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SCSL-03-01-T
(30796-30839)

30796

THE SPECIAL COURT FOR SIERRA LEONE

Trial Chamber II

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

Registrar: Ms. Binta Mansaray

Date: 27 October 2010

Case No.: SCSL-03-01-T

SPECIAL COURT FOR SIERRA LEONE
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THE PROSECUTOR

–v–

CHARLES GHANKAY TAYLOR

PUBLIC WITH CONFIDENTIAL ANNEXES A-D

DEFENCE MOTION FOR ADMISSION OF DOCUMENTS AND DRAWING OF AN ADVERSE INFERENCE RELATING TO THE ALLEGED DEATH OF JOHNNY PAUL KOROMA

Office of the Prosecutor:
Ms. Brenda J. Hollis

Counsel for Charles G. Taylor:
Mr. Courtenay Griffiths, Q.C.
Mr. Terry Munyard
Mr. Morris Anyah
Mr. Silas Chekera
Mr. James Supuwood

I. INTRODUCTION AND BACKGROUND

1. On 20 October 2010, the Trial Chamber, deciding on a Defence Motion for the disclosure of exculpatory information relating to DCT-032, found that the Prosecution had violated its Rule 68(B) obligations and ordered the Prosecution to disclose forthwith exculpatory material relating to Witness DCT-032, as well as information relating to the alleged death of Johnny Paul Koroma ("JPK") in Liberia.[1]
2. Specifically, the Trial Chamber ordered the Prosecution to disclose:
    a. The details and results of an investigation that was conducted by the Prosecution into the alleged death of Johnny Paul Koroma including DNA tests on corpses that were exhumed during that investigation;
    b. Records of all disbursements that were made to Defence witness DCT-032; and
    c. An original duplicate copy of the letter of indemnity against prosecution before the Special Court for Sierra Leone written by Stephen Rapp to Defence witness DCT-032.
3. The Trial Chamber however denied the Defence's request to draw adverse inferences from the Prosecution's failure to disclose the exculpatory materials beforehand. The Trial Chamber held that, at that stage, it was "pre-mature to consider whether it is appropriate for the Trial Chamber to 'draw adverse inferences' from the Prosecution's non-disclosure", since the "potentially exculpatory material [had] not yet been disclosed".[2]
4. On 21 October 2010, the Prosecution complied with the Court's order and disclosed the material, some of which is attached as Confidential Annexes A-C to this Motion. The affidavit of Witness DCT-032 which explains the Prosecution's misconduct with

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[1] *Prosecutor v. Taylor,* SCSL-03-01-T-1104, Decision on Public with Confidential Annexes A-D Defence Motion for Disclosure of Exculpatory Information Relating to DCT-032, 20 October 2010 ("**Decision**") (he procedural history is adequately laid out at paras. 1-16). See also *Prosecutor v. Taylor,* SCSL-03-01-T-1088, Defence Motion for Disclosure of Exculpatory Information Relating to DCT-032, 24 September 2010 ("**Original Motion**") and *Prosecutor v. Taylor,* SCSL-03-01-T-1096, Prosecution Response to Public with Confidential Annexes A-D Defence Motion for Disclosure of Exculpatory Information Relating to DCT-032, 1 October 2010.

[2] Decision, para. 33; as well as Separate Concurring Opinion of Justice Julia Sebutinde.

respect to him and the investigation into the alleged death of Johnny Paul Koroma in Liberia is attached as Confidential Annex D to this Motion.[3]

5. The Defence hereby requests that the recently disclosed exculpatory material in Confidential Annexes A-C, as well as the affidavit of DCT-032 in Confidential Annex D, be admitted pursuant to Rule 92*bis*, and/or that based on these materials, the Trial Chamber draws an adverse inference against Prosecution allegations[4] and evidence[5] that Charles Taylor, the Accused, was responsible in any way for the alleged death of Johnny Paul Koroma in Liberia.

6. The Defence appreciates that the Trial Chamber has previously ordered that all Defence filings be made no later than 24 September 2010.[6] However, in light of the fact that the exculpatory material sought to be tendered herein, which has been in the possession of the Prosecution since late 2008 was only disclosed to the Defence after the filing deadline imposed by the Trial Chamber, the Defence submits that it is in the interests of justice for the Trial Chamber to reconsider its previous deadline and adjudicate the present Motion.

II. APPLICABLE LEGAL PRINCIPLES

Reconsideration

7. While the Special Court Rules are silent on whether a Trial Chamber can reconsider its own previous decisions, the Appeals Chamber has held that a Chamber has an inherent jurisdiction to reconsider its own decisions to avoid injustice or miscarriage of justice.[7] Trial Chamber I adopted an ICTR Decision stating that the circumstances in which a Trial Chamber may reconsider a previous decision included instances where "new material circumstances have arisen since the decision".[8]

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[3] The same affidavit was attached as Confidential Annex A of the Original Motion.
[4] *Prosecutor v. Taylor,* SCSL-03-01-T, Prosecution Opening Statement, 4 June 2007, p. 276-280.
[5] Decision, para. 28. See also *Prosecutor v. Taylor,* SCSL-03-01-T, Trial Transcripts, **Testimony of Zig Zag Marzah,** 12 March 2008, p. 5935-5937; **Testimony of Moses Blah**, 15 May 2008, p. 9998-10000; and **Testimony of TF1-375**, 25 June 2008, p. 12751-12766.
[6] *Prosecutor v. Taylor,* SCSL-03-01-T, Status Conference Transcript, 13 September 2010, p. 48323.
[7] *Prosecutor v. Norman et al,* SCSL-04-14-A73, Decision on Prosecution Appeal Against the Trial Chamber's Decision of 2 August 2004 Refusing Leave to File an Interlocutory Appeal, 17 January 2005, para. 40.
[8] *Prosecutor v. Norman et al,* SCSL-04-14-T-507, Decision on Urgent Motion for Reconsideration of the Orders for Compliance with the Order Concerning the Preparation and Presentation of the Defence Case, para. 14 (but see generally paras. 10-16), citing *Prosecutor v. Renzaho,* ICTR-97-31-I, Decision on

*Rule 92*bis

8. The core requirements of Rule 92*bis* – that the information sought to be tendered in lieu of oral testimony must be relevant; that the information must not go to proof of the acts and conduct of the accused; and that the reliability of such information must be susceptible of confirmation – are well-established at this point in the trial. The Defence respectfully refers to the statement of law relating to Rule 92*bis* from the Trial Chamber's most recent Rule 92*bis* Decision on 5 October 2010.[9]
9. The Defence specifically notes that the Special Court has adopted into its jurisprudence the ICTY Appeals Chamber's statement of law interpreting "acts and conduct of the accused" for purposes of Rule 92*bis*.[10] However, the Defence cites with approval Justice Sebutinde's reasoning that this prohibition under Rule 92*bis* is not intended to preclude an accused from tendering into evidence exculpatory information, since the prohibition against the admission of information going to acts and conduct of the accused is:

> "**primarily to protect the fair trial rights of the accused** as guaranteed by Article 17 of the Statute, by ensuring that he has the opportunity to confront live testimony on matters pertaining directly to his guilt and to cross-examine witnesses against him, which opportunity he would not have if the incriminating evidence were to be admitted in a form other than oral testimony, such as statements or transcripts".[11]

10. Such an understanding of the safeguard contained in Rule 92*bis* is further supported by jurisprudence from Trial Chamber I, which stated that the *Accused* would be "unfairly prejudiced" if documents pertaining to their acts and conduct are admitted into evidence without giving the Defence the opportunity for cross-examination.[12] Jurisprudence from the Special Court and the ICTY demonstrates that the phrase

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Renzaho's Motion to Reconsider the Decision on Protective Measures for Victims and Witnesses to Crimes Alleged in the Indictment, 9 November 2005, paras. 20-21.

[9] *Prosecutor v. Taylor,* SCSL-03-01-T-1099, Decision on Public with Annex A Defence Motion for Admission of Documents Pursuant to Rule 92*bis* – Newspaper Article, 5 October 2010, p. 3-4 ("**Rule 92*bis* Newspaper Decision**").

[10] Rule 92*bis* Newspaper Decision, p. 3-4.

