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SCSL-03-01-T  
(34818-34826)

34818



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

**TRIAL CHAMBER II**

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

Registrar: Ms. Binta Mansaray

Date filed: 25 February 2011

SPECIAL COURT FOR SIERRA LEONE	
<b>RECEIVED</b>	
COURT MANAGEMENT	
THE HAGUE	
25 FEB 2011	
NAME	ALIMASSAN FORDIAH
SIGN	<i>[Signature]</i>
TIME	13:08

**THE PROSECUTOR**

**Against**

**Charles Ghankay Taylor**

Case No. SCSL-03-01-T

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**PUBLIC WITH CONFIDENTIAL ANNEXES A & B**

**URGENT PROSECUTION REQUEST TO SUPPLEMENT THE 'PUBLIC WITH CONFIDENTIAL ANNEXES A TO E & PUBLIC ANNEX F URGENT PROSECUTION MOTION FOR AN INVESTIGATION INTO CONTEMPT OF THE SPECIAL COURT FOR SIERRA LEONE'**

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Office of the Prosecutor:  
Ms. Brenda J. Hollis  
Mr. Mohamed A. Bangura  
Mr. Nathan Quick

Counsel for the Accused:  
Mr. Courtenay Griffiths, Q.C.  
Mr. Terry Munyard  
Mr. Morris Anyah  
Mr. Silas Chekera  
Mr. James Supuwood  
Ms. Logan Hambrick

1. The Prosecution urgently requests leave of the Trial Chamber to supplement the “Public with Confidential Annexes A to E & Public Annex F Urgent Prosecution Motion for an Investigation into Contempt of the Special Court for Sierra Leone.”<sup>1</sup> The recording and accompanying transcript provided at **Confidential Annexes A and B** may be of assistance to the Chamber in assessing the 3 February Contempt Motion. Accordingly, the Prosecution requests the Trial Chamber to supplement the 3 February Contempt Motion with the recording and accompanying transcript.
2. Considering the serious and on-going nature of the allegations in the 3 February Contempt Motion,<sup>2</sup> the Prosecution files this request urgently and requests an expedited filing schedule.
3. The Prosecution endeavored to bring the serious allegations contained in the 3 February Contempt Motion to the prompt attention of the Trial Chamber. Therefore, the Prosecution urgently filed the 3 February Contempt Motion after obtaining a statement from TF1-585. This statement was signed and affirmed on 1 February 2011<sup>3</sup> and was the last of three witness statements to be signed and affirmed before filing of the 3 February Contempt Motion.<sup>4</sup> Only after promptly and urgently bringing the allegations set out in the 3 February Contempt Motion to the attention of the Trial Chamber did the Prosecution have the ability and opportunity, considering difficulties encountered in adequately translating the Mende portions of the recording, to translate the telephone recording of the conversation between TF1-585 and Eric Koi Senesie.<sup>5</sup> After resolving the translation difficulties, the Prosecution traveled to TF1-585’s location to review the transcript and recording with the witness. Thus, the Prosecution only received the transcript and recording in The Hague on 23 February and now promptly brings them to the attention of the Court.
4. The recording and transcript may be of particular assistance to the Trial Chamber for

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<sup>1</sup> *Prosecutor v. Taylor*, SCSL-03-01-T-1185, Public with Confidential Annexes A to E & Public Annex F Urgent Prosecution Motion for an Investigation into Contempt of the Special Court for Sierra Leone, 3 February 2011 (“**3 February Contempt Motion**”).

<sup>2</sup> 7 February Contempt Motion, para. 2.

<sup>3</sup> 3 February Contempt Motion, Confidential Annex D.

<sup>4</sup> See 3 February Contempt Motion, Confidential Annexes B and C, dated 30 and 31 January 2011, respectively.

<sup>5</sup> See the reference to this recording at 3 February Contempt Motion, Confidential Annex D, p. 3. The relevant recording and transcript are provided at **Confidential Annexes A and B** of this request.

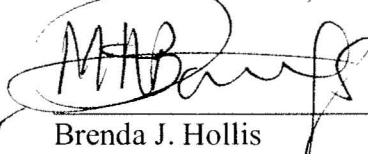
two reasons. First, Senesie read from a previously prepared document addressed to Taylor's Defence Counsel. Senesie then asked TF1-585 to sign this document, thereby agreeing to speak to the "Defence" and swearing to "defend Charles Taylor before the Special Court."<sup>6</sup> Further, Senesie explained that "the case" was being delayed until they "get" people like TF1-585.<sup>7</sup> According to Senesie, this effort to "get" 30 or more witnesses was already underway in other districts in Sierra Leone.<sup>8</sup>

5. For the reasons discussed above, the Prosecution requests the Trial Chamber to accept the supplemental recording and unofficial reviewed translation provided at **Confidential Annexes A and B** and referred to in the 3 February Contempt Motion.

Filed in The Hague,

25 February 2011

For the Prosecution,

for   
Brenda J. Hollis  
The Prosecutor

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<sup>6</sup> Confidential Annex B, p. 1.

<sup>7</sup> Confidential Annex B, p. 3.

<sup>8</sup> Confidential Annex B, p. 3.

## INDEX OF AUTHORITIES

**SCSL*****Prosecutor v. Taylor, SCSL-03-01-T***

*Prosecutor v. Taylor*, SCSL-03-01-T-1185, Public with Confidential Annexes A to E & Public Annex F Urgent Prosecution Motion for an Investigation into Contempt of the Special Court for Sierra Leone, 3 February 2011



**SPECIAL COURT FOR SIERRA LEONE**

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Court Management Section – Court Records

**CONFIDENTIAL DOCUMENT CERTIFICATE**

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

Case Name: **The Prosecutor – v- Charles Ghankay Taylor**

Case Number: **SCSL-03-01-T**

Document Index Number: **1216**

Document Date: **25 February 2011**

Filing Date: **25 February 2011**

Document Type: **Confidential Annexes A and B**

Number of Pages: **5** Number from: **34822-34826**

- Application
- Order
- Indictment
- Other**
- Motion
- Correspondence

Document Title:

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

Name of Officer:

Alhassan Fornah

Signed: