

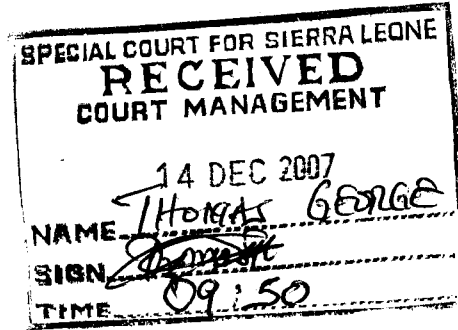
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SCSL-04-15-T  
(32531 - 32547)

SPECIAL COURT FOR SIERRA LEONE  
TRIAL CHAMBER I

32531

**Before:** Hon. Justice, Benjamin Mutanga Itoe, Presiding  
Hon. Justice Bankole Thompson  
Hon. Justice Pierre Boutet  
**Registrar:** Mr. Herman Von Hebel  
**Date filed:** 11 December 2007



**THE PROSECUTOR**

against

ISSA HASSAN SESAY  
MORRIS KALLON  
AUGUSTINE GBAO

Case No. SCSL -2004-15-T

**PUBLIC**

**KALLON REQUEST FOR LEAVE TO VARY WITNESS LIST AND FOR  
PROTECTIVE MEASURES AND ANNEX A**

**Office of the Prosecutor:**

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## INTRODUCTION

1. The Kallon Defence proposes to add five witnesses that have all been discovered in recent investigations, and to withdraw twenty witnesses from the Kallon “core witness list,” for a net reduction of fifteen witnesses. This variation of the witness list will streamline the process, and shorten the presentation of the Defence for Kallon.
2. The proposed additional witnesses, who are discussed individually *infra*, are: DMK 159, DMK 160, DMK 161, DMK 162, and DMK 163.
3. The Kallon Defence proposes that the following witnesses be withdrawn from the list: DMK 024, DMK 143, DMK 151, DMK 158, DMK 008, DMK 155, DMK 059, DMK 020, DMK 028, DMK 031, DMK 033, DMK 019, DMK 043, DMK 149, DMK 097, DMK 110, DMK 103.

## PROCEDURAL HISTORY

4. On the 30 October 2006, the Chamber ordered each of the Defence Teams to file the following materials, (“the Defence Materials”) by 16 February 2007:<sup>1</sup>
  - a. a “core” and “back-up” witness list;
  - b. an indication of common witnesses;
  - c. an indication as to whether or not the accused person will testify;
  - d. a list of expert witnesses;
  - e. a list of exhibits expected to be tendered;
  - f. a chart indicating the documentary and testimonial evidence upon which the Defence will rely to defend the Accused against the allegations contained in each paragraph in the indictment.

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<sup>1</sup> *P v Sesay et al.*, SCSL-04-15-T, Scheduling Order Concerning the Preparation and Commencement of the Defence Case, 30 Oct. 06, see para 1.

5. On 18 January 2007, the “Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non-Public Disclosure” was filed.<sup>2</sup> The motion was granted on 19 March 2007.<sup>3</sup>
6. On 28 January 2007, the Kallon Defence team filed an application for an extension of time for the filing of the Defence Materials.<sup>4</sup> The Chamber granted the application on 7 February 2007 and, in so doing, ordered that the filing of the Defence Materials should be done not later than 5 March 2007.<sup>5</sup> On 5 March 2007, the Kallon Defence filed the Defence Materials.<sup>6</sup>
7. On 28 March 2007, the Chamber made the following orders, *inter alia*:
  - a. that the Defence teams “review their respective [m]aterials, with a view to reducing their current witness lists”;<sup>7</sup>
  - b. that “any reviewed and reduced witness list” by each of the Defence teams should be filed not later than 16 April 07;<sup>8</sup> and
  - c. that such the Defence teams should provide “detailed” witness summaries.<sup>9</sup>
8. On 16 April 2007, the “Kallon Defence Filing in Compliance with Consequential Orders Concerning the Preparation and Commencement of the Defence Case” was filed in compliance with the orders of 28 March 2007.<sup>10</sup>

<sup>2</sup> *P v Sesay et al.*, SCSL-04-15-T, Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non-Public Disclosure, 18 Jan. 07.

<sup>3</sup> *P v Sesay et al.*, SCSL-04-15-T, Decision on Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non Public Disclosure, 19 March 07.

