Approved By:	SSWART			



	in Dispursements 10	r Witness
25 Date: Made By: CMORRIS	Wednesday, March 14, 2007	Receipt No: 1179331518
	on	
	on required by Investigations	
Category: INFORMATION	ſ	Receipt 🗔
Amount: 30,000.00	SUS Dollars	🗹 Local Currency
Approved By: JVBERRY		
26 Date: Made By: AKOMEH	Thursday, April 05, 2007	Receipt No: 1865043856
Reason: Being papyment to	o wiwtness for transportation from	to freetown and lost wages
Category: TRANSPORT/ Lo		Receipt 🗹
Amount: 120,000.00	i] \$US Dollars	· · · · · · · · · · · · · · · · · · ·
Approved By: RDIACK	409 Doll312	☑ Local Currency
TP TO DJ. TO DICK		
27 Date: Made By: AKOMEH	Monday, April 16, 2007	
		vaccination card and lost wages
Category: Lost wages/ Vacing	ation card/Passport photos	Receipt 🗹
Amount: 25,000.00	SUS Dollars	☑ Local Currency
Approved By: RDIACK	:	
	<u> </u>	
28 Date: Made By: AKOMEH	Monday, April 16, 2007 R	eceipt No: -1536901289
	e to witness for I	
Catagoria LOCT WACEGO	to widiess for Lost wages, pass	port photos and Vaccination card.
Category: LOST WAGES/Pas card	sport photo/Vaccination	Receipt 🗹
Amount: 25.00	SUS Dollars	☑ Local Currency
Approved By: RDIACK		



29 Date:	Wednesday, July 18, 2007	Receipt No: -612832866
Made By: SSWART		
Reason: Top Up Card p	rovided to enable witness to make	contact with OTP
Category: COMMUNICA	ATION	Receipt 🗆
Amount: 30,000.00	☐ SUS Dollars	Local Currency
Approved By: SSWAR		
30 Date:	Thursday, July 19, 2007	Receipt No: -12434177
Made By: SSWART	•. •	•
Reason: Medical Expen	ses due to malaria and subsequent	hospit ilisatoin.
Category: MEDICAL		Receipt
Amount: 50,000.00	SUS Dollars	Local Currency
Approved By: SSWAR	.	
	· · · · · · · · · · · · · · · · · · ·	
31 Date	T 1	
Made By: CMORRIS	Friday, July 20, 2007	Receipt No: 1184935689
Reason:		
Category: COMMUNICA	TION	n 🗆
	<u>_</u>	Receipt 🗔
Amount: 30,000.00	SUS Dollars	63 Local Currency
Approved By: SSWAR1		
32 Date:	Tuesday, August 14, 2007	Receipt No346036784
Made By: ISESAY	t dooday, ringust 21, 2001	1000 pt 1101 -340/30/04
•	FOR COMMUNICATION WITE	SCSI, WITHINVESTIGATORS AND
Category: COMMUNICA	TION	Receipt
Amount: 130,000.00	SUS Dollars	Local Currency
Approved By: RDIACK	•	

Page 8 of 12



33 Date:	Wednesday, September 05, Receipt No: 611518933	
Made By: SSWART		
Reason: Top Up Card to fa	cilitate communication with OTP dur ng clarification interviews	
Category: COMMUNICATI	ON Receipt 🗆	
Amount: 15,000.00	SUS Dollars all Local Currency	
Approved By: SSWART		
34 Date:	Wednesday, September 12, Receipt No: 1189607893	
Made By: PTRAINOR Reason:		
Category: Communication	Receipt ✓	
Amount: 30,000.00	SUS Dollars 3 Local Currency	
Approved By: PTRAINOR		
35 Date: T Made By: PTRAINOR Reason:	hursday, September 13, 2007 Receipt No: 1189678557	
Category: Communication	Receipt 🗹	
Amount: 30,000.00	☐ SUS Dollars	
Approved By: PTRAINOR		
36 Date:	Wednesday, September 19, Receipt No: 1156647253	
Made By: PTRAINOR Reason:		
Category: Communication	Receipt 🗹	:
Amount: 30,000.00	U SUS Dollars	
Approved By: PTRAINOR		



37 Date:	Wednesday, October 10, 2007	Receipt No: 1192012971
Made By: RDIACK		
Reason: TOP UP CARD	AND REPAIRS TO SMALL GE	NERATOR 30,000 PLUS 30,000
Category: COMMUNICA	TION	Receipt
Amount: 60,000.00	🗀 SUS Dollars	✓ Local Currency
Approved By: RDIACK		
38 Date:	Tuesday, November 06, 2007	Receipt No:
Made By: PTRAINOR		
Reason:		
Category: Communication		Receipt 🗹
Amount: 30,000.00	□ SUS Dollars	Local Currency
Approved By: PTRAINO	R	
39 Date: Made By: PTRAINOR Reason:	Monday, November 19, 2007	Receipt No: 1455761055
Category: Meals		Receipt 🗹
Amount: 10,000.00	SUS Dollars	✓ Local Currency
Approved By: PTRAINO	R :	<u>:</u>
40 Date: Made By: PTRAINOR Reason:	Thursday, November 22, 2007	Recei at No: 1195743346
Category: Communication		Receipt 🗹
Amount: 30,000.00	SUS Dollars	•
	S GGG DOMAIS	



41 Date:	Tuesday, December 04, 2007	Receipt No: 1196778941	
Made By: RDIACK			
Reason: Communication	- as sub resides in remoe village		
Category: INFORMATIO	N	Receipt 🗹	
Amount: 30,000.00	SUS Dollars	Local Currency	
Approved By: RDIACK			
42 Date:	Tuesday, December 04, 2007	Receipt No: 1196768925	
Made By: PTRAINOR			
Reason: Money paid to r	epair motorbike to travel to Freeto	own for prepping.	
Category: TRANSPORT		Receipt 🗹	
Amount: 135,000.00	SUS Dollars	Local Currency	
Approved By: PTRAINC	OR .		
43 Date: Made By: RDIACK Reason: communication	Monday, December 17, 2007	·	mote village
Category: INFORMATIO		Receipt 🗹	:
Amount: 30,000.00	1 SUS Dollars	•	
Approved By: RDIACK	<u> </u>	<u> </u>	: :
44 Date:	Thursday, January 03, 2008	Receipt No: 1199358170	
Made By: RDIACK			
Reason: communiccation witness.	for celphone as witness is in remo	ote village and required as firs	t session
Category: INFORMATIO	N :	Receipt 🗹	
Amount: 30,000.00	🗆 SUS Dollars	☑ Local Currency	
Approved By: RDIACK		: 1	

Page 11 of 12



Total Disbursements	\$US Dollars	Local Currency	Totals	No. of Payments
	[1]	\mathbf{Z}	2,615,025.00	41
	ΞI		0.00	3



4

Special Court for Sierra Leone All Disbursements for Witness

SCSLP0652 TF1-366

1	Date:	Tuesday, Augi	ıst 24, 2004	Receipt No: 1095695	399
Made By	: MCORDWELL				
Reason	•	to facilitate the atten as funding for purch		ess at the Special Court gessential.	for Investigation
Category:	CLOTHING			Receipt 🗹	
Amount:	125,000.00		\$US Dollars	Local Currency	у
Approved I	By: RLAPIER	RE ·			
-		Wednesday, Auguon facilitate the attendars funding for Accom	lance of Witne	ess at the Special Court for	
Category:	ACCOMODATI	ON		Receipt 🗹	
	120,000.00		SUS Dollars	Local Currency	:
Approved B	y: RLAPIERR	E			
		- :			
3	Date:	Wednesday, Augus	t 25, 2004	Receipt No: -12929646	72
Made By:	MCORDWELL	::			1
		facilitate the attenda funding for food for		s at the Special Court for	r Investigation
Category:	FOOD			Receipt 🗹	· ·
Amount: 8	80,000.00	□ s	US Dollars	☑ Local Currency	
Approved By	: RLAPIERRI	3	<u>:</u>	1. 1.1	
Reason: F		Saturday, August acilitate the attendar unding for Accomod	nce ofWitness	Receipt No: -106651410 at the Special Court for the nights.	
Category: A	CCOMODATIO	N		Receipt 🗹	
Amount: 12	20,000.00	□ \$U	S Dollars	☑ Local Currency	
Approved By:	RLAPIERRE				



8

Date:	l uesday, Augi	ust 31, 2004	Receipt No: -5364/005/	
Made By: MCORDWELL				
	o facilitate the atten s funding for Trans		ess at the Special Court for s	Investigation
Category: TRANSPORT/N	IEALS		Receipt 🗹	
Amount: 30,000.00		\$US Dollars	✓ Local Currency	
Approved By: RLAPIERE	E			
6 Date:	Wednesday, Sep	tember 01, 2004	Receipt No: 1654810828	
Made By: MCORDWELL				
Reason: Funds required to process as well as	facilitate the attend funding forTransp	fance of Witne ortation from I	ess at the Special Court for I Kono to Kailahun and meal	nvestigations.
Category: TRANSPORT/M	EALS		Receipt 🗹	
Amount: 100,000.00		\$US Dollars	✓ Local Currency	
Approved By: RLAPIERR	3 ; ;	:	: ;;	: :
7 Date:	Friday, Novembe	r 05, 2004	Receipt No: -200156622	
Made By: YDAFAE				
Reason: Payment to Kingto	m Guest House for	Witness for T	Three Nights	
Category: ACCOMODATIO	N ::		Receipt 🗹	: :
Amount: 120,000.00	□ s	SUS Dollars	✓ Local Currency	
Approved By: ACOMEAU	**			
Date: Made By: ACOMEAU			eccipt No: 718231025	:
Reason: Payment to Witnes		outes for time	Receipt 🗹	
Category: FOOD/TOILETRIN		110 D . II		
Amount: 60,000.00	11 \$ (JS Dollars	M Local Currency	
Approved By: MFLOYD				