[11] *Prosecutor v. Taylor,* SCSL-03-01-T-1099, Decision on Public with Annex A Defence Motion for Admission of Documents Pursuant to Rule 92*bis* – Newspaper Article, Separate Dissenting Opinion of the Honorable Justice Julia Sebutinde, 5 October 2010, paras. 2-3 ("**Sebutinde Rule 92*bis* Dissent**") (emphasis added).

[12] Sebutinde Rule 92*bis* Dissent, para. 7, citing *Prosecutor v. Norman et al,* SCSL-04-14-T-447, Decision on Prosecution's Request to Admit into Evidence Certain Documents Pursuant to Rule 92*bis* and 89(C), 14 July 2005, where Trial Chamber I quoted from May and Wierda, International Criminal Evidence, 2002, para. 10.54, pp. 343-44.

"information that goes to proof of the acts and conduct of the accused" under Rule 92*bis* means information upon which the prosecution relies to establish the guilt of the accused – incriminating, rather than exculpatory evidence.

11. Furthermore, the term "omission to act" when considered as "acts and conduct of the accused" should be construed to refer to a breach of duty upon which the Prosecution relies to establish the guilt of the accused, not exculpatory evidence tending to show that the accused did not commit the alleged crimes or evidence that in any way tends to suggest his innocence or mitigate his guilt.[13]
12. Additionally, the Defence notes that the Prosecution's right to cross-examination does not necessarily extend to Rule 92*bis* information that is not critical or pivotal to the Indictment.[14]
13. Furthermore/alternatively, it is also established in the practice of international criminal tribunals that information going to the acts and conduct of the accused could also be admitted in circumstances similar to those in the present case. At the ICTR, the Trial Chamber admitted a statement going to acts and conduct of the accused under Rule 92*bis,* where "such a request would not have been necessary had the evidence been disclosed in accordance with Rule 68(A)".[15] In that case, the Chamber noted that "[r]igid adherence to Rule 92*bis* limitations in this instance, [would] adversely impinge on the rights of the Accused to a fair trial".[16]

Adverse Inferences

14. When a Trial Chamber, as in this case, has established a Rule 68 violation by the Prosecution, the Trial Chamber may order a remedy. The ICTR in *Prosecutor v. Ndindiliyimana et al* held that in order to grant a remedy for a breach of Rule 68

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[13] Sebutinde Rule 92*bis* Dissent, para. 16.
[14] Sebutinde Rule 92*bis* Dissent, para. 15.
[15] *Prosecutor v. Ndindiliyimana et al,* ICTR-00-56-T, Decision on Nzuwonemeye's Urgent Motion for Admission of Witness CN's Statement into Evidence, 20 March 2009, para. 11 (the Trial Chamber, having found that the Prosecution failed to disclose exculpatory material and noting that the evidence hearing phase of the trial had concluded, ordered the admission of a witness statement including information that went to acts and conduct of the accused for the purpose of assessing the credibility of another Prosecution witness's testimony) ("**Second *Ndindiliyimana* Disclosure Decision**").
[16] *Id.*

obligations, the Trial Chamber must ascertain that "material prejudice" has been caused to the accused, amounting to an infringement of his or her right to a fair trial.[17]

15. In a case such as this one where the Trial Chamber has already established a Rule 68 violation by the Prosecution, it is within its discretion to order an appropriate remedy, taking into account the scope and significance of the violation vis-à-vis the allegations in the Indictment, the persistence of the Prosecution's non-compliance, and the timing of any late disclosure in light of the stage of the proceedings.[18]

16. Potential remedies include sanctioning the Prosecution,[19] recalling Prosecution witnesses concerned for cross-examination by the Defence based on the lately-disclosed exculpatory material,[20] calling additional Defence witnesses to testify in relation to the lately-disclosed exculpatory material,[21] excluding evidence,[22] or

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[17] *Prosecutor v. Ndindiliyimana et al*, ICTR-00-56-T, Decision on Defence Motions Alleging Violations of the Prosecution's Disclosure Obligations Pursuant to Rule 68, 22 September 2008, para. 14 ("**First *Ndindiliyimana* Disclosure Decision**"); *Prosecutor v. Bralo,* IT-95-17-A, Decision on Motions for access to Ex-Parte Portions of the Record on Appeal and for Disclosure of Mitigating Material, 30 August 2006, para. 31.

[18] Second *Ndindiliyimana* Disclosure Decision, para. 14, citing *Prosecutor v. Karemera,* Decision on Joseph Nzirorera's Interlocutory Appeal (AC), 28 April 2006, paras. 8-9.

[19] This is especially the case where the Prosecution has shown persistent disregard or lack of diligence in discharging its Rule 68 obligation, to such an extent that he could be deemed to be obstructing the proceedings or in the interests of justice. Second *Ndindiliyimana* Disclosure Decision, para. 14, citing *Prosecutor v. Karemera et al,* Decision on Defence Motion for Disclosure of RPF Material and for Sanctions Against the Prosecution (TC), 19 October 2006, paras. 16-17. See also *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's Notices of Rule 68 Violation and Motions for Remedial and Punitive Measures, 25 October 2007, para. 26 (disciplinary sanctions can be imposed on the Prosecution for violation of its disclosure obligations even if no prejudice or deliberate breach of its obligations have been established if the case demonstrates a pattern of continuous lack of diligence in the exercise of the prosecutor's disclosure obligations which amount to obstructing the proceedings or are contrary to the interests of justice).

[20] Second *Ndindiliyimana* Disclosure Decision, para. 14, citing *Prosecutor v. Oric,* IT-03-68-T, Decision on Urgent Defence Motion Regarding Prosecutorial Non-Compliance with Rule 68(TC), 27 October 2005, p. 5. See also *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's Eleventh Notice of Rule 68 Violation and Motion for Stay of Proceedings, 11 September 2008, paras. 23-24 and 32.

[21] Second *Ndindiliyimana* Disclosure Decision, para. 14.

[22] The exclusion of evidence is considered an extreme remedy and will only be imposed if the Defence can demonstrate sufficient prejudice. *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's Notices of Rule 68 Violation and Motions for Remedial and Punitive Measures, 25 October 2007, para. 22; *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's Motion to Exclude the Testimony of Prosecution Witness Uphendra Baghel, 30 October 2007), para. 12; *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's Sixth, Seventh, and Eighth Notices of Disclosure Violations and Motions for Remedial, Punitive, and Other Measures, 29 November 2007, para. 30; *Prosecutor v. Nyiramasuhuko et al*, ICTR-98-42-T, Decision on Ntahobail's Motion for Exclusion of Evidence or for Recall of Prosecution Witnesses QY, SJ, and Others, 3 December 2008, para. 20.

drawing reasonable inferences from the disclosed material,[23] or admission of the material as exhibits.[24]

III. SUBMISSIONS

The Trial Chamber should accept the filing of this motion

17. At a Status Conference on 13 September 2010, the Trial Chamber ordered the Defence to file all its outstanding Motions by not later than 24 September 2010.[25] On 24 September 2010, only one day after learning of the existence of exculpatory information, and in compliance with the deadline imposed by the Trial Chamber, the Defence filed its Original Motion for disclosure.[26]

18. The Trial Chamber issued its Decision ordering disclosure on 20 October 2010 and the Prosecution disclosed the exculpatory material on 21 October 2010. This Motion is a direct result of that disclosure. Had the Prosecution disclosed the material concerned in late 2008 or early 2009, as it should have, the Defence would not have had to ask for reconsideration of the filing deadline as it now does. The belated filing is therefore not of the Defence's making. Consequently, if leave of the court is required, it is in the interests of justice for the Trial Chamber to allow this Motion outside the filing deadline.

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[23] Second *Ndindiliyimana* Disclosure Decision, para. 14, citing *Prosecutor v. Oric,* IT-03-68-T, Decision on Ongoing Complaints About Prosecutorial Non-Compliance With Rule 68 of the Rules, 13 December 2005, paras. 33 and 35 (the Trial Chamber noted why the Defence had chosen not to call or re-call further witnesses and determined that it would respond to established Rule 68 violations at the "definitive evaluation of the evidence presented by the Prosecution, and consider the possibility of drawing the reasonable inferences in favour of the accused with respect to specific evidence which has been the subject of a Rule 68 violation"). See also *Prosecutor v. Bizimungu et al*, ICTR-99-50-T, Decision on Jerome-Clement Bicamumpaka's Urgent Motion for Disclosure of Exculpatory Material, 9 February 2009, para. 12 (the Trial Chamber took the Prosecution's disclosure violation into account when weighing the evidence of the witness for whom the violation had occurred, including the lack of opportunity the Defence had to confront the witness); *Prosecutor v. Bizimungu et al*, ICTR-99-50-T, Decision on Jerome-Clement Bicamumpaka's Motion for the Recall of Witness GAP, 5 March 2009, para. 20 (given the late stage of the proceedings in which the Rule 68 violation was discovered, the Trial Chamber stated it would apply the remedy of considering the recently disclosed material when assessing the credibility of the witness).