<sup>4</sup> *P v Sesay et al.*, SCSL-04-15-T, Kallon Defence Application to Vary the 16 February 2007 Filing Date, 28 Jan. 07.

<sup>5</sup> *P v Sesay et al.*, SCSL-04-15-T, Decision and Order on Defence Applications for an Adjournment of 16<sup>th</sup> February Deadline for Filing Defence Material, 7 Feb. 07.

<sup>6</sup> *P v Sesay et al.*, SCSL-04-15-T, Confidential Kallon Defence Filing in Compliance with Scheduling Order Concerning the Preparation and Commencement of the Defence case, 5 March 07.

<sup>7</sup> *P v Sesay et al.*, SCSL-04-15-T, Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 28 March 07, see para 1.

<sup>8</sup> *P v Sesay et al.*, SCSL-04-15-T, Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 28 March 07, see para 2.

<sup>9</sup> *P v Sesay et al.*, SCSL-04-15-T, Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 28 March 07, see para 3 and 4.

<sup>10</sup> *P v Sesay et al.*, SCSL-04-15-T, Public Kallon Defence Filing in Compliance with Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 16 April 07.

## I. PROPOSED WITNESSES

### The Law

9. The standard for the addition of witnesses is enshrined in Rule 73ter (E), which states:

"After commencement of the Defence case, the Defence, if it considers it to be in the interests of justice, may move the Trial Chamber for leave to reinstate the list of witnesses or to vary its decision as to which witnesses are to be called".

10. On the subject of additional witnesses, the jurisprudence has established the key principles to be taken into consideration. Firstly, such application should be considered in the interests of justice.<sup>11</sup> Secondly, there must be good cause for the application, in other words there must be a credible reason for not varying the witness list at an earlier stage of the proceedings.<sup>12</sup>

11. An analysis of the jurisprudence reveals that, in making a determination as to whether the interests of justice will be served and good cause has been shown in respect of the addition of witnesses to the witness list, the Chamber may consider the following, *inter alia*:

- a. the Paramount importance of hearing the best possible evidence, albeit lately-discovered;
- b. the potential prejudice to the Defence caused by denying such an application;
- c. the materiality of the testimony;
- d. the exercise of due diligence in trying to discover the witness at an earlier stage;
- e. the timing of the application and whether the late amendment to the witness list would cause prejudice to any of the parties;

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<sup>11</sup> *P v. Norman et al.*, SCSL-04-14-T, Decision on Prosecution Request for Leave to Call Additional Witnesses, 29 July 04, at para 25; *P v. Sesay et al.*, SCSL-04-15-T-320, Decision on Prosecution Request for Leave to Call Additional Witnesses and Disclose Additional Witness Statements, 11 Feb. 05, at para 25.

<sup>12</sup> *P v. Sesay et al.*, SCSL-2004-15-T. Decision on Prosecution Request for Leave to Call Additional Witnesses and Disclose Additional Witness Statements, 11 Feb. 05, at para 25.

f. the complexity of the case.

12. Denying an application for the addition of material Defence witnesses would be a violation of the applicant's right to make full answer to the Prosecution case and would be contrary to the interests of justice, as indicated by *Delalic* in the following terms:

"The Trial Chamber is enjoined to utilize all its powers to facilitate the truth finding process in the impartial adjudication of the matter between the parties. It is thus important to adopt a flexible approach when considering the management of witnesses. Where the testimony of a witness is important to the Prosecution or the Defence, the Trial Chamber will ensure that such witness is heard, subject, naturally, to the limits prescribed in the Statute of the International Tribunal ("the Statute") and Rules."<sup>13</sup>

13. In *Nahimana et al.*, the Trial Chamber of the International Criminal Tribunal for Rwanda ("the ICTR") held that considerations such as "materiality of the testimony, the complexity of the case, prejudice to the Defence, including elements of surprise, ongoing investigations, replacement and corroboration of evidence" were material factors in satisfying the requirements of the "interests of justice" and of "good cause."<sup>14</sup>

14. In addition, in response to a second request from the Prosecution for leave to amend its list of witnesses the Chamber held stated that:

"... As long as a witness of the nature of X is available and capable of giving relevant direct testimony on crucial allegations, the Chamber

<sup>13</sup> *P v. Delalic*, IT-96-21-T, Decision on Confidential Motion to Seek Leave to Call Additional Witnesses, 4 Sept. 97, para 7.

<sup>14</sup> *P v. Nahimana et al.*, ICTR-99-52-I, Decision on the Prosecutor's Oral Motion for Leave to Amend the List of Selected Witnesses, 26 June 01, see para 19 and 20; see also *P v. Nahimana et al.*, ICTR-99-52-I, Decision on Prosecutor's Application to Add Witness X to the List of Prosecution Witnesses and for Protective Measures, 14 Sept. 01; *P v. Delalic*, IT-96-21-T, Decision on Confidential Motion to Seek Leave to Call Additional Witnesses, 4 Sept. 97, at para 10; *P v. Norman et al.*, SCSL-04-14-T, Decision on Prosecution Request for Leave to Call Additional Witnesses, 29 July 04, at para 16.

should not exclude such testimony”<sup>15</sup> [Emphasis added.]

15. This Chamber has held that in granting an application for the addition of witnesses, it is material that the evidence could not have been discovered or made available earlier, notwithstanding the exercise of due diligence.<sup>16</sup>

### Submissions

16. As regards the complexity of the case and the preparation of the Defence and its ongoing investigations, the Defence notes the lack of pre-trial notice provided by the indictment and pre-trial briefs in this case. Defence investigations are necessarily responsive to Prosecution allegations. To a large extent in this case, these allegations have only emerged during the Prosecution case, in the absence of a detailed indictment. This has created a situation of considerable complexity for the Defence in its investigations. According to the jurisprudence cited above, this should be considered by the Chamber in its assessment of the merits of this application.

17. As regards the timing of this application and potential prejudice to the parties, the Defence notes that it is being made at least four months before the proposed witnesses would testify, thereby giving the Prosecution and other parties ample time for investigation. Therefore, no prejudice can be said to result from such a timely application.

18. The proposed witnesses will provide testimony that would have been elicited from several of the witnesses who are being dropped. This will serve to expedite the trial in furtherance of judicial economy.

19. Annexed to this application are the summaries of the proposed witnesses for the

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<sup>15</sup> *P v. Nahimana et al.*, ICTR-99-52-I, Decision on Prosecutor’s Application to Add Witness X to the List of Prosecution Witnesses and for Protective Measures, 14 Sept. 01, at para 13.

<sup>16</sup> *P v. Sesay et al.*, SCSL-2004-15-T. Decision on Prosecution Request for Leave to Call Additional Witnesses and Disclose Additional Witness Statements, 11 Feb. 05, para 35.

Chamber's inspection, with reference to which it is hoped that the Chamber will be able to satisfy itself as to the materiality of the testimony that they will give.

20. It is submitted that in respect of each one of the proposed witnesses the Defence exercised due diligence in its investigations but, that notwithstanding, their inclusion in the witness has not been possible until now.
21. **DMK 159** is a proposed international witness who was attached to UNAMSIL at times relevant to the indictment. Considering that the Kallon Defence established contact with this witness last year, but that it was not until June this year that he accepted to meet the Kallon Defence team, it is submitted that, despite the exercise of due diligence, this witness could not have been included earlier in the witness list.
22. **DMK 159** was stationed at the Makeni-Magburaka axis. He would testify to Mr. Kallon's support of UNAMSIL during the disarmament process and how Mr. Kallon was almost killed by RUF combatants following allegations of his support for UNAMSIL. **DMK 159** would also give evidence that Mr. Kallon provided care for civilians during this period. Furthermore, **DMK 159** would provide important evidence on the command structure in the Makeni-Magburaka axis at that time. Therefore, it is submitted that **DMK 159** would provide material evidence to the trial.
23. No other witness currently on the list is in a position to give this testimony and details provided by **DMK 159**
24. **DMK 160** was a Kamajor, fighting with the CDF and based in Gerihun at times relevant to the indictment. Contact with this witness was established only in September this year. Despite the endeavours of the Kallon Defence team, this witness only agreed to testify two weeks ago. Therefore, it is submitted that despite the exercise of due diligence, the inclusion of this witness on any witness list has not been possible until now.

25. DMK 160 was a Kamajor based in Gerihun. He would give important testimony refuting the allegation of the involvement of the 2<sup>nd</sup> accused in the killing of the Paramount Chief in Gerihun in BO.
26. Witness DMK 160 will adduce evidence and provide details which no other witness currently on the list has.
27. **DMK 161, DMK 162 and DMK 163** were discovered during interviews with other witnesses. Despite several unsuccessful attempts to locate these proposed witnesses the investigations team was only able to locate them and take their statements during its most recent mission to the Provinces, in November 2007.
28. DMK 161 was a commander within the RUF during a period of time relevant to the indictment. As such, the witness would be in a unique position to testify on specific allegations made by Prosecution witnesses. He would give evidence that the abduction of UNAMSIL personnel was carried out on the order of Foday Sankoh and Superman, effected by, *inter alia*, Komba Gbundema and that the accused Kallon was not involved. He would also give evidence that the accused Kallon was not involved in mining in Kono and that he did not order the burning of Koidu Town. No other witness currently on the list is capable of providing the details to be given by DMK 161.
29. DMK 162 would give evidence that Mr. Kallon was not in Tumbodu during the period when Prosecution witnesses allege that fifteen people were killed in a mining pit. The witness will further give evidence to refute Prosecution allegations regarding the killing of a pregnant woman in Kono and the alleged involvement of the 2<sup>nd</sup> accused. No other witness currently on the list will give evidence and details on this aspect of the defence case
30. DMK 163 was a RUF radio operator and would contradict Prosecution witnesses TF1 361 and TF1 360 to the extent that they were not radio operators for Superman and



that Mr. Kallon did not have a radio set in Koidu. He will also give testimony that, at the relevant time, Mr. Kallon was in Bo and was not involved in the killing of the Paramount Chief in Gerihun. This is the only defence witness to provide details regarding radio operations within the RUF and to refute allegations of the prosecution in many respects concerning the role of the accused person.

## II. PROTECTIVE MEASURES

31. The Kallon Defence requests that the pre-existing protective measures granted to witnesses in the “core” witness list<sup>17</sup> be applied to the proposed additional witnesses.
32. The Defence submits that as the presentation of the Defence case of Mr. Kallon is not likely to start before the middle or end of March 2008, the disclosure of the identity and location of the witnesses and the potential for fear being generated from investigation by the Prosecution or other Defence teams places the witnesses and the Kallon Defence case in unnecessary jeopardy.
33. It is submitted that if the identities of these witnesses are revealed at this point in time they could refuse to testify, which would prejudice the right of the accused to fully respond to the Prosecution case and would deprive the Chamber of the opportunity of enlightenment as to Prosecution allegations, which their material testimony would provide.

## CONCLUSION

34. The proposed new witnesses are necessary to make full answer and Defence for the accused, Mr. Kallon. Their evidence is relevant and probative. They replace a far larger number of witnesses that would be removed, thus shortening and streamlining the Defence. They are all witnesses who have only recently been discovered by the

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<sup>17</sup> *P v Sesay et al.*, SCSL-04-15-T, Decision on Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non Public Disclosure, 19 March 07, at para 34.

Kallon Defence Team, and thus could not have been included in the earlier witness lists. The information about them is being communicated now, at least 4 months before they would testify, and probably somewhat longer, thus causing no undue prejudice to the Prosecution, which will have ample time for investigations. Moreover, the Kallon Defence is yet to commence presenting its witnesses and is unlikely to do so before the middle or end of March 2008.

35. It is manifestly in the interest of justice that the Chamber permit the Kallon Defence to vary its witness list as requested.

### PRAYER


36. In light of the foregoing, the Chamber is prayed to:


- a. **PERMIT** the variation of the Kallon Defence witness list, by adding the following witnesses: DMK159, DMK 160, DMK 161, DMK 162, DMK 163; and
- b. **PERMIT** the variation of the Kallon Defence witness list, by removing the following witnesses: DMK 024, DMK 143, DMK 151, DMK 158, DMK 008, DMK 155, DMK 059, DMK 020, DMK 028, DMK 031, DMK 033, DMK 019, DMK 043, DMK 149, DMK 125, DMK 110, DMK 103; and, to the extent that prayer (a) is granted,
- c. **ORDER** the existing protective measures in respect of the Kallon Defence witnesses to apply to the proposed witnesses.

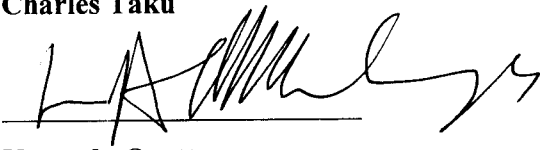
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DONE in Freetown on this...14<sup>th</sup>... day of...December, 2007.

For Defendant **KALLON**,

ff   
**Shekou Touray**

ff   
**Charles Taku**

ff   
**Kennedy Ogetto**

  
**Lansana Dumbuya**

## LIST OF AUTHORITIES

### A. International Conventions

1. Rules of Procedure and Evidence of the Special Court for Sierra Leone

### B. Decisions and Judgments

- (i) *Special Court for Sierra Leone:*
2. *P v Sesay et al.*, SCSL-04-15-T, Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 28 March 07.
3. *P v Sesay et al.*, SCSL-04-15-T, Decision on Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non Public Disclosure, 19 March 07.
4. *P v Sesay et al.*, SCSL-04-15-T, Decision and Order on Defence Applications for an Adjournment of 16<sup>th</sup> February Deadline for Filing Defence Material, 7 Feb. 07.
5. *P v Sesay et al.*, SCSL-04-15-T, Scheduling Order Concerning the Preparation and Commencement of the Defence Case, 30 Oct. 06.
6. *P v. Sesay et al.*, SCSL-04-15-T-320, Decision on Prosecution Request for Leave to Call Additional Witnesses and Disclose Additional Witness Statements, 11 Feb. 05.

7. *P v. Norman et al.*, SCSL-04-14-T, Decision on Prosecution Request for Leave to Call Additional Witnesses, 29 July 04.

(ii) *International Criminal Tribunal for the Former Yugoslavia:*

8. *P v. Delalic*, IT-96-21-T, Decision on Confidential Motion to Seek Leave to Call Additional Witnesses, 4 Sept. 97.

(iii) *International Criminal Tribunal for Rwanda:*

9. *P v. Nahimana et al.*, ICTR-99-52-I, Decision on the Prosecutor's Oral Motion for Leave to Amend the List of Selected Witnesses, 26 June 01.
10. *P v. Nahimana et al.*, ICTR-99-52-I, Decision on Prosecutor's Application to Add Witness X to the List of Prosecution Witnesses and for Protective Measures, 14 Sept. 01.

**C. Motions**

11. *P v Sesay et al.*, SCSL-04-15-T, Public Kallon Defence Filing in Compliance with Consequential Orders Concerning the Preparation and Commencement of the Defence Case, 16 April 07.
12. *P v Sesay et al.*, SCSL-04-15-T, Confidential Kallon Defence Filing in Compliance with Scheduling Order Concerning the Preparation and Commencement of the Defence Case, 5 March 07.

13. *P v Sesay et al.*, SCSL-04-15-T, Kallon Defence Application to Vary the 16 February 2007 Filing Date, 28 Jan. 07.

14. *P v Sesay et al.*, SCSL-04-15-T, Kallon Defence Motion for Immediate Protective Measures for Witnesses and Victims and for Non-Public Disclosure, 18 Jan. 07.

## PUBLIC

### ANNEX A

#### Summaries of expected testimonies of proposed witnesses

#### **DMK 159**

The witness will testify on events that occurred in Rogbere, Lunsar, and Makeni concerning the conduct of the Accused in relation to civilians and UNAMSIL.  
He will testify on the RUF command structure.

He will testify that the RUF, as a Guerrilla Movement, had a command structure different from that of a conventional army.

The witness will testify about RUF commanders in the Lunsar, Makeni, and Magboroka such as Kailondo, and Bugeme Kallon.

He will testify that Morris Kallon had a very cordial and warm relationship with UNAMSIL and played a great role in achieving lasting Peace which included his cooperation with UNAMSIL and facilitation of the disarmament process.

The witness will testify that Morris Kallon was a disciplinarian, enforcing strict discipline within the RUF Guerrilla movement without fear or favour and that this was one of the reasons why he was unpopular with offenders.

The witness will testify that all weapons were collected from RUF combatants when

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UNAMSIL established full presence in Lunsar, Makeni, Masingbe and Magboroka.

The witness will testify that Mr. Kallon faced severe difficulties during the period of the peace process and that he was eventually moved from Magburaka to Port Loko to receive the protection of the UN.

The witness will testify that Mr. Kallon contributed to the peace process by allowing UNAMSIL to deploy in RUF controlled areas and encouraged combatants to disarm.

#### **DMK 160**

The witness will testify that he saw SLA/AFRC soldiers attack Gerihun sometime in 1997.

The witness will testify that these soldiers burnt down many houses and killed civilians including a woman called Sokkay and her uncle, Pa. Karim.

The witness will testify that he was told that the soldiers led by Lieutenant Koyateh identified themselves as SLAs and that they had killed the Paramount Chief Demby.

The witness will testify that subsequently, the SLA soldiers were shouting that no one was going to bury the Chief's corpse.

The witness will testify that he received information that before Chief Demby's family collected the corpse they had to ask for clearance from the SLAs in Bo.

The witness will testify that Morris Kallon was not present and was not in Gerihun at the time. The witness will further state that at the time the Paramount Chief was killed, only SLA/AFRC soldiers were in BO.

#### **DMK 161**

The witness will testify that, at Zogoda: Mohamed Tarawallie was the overall commander of the RUF; that Mosquito was to be the Deputy but Tarawallie promoted Superman from Major to Lieutenant Colonel which was the same rank as Mosquito; that as a matter of general practice Tarawallie passed commands to Superman who would then pass orders to Mosquito; and that Kallon did not feature in this command structure.

The witness will testify that Sankoh never gave Kallon any position of responsibility such as Battalion Commander or Deputy Area Commander

The witness will testify that Mosquito had a bodyguard in Tongo in 1997 called Kallon who

was his main bodyguard.

The witness will testify that after the ECOMOG intervention in Freetown, Superman went through Magburaka and attacked Kono and that by the time the witness arrived in Kono Superman had taken over Kono and was the commander on the ground. Morris Kallon was never in command of any units in Kono.

The witness will testify that Superman was overall commander of the RUF in Kono and that Rambo was his deputy. Furthermore, the witness will testify that a plot was made to send Mr. Kallon to Gandohun because they said he had ill luck not conducive for the War.

The witness will testify that Mr. Kallon was not involved in the bank robbery in Kono.

The witness will testify that Savage was in charge of Tumbodu and that he heard that he committed a lot of atrocities there.

The witness will testify that it was Superman who had authority over combatants in Kono and that this was the reason Mosquito ordered him, and not Mr. Kallon, to remove Savage from Tumbodu.

The witness will testify that he never heard that Mr. Kallon killed people at 5-5 spot

The witness will testify that the accused Kallon was not involved in the burning of Koidu.

The witness will testify that the mining commanders in Kono until February 1998 were Mohammed Kamara and Komba and thereafter one CO Kennedy and that Mr. Kallon was not involved in mining in KONO

The witness will testify that the order to arrest the UNAMSIL came directly from Sankoh to Superman who gave instructions to Komba Gundema and Tall Bai Bureh from Kamakwie to carry out the order.

## **DMK-162**

The witness will testify that Savage was in charge of Tumbodu when the RUF/AFRC was in Kono and that he was perpetrating atrocities there.

The witness will testify that Mr. Kallon was not in Tumbodu at the time of these killings but that in fact he was in Koidu.

The witness will testify that Mr. Kallon was never the Commander at Tombudu nor did he ever go there.

The witness will testify that Mr. Kallon had no authority over Savage or any of the soldiers in Kono.



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**DMK 163**

He will testify that in 1996 at Bo Jungle Captain Augustine Kargbo was the Commander and deputized by CO Rambo.

He will testify that when they retreated from Bo Jungle to Kangari Hills in August 1996, Colonel Isaac Mongor was the commander at Kangari hills. His deputy was CO George. He will testify that Morris Kallon was not deputy to Col. Isaac Mongor at Kangari Hills.

He will testify that throughout the war, TF1-361 was not a radio operator for Superman.

He will also testify that TF1 360 was not a radio operator to Superman in Kono in 1998.

He will testify that Morris Kallon went to Bo in August 1997. He remained there until the retreat to Kono.

He will testify that between 14 February and December of 1998, Morris Kallon was not deputy to Superman in Kono and that Morris Kallon never had a radio set there because he did not hold a position of responsibility.

He will testify that Morris Kallon only had a radio from April 1999 when he was in Magburaka.

He will testify that he did not see child soldiers with Morris Kallon as bodyguards.

He will testify that the laws of the RUF prohibited raping, looting, burning of houses and killing of civilians.