9	Date:	Monday	, November 08, 20	04 Reco	eipt No: 1	110795620	
Made By: Y	DAFAE						
Reason: Pa	yment to King	tom Guest	House for Witnes	s for One l	Night		
Category: A	CCOMODAT	ON			Recei	pt 🗹	
Arnount: 40	,000.00		SUS Dol	lars 5	/ Local C	urrency	
Approved By:	ACOMEA	J					
10	Date:	Tuesday,	November 09, 200)4 Rece	ipt No: 17	755501488	
Made By: YI			II f	for True	Viahta		
_	_		House for Witness	ior iwe i			
Category: AC	: *	NC		·	Receip	: :	
Amount: 80,	000.00		SUS Doll	ars 🛂	Local C	urrency	
Approved By:	ACOMEAL	Ţ				<u> </u>	
	; ‡ ; ‡		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		i i	: :	:
11	Date:	hursday, l	November 11, 2004	4 Recei	pt No: 610	621963	
Made By: YD.	AFAE						
Reason: Payr	ment to Kingto	om Guest I	House for Witness	for Four N	lights		
Category: ACC	COMODATIC	N	÷ 11		Receipt		
Amount: 160,	000.00		☐ \$US Dolla	irs 🖸	Local Cu	rrency	
Approved By:	ACOMEAU			•		r +	
12		Friday, N	ovember 12, 2004	Receip	t No: 142	4531806	
Made By: YDA		- C T 4	For Course James (7)				
•		s ior rood	for Seven days (7)		•		
Category: FOO	D		_		Receipt		
Amount: 70,00	0.00		☐ \$US Dollar	·s 🔽 1	Local Cur	rency	
Approved By:	ACOMEAU						



13	Date:	Tuesday, N	ovember 16, 2004	Receipt No: -2789986	49
Made By: YD	DAFAE				
Reason: Pay	ment to Witr	ess for Food	, Snacks and Drinks	3.	
Category: FO	OD/DRINKS	S/SNACKS		Receipt 🗹	
Arnount: 50,	00.00		SUS Dollar	s 🗹 Local Currency	•
Approved By:	ACOMEA	ប			
14	Date:	Tuesday, No	ovember 16, 2004	Receipt No: -18467953	330
Made By: PSA Reason: Pay		ess for Meals			
Category: ME				Receipt 🗹	
Amount: 20,0	00.00		☐ \$US Dollars	✓ Local Currency	
Approved By:	ACOMEAU	J			
	1 .		: : :	: :	· - 4 · 4
15	.			D	· ;
13	Date:	weanesaay	y, November 17, 2004	Receipt No: -201123522	23
Made By: PSA	NNOH				
Reason: Payri	nent to Witne	ss for Family	attendance		
Category: FAM	IILY ATTEN	DANCE	· · · · · · · · · · · · · · · · · · ·	Receipt 🗹	* *
Amount: 150,0	00.00		☐ \$US Dollars	Local Currency	
Approved By:	ACOMEAU				
16	Date: T	hursday, Nov	rember 18, 2004	Receipt No: 452388892	
Made By: PSAN	NOH				
Reason: Paym	ent to Witnes	s for Meals			
Category: MEA	LS			Receipt 🗹	
Amount: 10,000	0.00		SUS Dollars	☑ Local Currency	
Approved By:	ACOMEAU				



17	Date:	Friday, November 19, 2004	Receipt No: 217052397
Made By: PSAN	NOH		•
Reason: Paymen	nt to Witne	ess for Meals	
Category: MEAL	S		Receipt 🗹
Amount: 20,000.00		SUS Dollars	☑ Local Currency
Approved By: A	COMEAU		
18	Date:	Monday, November 22, 2004 I	Receipt No: 24816277
Made By: YDAFA	E.		
Reason: Payment	to Kingto	m Guest House for Witness for T	wo Nights
Category: ACCOM	ODATIO	N	Receipt 🗹
Amount: 80,000.0	0	SUS Dollars	☑ Local Currency
Approved By: AC	OMEAU		



SPECIAL COURT FOR SIERRA LEONE JOMO KENYATTA ROAD • FREETOWN • SIERRA LEONE PHONE: +39 0831 257000 or +232 22 297000 or +39 083125 (+Ext) UN Intermission 178 7000 or 178 (+Ext) FAX: +232 22 297001 or UN Intermission: 178 7001

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- Sesay, Kallon & Gbao

Case Number: SCSL-2004-15-T Document Index Number: 1161 Document Date 30 May, 2008

Filing Date 30 May, 2008 at 15:58 Number of confidential pages: 4

Page Number: 26929-26932

\mathcal{D}_{0}	ocument Type:
	Affidavit
	Indictment
	Motion
	Order
	Other
	Decision
	Response
	Application

Document Title Motion to Request the Trial Chamber to Hear Evidence

Concerning the Prosecution's Witness Management Unit

And Its payment to Witnesses

Name of Officer

Elaine Bola Clarkson
Signed:

Annex E – Letter from Mr. Jordash to Mr. Harrison, dated 1st December 2007 and reply from Mr. Rapp, dated 18th December 2007



SPECIAL COURT FOR SIERRA LEONE JOMO KENYATTA ROAD • FREETOWN • SIERRA LEONE SESAY DEFENCE TEAM

Telephone: +232 22 297214 · Email: defence-sesay@un.org

1st December 2007

Dear Mr. Harrison,

As you will appreciate we are half way through the Sesay defence case and would wish to seek clarification on a number of trial related issues concerning the operation of the WMU and its role within the court. We have become aware through an advertisement on the SCSL website that it has a number of functions, inter alia:

• Directing and supervising of the financial control of all payments made to or for a witness by the Office Of the Prosecutor

We have also become aware that its functions are independent of the WVS which we understand is the only institution in the court statutorily mandated pursuant to Article 16 of the Statute of the Special Court to provide "assistance" for witnesses by way of protective measures and security arrangements. We note howeve: that Rule 39(ii) of the Rules states that the Prosecutor may take all "measures deemed necessary for the purpose of the investigation, including the taking of any special measures to provide for the safety, the support, and the assistance of potential witnesses and sources". We therefore seek clarification concerning the role played by the WMU and the assistance it has provided to the Prosecution witnesses in the RUF case.

We would request any answers you are able to provide concerning the following:

- (i) Who does the Chief of WMU report to?
- (ii) The role played by the WMU in providing assistance to witnesses or potential witnesses, namely what types of assistance it provides to witnesses (whether monies, relocation, housing, educational programs, health care, top up cards, meals, day trips, social activities, leisure facilities (e.g. televisions, home furnishings) release from imprisonment, help with immigration issues or criminal charge or civil penalty and any other material, leisure or service facility);
- (iii) The specific assistance it has provided in relation to all the RUF witnesses and the reasons for that assistance;
- (iv) Proof of the assistance, whether receipts or other records, indicating the assistance and the reasons for it;
- (v) The criteria used by WMU to determine the assistance required and the manner in which the criteria departs from that employed by the WVS; including whether the

- WVS has any input or veto on the WMU assistance provided to the RUF witnesses and the exact relationship between the WMU and the WVS;
- (vi) A detailed breakdown of the budget of the WMU and the source of the budget
- (vii) Who or which aspect of the SCSL has oversight of the WMU accounts and
- (viii) A detailed breakdown of the amount of money which has been spent providing assistance to RUF prosecution witnesses, both prior to, during and after testimony.

We await any clarification you are able to provide. Given the potential importance of the issue in terms of the WMU's impact upon the trial process we would appreciate an individual response to each enquiry.

Regards,

Wayne Jordash Lead Counsel, Sesay Defence team



SPECIAL COURT FOR SIERRA LEONE OFFICE OF THE PROSECUTOR

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18 December 2007

<u>Transmitted by email to sdefence-sesay@scsl</u> and w.jordash@doughtystreet.co.uk

Mr. Wayne Jordash Lead Counsel Sesay Defence team Special Court for Sierra Leone Freetown, Sierra Leone

Dear Mr. Jordash,

I am in receipt of your letter dated 1st December 2007 addressed to Mr. Peter Harrison, the Senior Trial Attorney in the RUF case, where you have made inquires regarding the Office of the Prosecutor's Witness Management Unit (WMU).

The WMU is within the Office of the Prosecutor and under my overall supervision. It is the unit established to fulfill the responsibility of the Prosecutor under Rule 39(ii) of the Rules of Procedure and Evidence, for "...the taking of any special measures to provide for the safety, the support and assistance of potential witnesses and sources."

As with all components of the Office of the Prosecutor, information about internal procedures is privileged under Rule 70(A) of the Rules of Procedure and Evidence. Of course, we acknowledge that information about payments made by the WMU for support of witnesses is evidence that "may affect the credibility of prosecution evidence" under Rule 68(B), of the Rules of Procedure and Evidence. This information has been and will be disclosed to the Defence.

Best regards.

Sincerely,

Stephen Rap

Prosecutor