[24] *Prosecutor v. Karemera et al*, ICTR-98-44-T, Decision on Joseph Nzirorera's 13th, 14th, and 15th Notices of Rule 68 Violation and Motions for Remedial and Punitive Measures: ZF, Michel Bakuzakundi, and Tharcisse Renzaho, 18 February 2009, paras. 33-34 (the Trial Chamber found that the recall of witnesses whose testimony may have been impeached with contradictory evidence withheld in violation of Rule 68 was not required; the withheld statements could be admitted as exhibits as a remedy if the accused so wished).

[25] *Prosecutor v. Taylor,* SCSL-03-01-T, Status Conference Transcript, 13 September 2010, p. 48323.

[26] Original Motion, para. 2, fn. 1. See also Confidential Annex D to the present motion.

19. The Defence notes that even the Trial Chamber, in holding that it was "pre-mature" to consider whether it was appropriate to draw adverse inferences from the Prosecution's non-disclosure before the material at issue had been disclosed, anticipated a further filing outside the deadline.[27] Otherwise, the Chamber's decision would be a classic illustration of the legal principle of *brutum fulmen*. The present Motion therefore naturally flows from the Trial Chamber's decision.

*Admission under Rule 92*bis

20. The Defence requests the admission of four sets of material under Rule 92*bis*:
    a. the Prosecution's cover letter and results of the DNA and forensic tests the Prosecution had performed on remains found at a site identified by witness DCT-032 during the OTP's inquiry of regarding the location of the remains of Johnny Paul Koroma, which indicated that the remains were not those of Johnny Paul Koroma;
    b. the record of disbursements made to witness DCT-032 by the Prosecution;
    c. the original copy of the letter of indemnity against prosecution before the Special Court for Sierra Leone written by Mr. Rapp to DCT-032; and
    d. the Affidavit made by DCT-032 on 23 September 2010, which provides context to the materials listed above.
21. The Trial Chamber has already determined that the material is relevant in that it affects the credibility of Prosecution allegations that Johnny Paul Koroma was killed in Liberia in 2003 at the behest of or by people subordinate to Charles Taylor.[28]
22. The materials are submitted in lieu of oral testimony as the Defence does not intend to call DCT-032 to testify.[29] The Defence is now on the verge of closing its case and the Trial Chamber has already set a scheduling order for the submission of the final

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[27] Decision, para. 33.
[28] Decision, paras. 28-29 ("the fact that DCT-032 was not able to provide the Prosecution with adequate information in relation to the burial site of Johnny Paul Koroma, despite being promised $5000 and indemnity against criminal prosecution, is potentially exculpatory in that it may affect the credibility of the Prosecution evidence implicated [sic] him in the killing"). See also fn. 5 above.
[29] *Prosecutor v. Taylor*, SCSL-03-01-T-1098, Defence Reply to Prosecution Response to Public with Confidential Annexes A-D Defence Motion for Disclosure of Exculpatory Information Relating to DCT-032, 5 October 2010, para. 10.

briefs.[30] It is therefore now impractical to call DCT-032 to testify on the issue or to recall any of the Prosecution witnesses for further cross-examination.

23. None of the documents refer directly to Mr Taylor; instead the materials focus on the conduct of the Prosecution vis-à-vis DCT-032 and their investigation into the alleged death of Johnny Paul Koroma. To the extent that DCT-032 might be considered a subordinate of Mr Taylor and thus exculpatory evidence suggesting that Mr Taylor's subordinates did not kill JPK could be erroneously characterized as an "omission to act", the Defence submits that such information does not go to proof of the acts and conduct of the accused upon which the prosecution relies to establish the guilt of the accused and thus is not barred under Rule 92*bis*.[31] Further, the death of JPK allegedly occurred in 2003, outside the scope of the Indictment period, and while going to general Prosecution allegations of malfeasance by Mr Taylor, is not so pivotal to the Prosecution that in fairness, it would require cross-examination.[32] The exculpatory information sought to be introduced by the Defence, therefore, should not be barred from admission under Rule 92*bis,* since the rationale of this prohibition under 92*bis* is to protect the fair trial rights of the Accused.[33]

24. The Defence accepts that the DNA and forensics reports disclosed by the Prosecution are *stricto sensu* expert opinion evidence[34] and are generally inadmissible under Rule 92*bis* as such evidence needs to be tested in court through cross-examination. In the present case, however, there is no dispute between the parties as to the authenticity and veracity of the DNA results. Consequently, neither party would be prejudiced if the results were admitted under Rule 92*bis*. Further/alternatively, since the request for admission of these reports stems from a Rule 68 violation, the Defence submits the Trial Chamber has the discretion to admit the results and in the interests of justice should admit the results.[35]

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[30] *Prosecutor v. Taylor,* SCSL-03-01-T-1105, Order Setting a Date for the Closure of the Defence Case and Dates for Filing of Final Trial Briefs and the Presentation of Closing Arguments, 22 October 2010.
[31] Sebutinde Rule 92*bis* Dissent, paras. 8-10 and 16.
[32] Sebutinde Rule 92*bis* Dissent, para. 11.
[33] Sebutinde Rule 92*bis* Dissent, paras. 2-3.
[34] Compare the reports, for instance, to the autopsy report that was denied admission under Rule 92*bis*. *Prosecutor v. Taylor,* SCSL-03-01-T-1070, Decision on Defence Motion for Admission of Documents Pursuant to Rule 92*bis* – Autopsy Report, 9 September 2010.
[35] See para. 13 and fn. 34 above.

25. The Defence submits that the admission of the attached materials under Rule 92*bis* would allow the Trial Chamber to fully consider full content of the material and be in a position to properly evaluate the evidence either now, or during Judgement deliberations, having taken into account the nature and effect of the exculpatory material disclosed.[36]

Need to Draw Adverse Inference

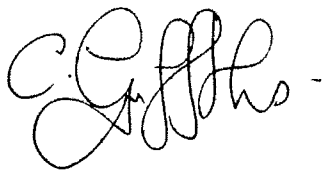
26. The Defence submits that its request for the Trial Chamber to draw adverse inferences relating to the Prosecution evidence and the credibility of Prosecution witnesses who testified about the alleged death of Johnny Paul Koroma is most reasonable in the present circumstances.

27. The late stage of the proceedings makes it impractical, if not impossible, for the Defence to recall the three relevant Prosecution witnesses for cross-examination and/or to call DCT-032 and/or an expert witness to testify on the attached material. The Defence has been prejudiced by the Prosecution's failure to disclose this information at a time when it could have been meaningfully used during the Prosecution or Defence case.[37]

IV. CONCLUSION AND RELIEF REQUESTED

28. The Defence seeks the admission of the four documents under Rule 92*bis* and/or invites the Trial Chamber to draw adverse inferences on the basis of the attached material in light of the Prosecution's Rule 68 disclosure violation.

Respectfully Submitted,



Courtenay Griffiths, Q.C.
Lead Counsel for Charles G. Taylor
Dated this 27th Day of October 2010,
The Hague, The Netherlands

[36] Decision, Separate Concurring Opinion of Justice Julia Sebutinde, para. 5.
[37] Decision, Separate Concurring Opinion of Justice Julia Sebutinde, para. 3.

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CONFIDENTIAL DOCUMENT CERTIFICATE

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

Case Name: **The Prosecutor – v- Charles Ghankay Taylor**
Case Number: **SCSL-03-01-T**
Document Index Number: **1108**
Document Date: **27 October 2010**
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☐ Application
☐ Order
☐ Indictment
☐ Other
☒ **Motion**
☐ Correspondence

Document Title:

Public with confidential Annexes A-D Defence motion for admission of documents and drawing of an adverse inference relating to the alleged death of Johnny Paul Koroma

Name of Officer:

Alhassan Fornah

Signed: