SCSL-03-01-PT 5386 - 5421

SPECIAL COURT FOR SIERRA LEONE OFFICE OF THE PROSECUTOR Freetown – Sierra Leone

Before:

Hon. Justice Julia Sebutinde, Presiding Hon. Justice Richard Lussick Hon. Justice Teresa Doherty

Acting Registrar:

Date filed:

Mr. Herman von Hebel

17 April 2007

THE PROSECUTOR

Against

Charles Ghankay Taylor

Case No. SCSL-03-01-PT

PUBLIC

PROSECUTION CORRIGENDUM & MOTION FOR LEAVE TO SUBSTITUTE PAGES OF THE PROSECUTION RULE 73bis PRE-TRIAL CONFERENCE MATERIALS

Office of the Prosecutor: Ms. Brenda J. Hollis Defence Counsel for Charles Ghankay Taylor Mr. Karim A. A. Khan Mr. Roger Sahota

SPECIAL GOURT FOR SIERRA LEONE RECEIVED GOURT MANAGEMENT 17. APR 2007 NAME HONGE GEORGE SIGN CONTENT

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I. INTRODUCTION

- On 4 April 2007 the Prosecution filed "Rule 73bis Pre-Trial Conference Materials" which comprised of: (i) a pre-trial brief ("Pre-Trial Brief"); (ii) a witness list ("Witness List"); (iii) summaries of the facts to which each witness will testify; (iv) an expert witness list; and (v) an exhibit list ("Exhibit List") (which materials are together hereinafter referred to as the "PTC Materials").¹
- 2. It has now come to the attention of the Prosecution that the PTC Materials contained certain typographical and other errors including the inadvertent deletion of words between pages 13 and 14 of the Pre-Trial Brief and the erroneous submission of a signature page of the Pre-Trial Brief which contained duplicative text. Accordingly, the Prosecution files this corrigendum to correct the Court record. The Prosecution also seeks leave to substitute corrected pages for those pages of the PTC Materials which are the subject of the corrigendum. The corrected pages are set out in the attached four annexes.

II. CORRIGENDUM

3. The Prosecution corrects the Pre-Trial Brief as set out in the chart below. In the fourth column of the chart new text is shown underlined and deletions are shown as strikethrough.

	Location	Original Text	Text highlighting corrections	Corrected Text
1.	Page 2,	Duopo Makerzon	Duopo Makerzon <u>(or</u>	Duopo Makerzon (or
	para. 9		<u>Duopo Merkazon or</u>	Duopo Merkazon or
			Dopo Megazon or	Dopo Megazon or
			Dopoe Megazon)	Dopoe Megazon) ²
2.	Page 16,	Duopo Merkazon	Duopo Merkazon	Duopo Makerzon (or
	para. 62		Duopo Makerzon (or	Duopo Merkazon or

¹ Prosecutor v. Taylor, SCSL-03-01-PT-218, "Public Rule 73 bis Pre-Trial Conference Materials", 4 April 2007.

² See Annex 1 for a corrected page 2 of the Pre-Trial Brief.

	Location	Original Text	Text highlighting corrections	Corrected Text
13000 2349 Michael 13			Duopo Merkazon or	Dopo Megazon or
			Dopo Megazon or	Dopoe Megazon) ³
			Dopoe Megazon)	
3.	Page 4,	The attack was	The attack was	The attack was
	footnote 10	widespread and	widespread and	widespread and
		systematic; however,	systematic; however,	systematic; however,
		the requirement is	the requirement is	the requirement is
		only that the attack	only that the attack	only that the attack
		be widespread or	be widespread or	be widespread or
		systematic." Rule	systematic." <u>See</u>	systematic." See
		98 Decision, para.	<u>Prosecutor v. Brima,</u>	Prosecutor v. Brima,
		42(b).	<u>Kamara & Kanu</u>	Kamara & Kanu
			case, SCSL-04-16-	case, SCSL-04-16-
			T-469, Decision on	T-469, Decision on
			Defence Motions for	Defence Motions for
			Judgement of	Judgement of
			Acquittal Pursuant to	Acquittal Pursuant to
			Rule 98, 31 March	Rule 98, 31 March
			<u>2006 ("</u> Rule 98	2006 ("Rule 98
			Decision <u>")</u> , para.	Decision"), para.
			42(b).	42(b). ⁴
4.	Page 7,	United Liberation	United Liberation	United Liberation
	para. 25	Movement of	Movement for	Movement for
		Liberia	Democracy in of	Democracy in
			Liberia	Liberia ⁵
5.	Pages 13 &	This assistance was	This assistance was	This assistance was

³ See Annex 1 for a corrected page 16 of the Pre-Trial Brief.
⁴ See Annex 1 for a corrected page 4 of the Pre-Trial Brief.
⁵ See Annex 1 for a corrected page 7 of the Pre-Trial Brief.

	Location	Original Text	Text highlighting corrections	Corrected Text
	14, para. 54	most frequently	most frequently	most frequently
		provided during the	provided during the	provided during the
		periods from about	periods from about	periods from about
		1990 until about	1990 until about	1990 until about
		1994, and from	1994, and from	1994, and from
		about early 1998	about early 1998	about early 1998
		ammunition to	through early 2002.	through early 2002.
		Magburaka air strip,	The materiel	The materiel
		Tonkolili District, in	provided included	provided included
		the fall of 1997, and	the shipment of arms	the shipment of arms
		the shipments used	and ammunition to	and ammunition to
ł		for the attack against	Magburaka air strip,	Magburaka air strip,
		Koidu, Makeni and	Tonkolili District, in	Tonkolili District, in
		many other locations	the fall of 1997, and	the fall of 1997, and
		in late 1998, as part	the shipments used	the shipments used
		of the operation to	for the attack against	for the attack against
		re-take Kono and	Koidu, Makeni and	Koidu, Makeni and
		Freetown.	many other locations	many other locations
			in late 1998, as part	in late 1998, as part
			of the operation to	of the operation to
			re-take Kono and	re-take Kono and
			Freetown.	Freetown. ⁶
6.	Page 16,	In addition, from	In addition, from	In addition, from
	para. 62	1998 until the end of	1998 until the end of	1998 until the end of
		the conflict, the	the conflict, the	the conflict, the
		Accused regularly	Accused regularly	Accused regularly
		sent regularly sent	sent-regularly sent	sent Liberian

⁶ See Annex 1 for corrected pages 13 and 14 of the Pre-Trial Brief.

	Location	Original Text	Text highlighting corrections	Corrected Text
1997 OF 1977 AUGUST		Liberian	Liberian	subordinates and
		subordinates and	subordinates and	associates to Sierra
		associates to Sierra	associates to Sierra	Leone to provide
		Leone to provide	Leone to provide	guidance and advice
		guidance and advice	guidance and advice	to Bockarie and Issa
		to Bockarie and Issa	to Bockarie and Issa	Sesay. ⁷
		Sesay.	Sesay.	

- 4. The Prosecution further corrects the Pre-Trial Brief to delete the first thirteen lines of page 47 being the section which starts with the words "duty to investigate ... " and ends with the words "... 12 August 1949, to which the".⁸
- 5. The Prosecution corrects the Witness List in order to refer to "Predominantly Crime Base" rather than "Predominantly Back-up" in paragraphs 1 and 2 of page 6.⁹
- 6. The Prosecution corrects the Exhibit List as follows: Core Exhibit List¹⁰
 - Page 6, Ex. #1.032: the first date should be corrected to read (a) "14/07/1997", not "14/06/1997".
 - Page 8, Ex. #1.041: the description should be corrected to read "Report (b) from Sam Bockarie to Charles Taylor dated 24/06/1998 informing him that the Guinean forces, together with ECOMOG, are carrying out cross border attacks in Koidu and Kailahun."
 - Page 8, Ex. #1.042: the date column should be corrected to read "08/1999 (c) to 01/2000", not "03/1999 to 01/2000".
 - Page 9, Ex. #1.047: the date should be corrected to read "28/04/1999 to (d) 11/09/1999", not "27/07/1999", and "Excerpt" should be corrected to read

 ⁷ See Annex 1 for a corrected page 16 of the Pre-Trial Brief.
 ⁸ See Annex 1 for a corrected page 47 of the Pre-Trial Brief.

⁹ See Annex 2 for a corrected page 6 of the Witness List.

¹⁰ See Annex 3 for the corrected pages of the Core Exhibit List.



"Excerpts" in the description column.

- (e) Page 12, Ex. #1.067: delete the numbers in the ERN column and insert the words "Public Document".¹¹
- Page 19, Ex. #1.101: the description should be corrected to read: "Report (f) from RUF 2nd Brigade HOs, Kono District, Major Mohamed Christopha."
- Page 20, Ex. #1.109: insert "-00028920" at the end of the ERN column. (g)
- Page 21, Ex. #1.111: the ERN should be corrected to read "00029303", (h) not "00029298-00029303".
- Page 27, Ex. #1.141: insert "-00028256" at the end of the ERN column. (i)
- Page 27, Ex. #1.142: insert "-00028258" at the end of the ERN column. (i)
- Page 45, Ex. #1.238: the date should be corrected to read "09/04/2000-(k) 05/05/2000", not "03/05/2000".
- Page 57, Ex. #1.309: correct "CT" to "Charles Taylor". (1)
- Page 58, Ex. #1.310: delete "& 09/03/2002" from the date column and (m) change the ERN range to "00029025-00029026".

Back-Up Exhibit List¹²

- Page 3, Ex. #2.011: the date should be corrected to read "23/09/1999 to (a) 16/04/2000", not "28/12/1999", and "Excerpt" should be corrected to read "Excerpts" in the description column.
- Page 8, Ex. #2.046: the date should be corrected to read "01/1999", not (b) "01/01/1999" in the date column.
- Page 22, Ex. #2.127: this exhibit is a photograph containing two articles. (c) The corrected title in the description column should read: In Sierra Leone: ECOMOG Threatens Civilians and Taylor Vetos LINA Bill.
- Page 32, Ex. #2.186: the date in the description column and in the date (d) column should be corrected to read "04-05/05/2000", not "05/05/2000".
- Page 37, Ex. #2.217: insert "Diamonds: Video of a" at the beginning of (e) the description column. Delete the second sentence from the description column, which begins with "Regarding conflict diamonds..."

 ¹¹ The report can be found at <u>http://www.hrw.org/reports/1999/sierra</u>.
 ¹² See Annex 4 for the corrected pages of the Back-up Exhibit List

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III. APPLICATION

7. In order to facilitate the use of the PTC Materials in light of the above corrections, the Prosecution seeks leave to substitute the corrected pages set out in the attached annexes for the corresponding original pages of the PTC Materials.

IV. CONCLUSION

- 8. The Prosecution:
 - (a) corrects the Court record as set out in paragraphs 3 to 6 above; and
 - (b) requests that the Trial Chamber order that the original pages of the PTC Materials be replaced by the corrected pages set out in the attached annexes.

Filed in Freetown, 17 April 2007 For the Prosecution,

Brenda J. Hoelis

Brenda J. Hollis Senior Trial Attorney

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Index of Authorities

Prosecutor v. Taylor, SCSL-03-01-PT-218, "Public Rule 73 bis Pre-Trial Conference Materials", 4 April 2007.

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ANNEX 1

Corrected Pages of the Pre-Trial Brief

The following pages of the Pre-Trial Brief are set out in this Annex 1:

- Page 2
- Page 4
- Page 7
- Pages 13-14
- Page 16
- Page 47

The Emergence of the Common Plan, Design or Purpose (Common Plan)

- Prior to the commencement of the armed conflict in Sierra Leone, and throughout the 6. armed conflict, the Accused participated in a common plan, design or purpose to gain and maintain political power and physical control over the territory of Sierra Leone, in particular the diamond mining areas, in order to exploit the natural resources of the country. Implementation of this common plan included overthrowing the government of Sierra Leone in order to facilitate access to its natural resources and to install a government that would be well disposed toward, and supportive of, the Accused's interests and objectives in Liberia and the region.⁴
- This common plan amounted to or involved the commission of the crimes alleged in 7. the Amended Indictment (Indictment). From its inception, the Accused and the other participants in the common plan used criminal means to achieve and hold political power and physical control over the civilian population of Sierra Leone. These criminal means involved the campaign of terror waged against the civilian population of Sierra Leone, including widespread and continuing killings, rapes, beatings and mutilations, enslavement of the civilian population for use as fighters, "bush wives" and forced labour, looting and burning of civilian property. Children were used to carry out this criminal campaign and in active hostilities.⁵
- The Accused, as leader of the NPFL was instrumental in the creation of this common 8. plan. The Accused and Foday Sankoh, the leader of the RUF (Revolutionary United Front), made common cause to assist each other in their respective countries to achieve the common plan. From the outset, the Accused and his forces worked virtually as one with Sankoh and his RUF forces, and with the organised armed groups and forces that later evolved. To that end, Sankoh and his RUF forces assisted the Accused during the Liberian armed conflict which commenced in 1989.6
- The Accused assumed and maintained the overall leadership role in the 9. implementation of the common plan. Liberian subordinates of the Accused, including Benjamin Yeaten, also known as (aka) "50" or "General 50", Musa Sesay aka Musa Cisse, Grace Minor, Joe Tuah, Roland Duoh, Christopher Varmoh aka "Liberian Mosquito", Momoh Gibba, Duopo Makerzon (or Duopo Merkazon or Dopo Megazon or Dopoe Megazon), Sampson Weah, and Zig Zag Marzah

⁴ Exs. 1.011; 1.018.

⁵ Wits. TF1-020; 071; 139; 227; 334; 336; 366; 532; Ellis. Exs. 1.020; 1.021; 1.067; 1.082; 1.095; 1.152; 1.155;

^{1.156; 1.157; 1.159; 1.169; 1.170; 1.177; 1.178; 1.184; 1.295.}

⁶ Wits. TF1-168; 274; 275; 515; 532; 542; Ellis. Exs. 1.058; 1.138; 1.141; 1.157; 1.232; 1.254; 1.261; 1.269.

continued to participate in this common plan. Therefore, the crimes charged in the Indictment were foreseeable consequences of the common plan.⁹

The Context in which the Common Plan was Implemented

- 12. The Accused participated in the common plan in a variety of ways: by planning, ordering, instigating and aiding and abetting the commission of the crimes carried out as part of a widespread and systematic attack¹⁰ against the civilian population of Sierra Leone and in the context of the armed conflict in that country. This armed conflict began in March 1991, when Sankoh's RUF and the Accused's NPFL forces attacked Sierra Leone.¹¹
- 13. The participants in the armed conflict included members of the RUF which mounted the initial armed attacks into Sierra Leone along with members of the NPFL. During the armed conflict, RUF forces were commonly referred to as "RUF", "rebels" and "People's Army." RUF members who were trained in Libya, including Sankoh, were known as "Special Forces"; that status conferred power and recognition. The NPFL also had such "Special Forces". RUF members trained in Liberia, including Issa Sesay, Morris Kallon, Augustine Gbao, were known as "Vanguards"; this status also conferred power and recognition. RUF members trained by the Vanguards in Sierra Leone at the beginning of the war were known as "Junior Commandos".¹²
- 14. Another organised armed group which participated in the armed conflict was the AFRC (Armed Forces Revolutionary Council), which took control of Sierra Leone after a coup on May 25, 1997. The AFRC was comprised predominantly of members of the Sierra Leone Army (SLA). At the invitation of the Chairman of the AFRC, Johnny Paul Koroma, and upon Sankoh's order, the RUF joined with the AFRC within days of the coup. The AFRC and RUF formed a joint government (Junta). The Junta created the Supreme Council as its governing body. This body included leaders of both the AFRC and the RUF. The Junta forces were commonly referred to as "Junta", "rebels", "soldiers", "SLA", "ex-SLA" and "People's Army". After the

⁹ Wits. TF1-041; 045; 046; 151; 274; 360; 371; 388; 401; 515; 516; 548; 554; 565; 567; Ellis. Exs. 1.008; 1.020; 1.021; 1.066; 1.129; 1.130; 1.158; 1.180; 1.218.

¹⁰ The attack was widespread and systematic; however, the requirement is only that the attack be widespread or systematic. See *Prosecutor v. Brima, Kamara & Kanu* case, SCSL-04-16-T-469, Decision on Defence Motions for Judgement of Acquittal Pursuant to Rule 98, 31 March 2006 ("Rule 98 Decision"), para. 42(b).

¹¹ Wits. TF1-046; 168; 355; 371; 515; 532; 542; 566; Ellis. Exs. 1.018; 1.041; 1.058; 1.067; 1.091; 1.221; 1.232.

¹² Wits. TF1-036; 046; 151; 168; 362; 366; 371. Exs. 1.067; 1.091; 1.137; 1.138; 1.140; 1.141; 1.151; 1.208; 1.232; 1.254; 1.261; 1.263; 1.269; 1.306.

commencement of armed hostilities in Sierra Leone. They were carried out pursuant to the Accused's direction and with his assistance.²²

- 24. From the commencement of the conflict in 1991, until about 1994, the Accused exercised authority and control over the RUF. Most of the commanders of the composite force which initiated the conflict in Sierra Leone were members of the NPFL. The Accused was the superior commander over this composite force.²³
- 25. From about 1993 or 1994 until about 1996, ULIMO (United Liberation Movement for Democracy in Liberia) was in control of the border areas in Lofa County, cutting off a main supply and access route to Sierra Leone. During this time, the Accused maintained his position of individual or joint control and authority over the RUF through radio communications with Sankoh.²⁴
- 26. The Accused, individually or in concert with Sankoh, exercised authority and control over the RUF and the RUF component of the Junta, from about 1996 until about April 1997, when Sankoh was arrested and detained in Nigeria. At that time, Sankoh conveyed an order to his subordinates that they were to take orders from the Accused. After the Junta was forced from power, except for a short period in 1999 and 2000, the Accused exercised individual control and authority over the AFRC/RUF.²⁵
- 27. After Sankoh's arrest and detention in 1997, he appointed Bockarie as the in-country leader of the RUF. At a meeting in Kono, Johnny Paul Koroma stated that Bockarie would now be in control of the AFRC component as well. Bockarie was headquartered in Buedu, Kailahun District. Bockarie's next in command was Issa Sesay. Other senior level leaders of the AFRC/RUF included those persons mentioned in paragraph 15 above. Bockarie took his instructions from the Accused and/or his senior level subordinates. As discussed in paragraph 94 below, after the Junta was overthrown by ECOMOG (Economic Community of West African States Monitoring Group), a group of AFRC broke away from the AFRC/RUF alliance, however, most AFRC remained in the alliance and reported to Bockarie.²⁶

²² Wits. TF1-036; 046; 371; 532; 546; 547; 548; 561; Ellis. Exs. 1.176; 1.208; 1.265; 1.306; 1.362.

²³ Wits TF1-046, 399, 547, 548

²⁴ Wit. TF1-274; 275; 366; 515.

²⁵ Wits. TF1-151; 274; 276; 371; 338; 355; 413; 515; 516; 532; 542; 558; 565; 567; 568. Exs. 1.058; 1.096; 1.161; 1.165; 1.230; 1.237; 1.303.

²⁶ Wits. TF1-036; 167; 184; 274; 276; 334; 338; 360; 371; 376; 374; 375; 377; 388; 399; 406; 515; 516; 532; 542; 565. Exs. 1.018; 1.022; 1.036; 1.051; 1.052; 1.057; 1.058; 1.066; 1.081; 1.085; 1.106; 1.230; 1.237; 1.303.

civilian population of Sierra Leone. The Accused provided continuing assistance to the RUF, Junta, AFRC/RUF, including arms, ammunition and other materiel, manpower, military training, facilities and safe havens in Liberia, strategic and tactical advice, direction and encouragement, and other assistance.⁴⁶

- 51. This assistance enabled the members of the RUF, Junta and AFRC/RUF to carry out the campaign of terror charged in Counts 1 through 11 of the Indictment. The Accused's assistance had a substantial effect on the ability of the RUF, Junta and AFRC/RUF to commit the murders, mutilations and beatings, rapes, sexual slavery, enslavement, looting and other crimes charged in the Indictment. The Accused provided this assistance with full knowledge that these crimes had been and were being committed, or with the awareness of the substantial likelihood that his assistance, encouragement, or moral support would assist the commission of these crimes.⁴⁷
- 52. The assistance provided by the Accused was curtailed from about 1994 until about 1996 when ULIMO controlled much of the border area between Liberia and Sierra Leone, in particular, the border area between Sierra Leone and Lofa County. During this time, the Accused continued to provide direction, advice and encouragement to the RUF via radio and phone contact. During this period, the Accused directed the RUF to construct an airstrip in Kailahun District. The Accused and RUF were unable to use this airstrip because of attacks from ECOMOG jets.⁴⁸
- 53. The RUF, Junta and AFRC/RUF gave the Accused diamonds obtained from Sierra Leone for arms, ammunition and other supplies which he provided.⁴⁹

Arms and Ammunition

54. Prior to the commencement of the armed conflict in Sierra Leone, and during the conflict, the Accused provided the RUF, Junta and AFRC/RUF with arms, ammunition and associated materiel. This assistance was most frequently provided during the periods from about 1990 until about 1994, and from about early 1998

⁴⁶ Wits. TF1-041; 046; 071; 151; 251; 274; 275; 276; 319; 338; 366; 367; 370; 371; 374; 375; 376; 385; 388;
390; 395; 399; 401; 413; 406; 521; 515; 516; 532; 539; 540; 542, 566; 567; 568; 569; Smillie; Keen; Ellis. Exs.
1.022; 1.036; 1.058; 1.079; 1.080; 1.081; 1.085; 1.092; 1.093; 1.109; 1.113; 1.119; 1.120; 1.151; 1.197; 1.201;
1.217.

⁴⁷ Exs. 1.018; 1.023; 1.041; 1.058; 1.080; 1.099; 1.113.

⁴⁸ Wits. TF1-274; 275; 360; 515; 516.

⁴⁹ Wits. TF1-036; 139; 151; 274; 276; 360; 366; 367; 371; 374; 375; 385; 388; 395; 399; 406; 413; 481; 515; 516; 532; 539; 540; 542. Exs. 1.045; 1.063; 1.085; 1.130; 1.161; 1.164; 1.219; 1.239.

through early 2002. The materiel provided included the shipment of arms and ammunition to Magburaka air strip, Tonkolili District, in the fall of 1997, and the shipments used for the attack against Koidu, Makeni and many other locations in late 1998, as part of the operation to re-take Kono and Freetown.⁵⁰

55. The materiel was stored in facilities at various locations in Liberia, including the Accused's residences in Gbarnga and Monrovia, and at the Executive Mansion in Monrovia. Subordinates of the Accused working at these storage facilities would provide the materiel to the RUF, Junta, and AFRC/RUF on the instructions of the Accused. These instructions were usually communicated through a senior level subordinate such as Benjamin Yeaten.⁵¹

Manpower

- The Accused provided subordinate Liberian personnel to assist the RUF, Junta in 56. particular the RUF component and AFRC/RUF throughout the early 1990s and throughout the conflict. For instance, in 1998, the Accused sent several hundred men of the Scorpion Unit to fight with the RUF. The Accused drew these personnel from the NPFL, other organised armed groups within Liberia, the Liberian population in general and, after the Accused became President, from the AFL, special units such as SSS and ATU and the LNP. These personnel functioned in a variety of roles, for example, as fighters, trainers, and communications operators. In the early years of the armed conflict in Sierra Leone, some of these personnel were in positions of superior authority over both the Liberian and RUF fighters in their units. These commanders and their Liberian fighters were subordinate only to the Accused. After most of the initial Liberian contingent was withdrawn, many remained, some in command positions in the RUF, e.g. Dennis Mingo aka "Superman". The Accused also provided personnel for particular operations, such as for the attack on Freetown in January 1999.⁵²
- 57. In addition to the fighters, military trainers and communications operators, the Accused also provided personnel to facilitate the movement of RUF, Junta, and AFRC/RUF members between Sierra Leone and Liberia. These personnel also

⁵⁰ Wits. TF1-036; 045; 046; 071; 139; 151; 275; 276; 334; 337; 338; 360; 366; 367; 371; 374; 375; 376; 377; 385; 387; 388; 390; 399; 413; 516; 521; 546; 532; 539; 542; 547; 548; 558; 565; 567; 568; 569; 570.

Exs. 1.018; 1.022; 1.058; 1.080; 1.081; 1.085; 1.092; 1.093; 1.109; 1.113; 1.120; 1.151; 1.191.

 ⁵¹ Wit. TF1-046; 371; 385; 565; 570. Exs. 1.081; 1.107; 1.119; 1.120; 1.124; 1.231; 1.243; 1.267; 1.275; 1.358.
 ⁵² Wits. TF1-041; 046; 401; 251; 275; 276; 338; 366; 371; 399; 401; 406; 515; 546; 558. Exs. 1.007; 1.018; 1.046; 1.067; 1.091; 1.094; 1.115; 1.232; 1.243; 1.254; 1.259; 1.275.



NPFL base in Bomi Hills. The Accused provided Sankoh with a residence in Gbarnga, from which he made trips to RUF locations in Sierra Leone to distribute arms, ammunition and other materiel and supplies provided by the Accused. Additional facilities made available to the AFRC/RUF included a guest house in Monrovia, from about 1998 through about 2001. The Accused provided the security for this guest house, the domestic staff, and equipment for the communications centre established there to enable continuous communication between the guest house and RUF, Junta and AFRC/RUF locations in Sierra Leone.⁵⁶

61. In the early years of the conflict in Sierra Leone, the RUF would fall back into areas of Liberia controlled by the Accused in order to avoid capture or elimination by Sierra Leonean government forces or those assisting the government forces. The RUF fighters would retreat to NPFL areas and bases or facilities such as those at Bomi Hills, where they would rest and reorganise. The Accused would re-provision these fighters with arms and ammunition in preparation for their return to Sierra Leone to continue their attacks against the civilian population.⁵⁷

Strategic and Tactical Advice, Direction and Encouragement

62. Throughout the conflict, the Accused provided advice, direction and encouragement to the RUF, Junta - in particular the RUF component, and the AFRC/RUF. As discussed above in paragraphs 11 and 26-28, leaders of these groups conferred with the Accused before making significant decisions and were in frequent contact with him. In addition, from 1998 until the end of the conflict, the Accused regularly sent Liberian subordinates and associates to Sierra Leone to provide guidance and advice to Bockarie and Issa Sesay. These personnel included, but were not limited to, Benjamin Yeaten, Ibrahim Bah, Musa Sesay, Duopo Makerzon (or Duopo Merkazon or Dopo Megazon or Dopoe Megazon), Christopher Varmoh, Daniel Tamba aka "Jungle." They provided advice and guidance on military and strategy matters and also regarding the mining operations in Kono district.⁵⁸

⁵⁶ Wits. TF1-139; 151; 371; 377; 387; 542; 546; 567. Exs. 1.018; 1.022; 1.120; 1.141; 1.248.

⁵⁷ Wits. TF1-539; 399; 045; Ex. 1.267.

⁵⁸ Wits. TF1-139; 319; 370; 371; 375; 385; 390; 413; 515; 516; 532; 539; 542; 547. Exs. 1.023; 1.036; 1.049; 1.058; 1.081; 1.222; 1.358.

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Republic of Sierra Leone succeeded on 10 June 1965, and the Republic of Liberia acceded on 29 March 1954 and Additional Protocol II to the Geneva Conventions, to which the Republic of Sierra Leone acceded on 21 October 1986, and the Republic of Liberia acceded on 30 June 1988.

Filed in Freetown, 4 April 2007

For the Prosecution,

Brenda & Hollis

Brenda J. Hollis Senior Trial Attorney

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ANNEX 2

Corrected Page of the Witness List

Page 6 of the Witness List is set out in this Annex 2.



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SPECIAL COURT FOR SIERRA LEONE OFFICE OF THE PROSECUTOR

WITNESS NUMBERS

1.	Core Witness Numbers	
	Predominantly Linkage Predominantly Crime Base Total	62 <u>77</u> <u>139</u>
2.	Back-up Witness Numbers	
	Predominantly Linkage Predominantly Crime Base Total	25 <u>40</u> <u>65</u>
3.	Core & Back-up Witness Numbers	
	Witness Total	<u>204</u>
4.	Expert Witness Numbers	
	Experts Total	<u>11</u>
5.	Viva Voce Witness Numbers	
	Core Viva Voce Predominantly Linkage Predominantly Crime Base Experts Total	45 11 <u>11</u> <u>67</u>
	Back-up Viva Voce Predominantly Linkage Predominantly Crime Base Total	$\begin{array}{c} 23\\ \underline{0}\\ \underline{23} \end{array}$
6.	Rule 92 <i>bis</i> Witness Numbers	
	Core Rule 92 bis Predominantly Linkage Predominantly Crime Base Total	09 <u>66</u> <u>75</u>

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ANNEX 3 Corrected Pages of the Exhibit List (Core Exhibit List)

The following pages of the Core Exhibit List are set out in this Annex 3:

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Ex. #	Title/Description	Date	ERN	Relevance	Indictment	
1.028	AFRC Decrees No. 2, 3 and 4. Establishing parts	10/07/1997	00007650-	□Notice	ICR, Counts 1-11	
	of the Junta Government.	&	00007661	⊠Contextual	(5; 9; 14; 18; 22;	
		14/07/1997			23; 28; 33; 34)	
				Nother 2		
1.029	Supplement to the Sierra Leone Gazette No. 49 -	19/08/1997	00007662-	□ Notice	ICR, Counts 1-11	
	AFRC Decree No. 5. Imposing a curfew		00007662	⊠Contextual	(5; 9; 14; 18; 22;	
	throughout Sierra Leone.		A	CB CB Mother	23; 28; 33; 34)	
1.030	Supplement to the SL Gazette No. 34 - AFRC	28/05/1997	00007671-	□ Notice	ICR, Counts 1-11	
_	Proclamation - Public Notice No. 3 of 1997.		00007674	\boxtimes Contextual	(5; 9; 14; 18; 22;	
	Establishes the Junta and proclaims the				23; 28; 33; 34)	
	overthrow of the civilian government.			∐k93 ⊠Other		
1.031	Supplement to the SL Gazette No. 66 - Public	11/12/1997	00007675-	Notice	ICR, Counts 1-11	
	Notice 11, 12, 13, 14 of 1997. Establishing		00007682	X Contextual	(5; 9; 14; 18; 22;	
	personnel changes within the Junta government.			CB	23; 28; 33; 34)	
				R93 Vither		
1.032	The Sierra Leone Gazette No. 43 and No. 49.	14/07/1997	00007701-	Notice	ICR, Counts 1-11	
	Junta personnel postings.	જ	00007702	X Contextual	(5; 9; 14; 18; 22;	
		20/08/1997			23; 28; 33; 34)	
				□R93		
_				Nother		—
1.033	The Sierra Leone Gazette No. 52. Lists the	04/09/1997	00007703-	Notice	ICR, Counts 1-11	
	leaders of the AFRC and their titles, revises the		00007710	S Contextual	(5; 9; 14; 18; 22;	
	Chiefdom Councilors List, lists the Chiefdom		-	CB	23; 28; 33; 34)	
	Committee Members.			LR03		
				Nuther		,

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Ex.#	Title/Description	Date	ERN	Relevance	Indictment
1.040	Trained RUF/AFRC/SLA Child Combatants at Lungi.	undated	00007806- 00007807	Notice SContextual SCB R93 Other	1, (5), 9, (22)
1.041	Report from Sam Bockarie to Charles Taylor dated 24/06/1998 informing him that the Guinean forces, together with ECOMOG, are carrying out cross border attacks in Koidu and Kailahun.	24/06/1998	00007833- 00007833	Notice Contextual CB R93 Other	<i>ICR</i> , Counts 1-11 (5; 9; 14; 18; 22; 23; 28; 33; 34)
1.042	Lists of diamond production at Kono from August 1999 to January 2000.	08/1999 to 01/2000	00007852- 00007862	Notice Contextual CB R93 Other	<i>ICR</i> , Counts 1-11 (5; 9; 14; 18; 22; 23; 28; 33; 34)
1.043	Directive to Captain Ben that Kaya and Yengema should be burnt to ground level.	29/04/1995	00008221	Notice Contextual CB XP3 Other	<i>ICR</i> , Counts 1-11 (5; 9; 14; 18; 22; 23; 28; 33; 34)
1.044	1.044 Directive to Captain Ben and Augustine not to go to Tombodu, because the plan is to capture Bumphe.	06/05/1995	00008224- 00008225	Notice Contextual CB R93 Other	<i>ICR</i> , Counts 1-11 (5; 9; 14; 18; 22; 23; 28; 33; 34)
1.045	Record Book of the Black Guard listing diamonds obtained from mining.	30/10/1998	00008234- 00008250	Notice Contextual CB R93 XOther	<i>ICR</i> , Counts 1-11 (5; 9; 14; 18; 22; 23; 28; 33; 34)

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Ex. #	Title/Description	Date	ERN	Relevance	Indictment
1.046	The State v. Cpl. Foday Saybana Sankoh –	09/1998	00008256-	Notice	1, (5), 2, 3, (9), 7,
	Judgement.		00008438	X Contextual	8 , (18), 9 , (22),
				E CB	10, (23), 11, (28),
				$\mathbb{X}^{\mathbb{R}^3}$	ICR, (33; 34)
				Nother	
1.047	Excerpts from Radio Log Book #2 for the period	28/04/1999	00008636-	Notice	1, (5), 10, (23;
	of 28/04/1999 - 11/09/1999. Particularly, but not	to	00008726	Contextual	27)
	exclusively: 00008696-00008697 [Ordering	11/09/1999		⊠CB	
	Johnny Paul Koroma to wait at his present			R 93	
	location until Foday Sankoh arrives at Kailahun.]			Nother	
	00008642 [Directive from Foday Sankoh to Sam				
	Bockarie to defend Kono and Tongo].				
1.048	1.048 Excerpt from Radio Log Book #3 covering the	14/12/1999	00008764	Notice	ICR, Counts 1-11
	period of 23/09/1999 - 16/04/2000. Radio			Contextual	(5; 9; 14; 18; 22;
	message to the RUF from Sam Bockarie telling				23; 28; 33; 34)
	them he resigns from the RUF.				
				⊠ Uther	
1.049	1.049 Excerpt from Radio Log Book #3 covering the	12/01/2000	00008779	Notice	ICR, Counts 1-11
	period of 23/09/1999 - 16/04/2000. Radio			Contextual	(5; 9; 14; 18; 22;
	message from Ibrahim Bah to Foday Sankoh			E E E	23; 28; 33; 34)
	notifying Sankoh of departure for Monrovia and				
	asking advice on the production.			X Other	
1.050		16/10/1999	00008845-	Notice	1, (5), 11, (28),
	period of 23/09/1999 - 16/04/2000. Radio		00008847	Contextual	ICR, Counts 1-11
	message to Foday Sankoh from Dennis Mingo			CB	(5; 9; 14; 18; 22;
	reporting that there was rampant looting of			$\mathbf{X}^{\mathbf{R93}}$	23; 28; 33; 34)
	civilian properties in Makeni by the brothers			XOther	
	under the command of Moris Kallon.	2			

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Ex.#	Title/Description	Date	ERN	Relevance	Indictment
1.063	Report to Foday Sankoh from Major Francis	31/08/1999	00009765-	□ Notice	ICR, Counts 1-11
	Musa; Subject: Brief Comprehensive Report of		00009768	⊠ Contextual	(5; 9; 14; 18; 22;
	all Salient Activities that took Place in the			CB	23; 28; 33; 34)
	Absence of the Leader from 24 March 1996 - 31			R 93	
	August 1999.			XOther	
1.064		18/06/1997	-69760000	Notice	1, (5), 2, 3, (9), 4,
	Nation delivered on SLBS, 18 June 1997.		00009771	X Contextual	5, 6, (14), 7, 8,
				CB	(18), ICR, (33;
				XR93 XOther	34)
1 065	Minutes of an Emergency Council Meeting of the	16/08/1997	-00009772-	Notice	ICR Counts 1-11
2001	AFRC held at State House		00009775	XContextual	(5: 9: 14: 18: 22:
	August 1997.			CB	23; 28; 33; 34)
)			R93	• •
				⊠ Other	
1.066	The Other War. Steve Coll, a reporter for the	01/01/2000	00010661-	Notice	1, (5; 8), 2, 3,
	Washington Post Magazine, went to RUF		00010676	X Contextual	(13), 4, 5, 6, (17),
	territory and interview Sam Bockarie and Martin			XcB	7, 8, (21), 9, (22),
	Coker.			\boxtimes R93	10, (23), 11, (28),
					<i>ICR</i> , (33; 34)
1.067		01/07/1999	Public		1, (5; 6; 8), 2, 3,
	Murder, Mutilation, Rape, July 1999.		Document	S Contextual	(9; 13), 4 , 5 , 6 ,
					(14; 17), 7 , 8 , (18;
				\boxtimes R93	21), 9, (22), 10,
				Other	(23; 27), 11, (28;
					31), ICR, (33; 34)
1.068	New Testimony of Rape Committed by Sierra	05/06/2000	00010943-	Notice	1, (5), 2, 3, (9), 4,
	Leone Rebels.		00010944	X Contextual	5, 6, (14), 7, 8,
				CB	(18), 10, (23), 11,
				XR93	(28), <i>ICR</i> , (33;
				Other	34)

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Title/Description	Date	ERN	Relevance	Indictment
	24/01/1999	00025503-	Notice	IC.K, Counts 1-11
		10222000	Contextual XCB R93 Other	(5; 9; 14; 18; 22; 23; 28; 33; 34)
1	10/02/2001	00025536-	□ Notice	ICR, Counts 1-11
		10007000		(3, 3, 14, 16, 22, 23; 23; 23; 34)
			Nother Souther	
	12/12/1998	00025706-	Notice	ICR, Counts 1-11
		00025707	X Contextual	(5; 9; 14; 18; 22; 23; 28; 33; 34)
			\square R93 \square Other	
	03/02/2000	00026018-	Notice	1, (5), 11, (28)
		00026020	X Contextual	
			XR93	
	24/05/2001	00026036-	Notice	ICR, Counts 1-11
		00026043	Contextual	(5; 9; 14; 18; 22;
				23; 28; 33; 34)
			⊡R93	
			⊠ Other	
	07/02/2000	00026046-	Notice	1, (5), 11, (28),
		00026047	Contextual	ICR, Counts 1-11
			CB	(5; 9; 14; 18; 22;
			$\mathbf{X}^{\mathbf{R}93}$	23; 28; 33; 34)
			Nother	

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Ex. #	Title/Description	Date	ERN	Relevance	Indictment
1.105	RUF Memo to 2nd Brigade Adjutant from 2nd	22/01/1999	00026072-	Notice	ICR, Counts 1-11
	Brigade G4 Commander.		00026073	Contextual	(5; 9; 14; 18; 22; 23· 28· 33· 34)
				Nother	
1.106	Statement of Col. John Vincent to Sierra Leone	28/12/1999	00027313-	Notice	ICR, Counts 1-11
	People's Army, 2nd Brigade - Kono District.		00027318	⊠Contextual	(5; 9; 14; 18; 22;
				□CB	23; 28; 33; 34)
				R93 ZOther	
1.107	Situation Report from Lt. Gen. Samuel G.	30/09/1994	00028870-	Notice	1, (5), 11, (28),
	Varney at NPFL HQ in Gh		00028871	Contextual	ICR, Counts 1-11
	Taylor, Chairman & C-I-C of NPFL.			□cB	(5; 9; 14; 18; 22;
				⊠R93	23; 28; 33; 34)
				XOther	
1.108	News Article: Journalists Arrested in Sierra	14/06/1999	00028914	Notice	1 , (5), 2 , 3 , (13),
	Leone.			Contextual	ICR (33; 34)
				⊠CB	
				R93	
109	1 109 News Article: Liheria Renortedly Armino	18/06/2000	00028919-	Notice	ICR. Counts 1-11
	Guerrillas.		00028920	Contextual	(5; 9; 14; 18; 22;
				CB	23; 28; 33; 34)
				R93	
				⊠ Other	
110	1.110 Memo from U-52 to U-50 dated 04 Oct. 2000.	04/10/2000	00028767-	Notice	ICR, Counts 1-11
	elects 20 people to escort and protect Charles		00028767	X Contextual	(5; 9; 14; 18; 22;
	Taylor on his trip to Nigeria, Burkina Faso and	- 		CB	23; 28; 33; 34)
	the Gambia on October 6, 2000.				
				XOther	

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Ex.#	Title/Description	Date	ERN	Relevance	Indictment
	Memo from U-	12/04/1999	00029303	□ Notice	ICR, Counts 1-11
	Selects 20 people to escort and protect Charles			⊠ Contextual	(5; 9; 14; 18; 22;
	Taylor on his trip to Libya and South Africa on			CB	23; 28; 33; 34)
	the 15th through the 20th of April, 1999.			□R93	
)			Nother	
1.112	1.112 Burkina Faso ID card.	13/01/1989	00028795-	□ Notice	Consciousness of
			00028796	Contextual	Guilt
				CB	
				R93	
				Other	
1.113	The original fax of Johnny Paul Koroma's letter	01/11/1997	00028799-	□ Notice	ICR, Counts 1-11
	to Charles Taylor dated 1 November, 1997.		00028800	Contextual	(5; 9; 14; 18; 22;
					23; 28; 33; 34)
				R 93	
				Other	
1.114	1.114 Letter from Christian M. Wisseh to Minister	12/06/1998	00028931-	Notice	ICR, Counts 1-11
	Monie R. Captan, MFA/1-3/192/'98. Detailing		00028931	Contextual	(5; 9; 14; 18; 22;
	that the Chairman of the Security Council			CB	23; 28; 33; 34)
	Sanctions committee met with the Liberian		-	R 93	
	ambassador to the UN to tell him that ECOMOG			⊠ Other	
	is reporting Liberians are fighting in Sierra				
	Leone.				

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SAM

re Exhibit List
r – Col
Taylor
<u>Ghankay</u>
Charles
Against
Prosecution

Ex. # Title/Description	Date	ERN	Relevance	Indictment
1.140 Army Takes Over In Freetown	25/05/1997	Picture	Notice	1, (5), 11, (28),
&	to	Monrovia	⊠ Contextual	ICR (33; 34)
With Less Than Two Months To Elections:	26/05/1997	Mission	CB	&
Taylor Confesses, Warns.		Sept 6-12,	\boxtimes R93	ICR, Counts 1-11
		018	Nother	(5; 9; 14; 18; 22;
		00028248		23; 28; 33; 34)
1.141 For SA-Leone Operation: Massive Recruitment	it 03/06/1997	Picture	Notice	ICR, Counts 1-11
in Gbargna.		Monrovia	Contextual	(5; 9; 14; 18; 22;
		Mission		23; 28; 33; 34)
		Sept 6-12,	R 93	
		024	Nother	
		00028254-		
		00028256		
1.142 Taylor Linked to SA. Leone Coup?	29/05/1997	Picture	□ Notice	ICR, Counts 1-11
		Monrovia	Contextual	(5; 9; 14; 18; 22;
		Mission.	CB	23; 28; 33; 34)
		Sept 0-12,	R 93	
		120	⊠ Other	
		00028258		
1.143 As War Rages in Sierra Leone: 300 Liberians	03/06/1998	Picture	Notice	ICR. Counts 1-11
Ambushed.		Monrovia	Contextual	(5; 9; 14; 18; 22;
		Mission		23: 28: 33: 34)
		Sept 6-12,		
		030	Quher	
1.144 Tejan Kabbah Points Finger at AFL.	15/10/1998	Picture	Notice	1, (5), 2, 3, (9).
	ţ	Monrovia		ICR (33. 34)
	20/10/1998	Mission	CB	
		Sept 6-12,	\boxtimes R93	
		031	Other	
		00028261		

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Core Exhibit List
<u>Ghankay Taylor – (</u>
Against Charles Gl
Prosecution Aga

	Title/Description	Date	ERN	Relevance	Indictment
n in	Salute Report to the Leader of the Revolution,	26/09/1999	00009658-	Notice	1, (5), 2, 3, (9),
2	RUF S/L from Major General Sam Bockarie.		00009671	X Contextual	11, (28), <i>ICR</i> ,
				CB Mnor	Counts 1-11 (5;
				⊠ry XOther	9, 14, 18, 22, 23, 28, 33, 34)
	Radio Log Book #4 covering the period of	09/04/2000-	00008078-	□ Notice	1, (5), 10, (23),
\sim	09/04/2000 - 05/05/2000.	05/05/2000	00008109	⊠Contextual [ICR, Counts 1-11
				CB	(5; 9; 14; 18; 22;
				Xr93	23; 28; 33; 34)
				XOther	
~	Mining Units Record Book.	02/08/1999	00012914-	□ Notice	ICR, Counts 1-11
		to	00012927	\boxtimes Contextual	(5; 9; 14; 18; 22;
		11/01/2000		CB	23; 28; 33; 34)
				R93	
				XOther	
	Radio transmissions between Sam Bockarie,	15/10/1999	00008228-	Notice	Counts 1-11 (5;
	Foday Sankoh and Black guards, 15/10/1999-	to	00008232	Contextual	9; 14; 18; 22; 23;
	16/10/1999.	16/10/1999			28; 33; 34)
				□R93 ⊠Other	
	Who is the Judas in ECOMOG? Written by	Unknown at	OTP	Notice	ICR, Counts 1-11
	Hassan Bility.	this time	Currently	Contextual	(5; 9; 14; 18; 22;
			in the	CB	23; 28; 33; 34)
			process of	L R93	
			locating	Nother	
			this article		

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Ex.#	Title/Description	Date	ERN	Relevance	Indictment
1.304	Child Soldiers Global Report. Detailing how	01/05/2001	00010572-	Notice	1, (5), 5, (14), 9,
	child soldiers were abducted, utilized and		00010587	X Contextual	(22), 10 , (23),
	rehabilitated.			XCB	ICR (33; 34)
				Other	
1.305	AFRC-RUF Statement on historic return to	03/10/1999	00013419-	Notice	ICR, Counts 1-11
	Freetown. RUF-AFRC announces that it has		00013421	Contextual	(5; 9; 14; 18; 22;
	returned to Freetown and the war is over. The			CB	23; 28; 33; 34)
	Alliance begs forgiveness for all its wrongs.			R93 XOther	
1.306	Statement of Samuel Randolph Tenga to SLP	11/02/1999	00023311-	Notice	ICR, Counts 1-11
	about young men traveling to Libya to train in		00023322	Contextual	(5; 9; 14; 18; 22;
	the late 1980s.			CB	23; 28; 33; 34)
				CR93	
				XOther	
1.307	List of Radio Operators.	undated	00028940-	Notice	ICR, Counts 1-11
			00028940	Contextual	(5; 9; 14; 18; 22;
				CB	23; 28; 33; 34)
				R 93	
				NOther	
1.308	Unsigned letter to "Your Excellency."	Undated	00029004-	Notice	ICR, Counts 1-11
	Describing that the Excellency still has friends		00029007	Contextual	(5; 9; 14; 18; 22;
	and that his family is ensured safe travels to a			CB	23; 28; 33; 34)
	"country in question." Mentions "parcels" from			□R93	
	Asia and middlemen who are trustworthy.			⊠Other	
1.309	Letter from Kabbah to Charles Taylor written on	19/06/2000	00029023-	Notice	ICR, Counts 1-11
_	State House, RSL stationary. Letter appears to be		00029023	Contextual	(5; 9; 14; 18; 22;
	a cover letter for some reports from the	1		CB	23; 28; 33; 34)
	Washington Post.			L R93	
				N Uther	

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SHIH

Ex. #	Title/Description	Date	ERN	Relevance	Indictment
1.310	Letter from "your son". Letter cautions that the	05/03/2002	00029025-	□ Notice	ICR, Counts 1-11
	Sierra Leoneans are cracking down on the border		00029026	Contextual	(5; 9; 14; 18; 22;
	with external support. Also speaks to Guinea			CB	23; 28; 33; 34)
	base of operations for Liberian insurgency.				
				XOther	
1.311	An agenda list containing the following items:	undated	00029126	Notice	ICR, Counts 1-11
-	"How to bring peace to S. Leone: rearming			Contextual	(5; 9; 14; 18; 22;
	Kamajors poses threat to Liberian Security."			CB	23; 28; 33; 34)
	"Britain was organizing special rescue operation			LR93	
1 212	UI UN IUSIAGES. US DEILIAICITE.	06/05/1000	0003015	Notice	ICR Counts 1-11
210.1	1.312 Internal A1 U Correspondence ironinule U-3 to $C_{1.212} = T_{2.212} = T_{2.212} = T_{2.212}$	6661/00/00	-01262000		75.0.14.18.77
	Charles 1 aylor, Jr. speaking to deproynments and		11767000		(2, 7, 14, 10, 22, 00, 22, 00, 22, 00, 22, 00, 22, 00, 22, 24, 00, 00, 00, 00, 00, 00, 00, 00, 00, 0
	intelligence sources.			CB	23; 28; 33; 34)
				Nother	
1.313	Liberian NSA briefing. "The President's Eye	26/06/1998	00029192-	Notice	ICR, Counts 1-11
	Only" detailing a meeting at the US embassy		00029198	Contextual	(5; 9; 14; 18; 22;
	between Kathlyn List, Mr. Teh Quiah, & Weade			CB	23; 28; 33; 34)
	Kobbah-Wureh where they discussed the plight			R93	
	of former fighters.			⊠0ther	
1.314	Phone Number for Mr. Cisse.	undated	00029328	Notice	ICR, Counts 1-11
				Contextual	(5; 9; 14; 18; 22;
					23; 28; 33; 34)
				Nother	
1.315	Photo of a headless corpse.	06/01/1999	P000065	Notice	1, (5), 2, 3, (13),
				Contextual	
		_		NCB	
				Uther	

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ANNEX 4 Corrected Pages of the Exhibit List (Back-up Exhibit List)

The following pages of the Back-up Exhibit List are set out in this Annex 4:

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Ex.#	Description	Date	ERN	Relevance	Indictment
2.011	Excerpts from Radio Log Book #3 covering the	23/09/1999	00008727-	Notice	ICR, Counts 1-11
	period of 23/09/1999 - 16/04/2000.	to	00008903	Contextual	(5; 9; 14; 18; 22;
	4	16/04/2000		CB CB X Other	23; 28; 33; 34)
2.012	Excerpt from Radio Log Book #3 covering the	05/04/2000	00008817	□ Notice	ICR, Counts 1-11
				X Contextual	(5; 9; 14; 18; 22;
	Message to Foday Sankoh from Major Rashid			CB	23; 28; 33; 34)
	Sandi in Monrovia informing Sankoh that they				
	have made all arrangements toward the traveling of the "two brothers" to your location.			⊠Uther	
2.013	Excerpt from Radio Log Book #3 covering the	20/10/1999	00008851	□ Notice	ICR, Counts 1-11
	period of 23/09/1999 - 16/04/2000. Foday			⊠Contextual →	(5; 9; 14; 18; 22;
	Sankoh orders Sam Bockarie to dispatch certain			CB	23; 28; 33; 34)
	persons to Daru.			∐R93 ⊠Other	
2.014	Report from the Forensic Laboratory for DNA	01/06/2004	00008905-	Notice	Consciousness of
	Research (FLD), Leiden University, together		01680000	Contextual	Guilt
	with a letter from the Netherlands Forensics				
	Institute regarding the "DNA Analysis with the aim to establish the identity of a deceased			Nother	
	person". The tests involved comparison of DNA				
	taken from the body believed to be that of Sam				
	Bockarie with those provided by Sam Bockarie's				
	supposed brother Amadu Bockarie.				
2.015	RUF, Nominal Roll of Soldiers on the Ground,	undated	00009494-	Notice	ICR, Counts 1-11
	Residence of the Leader.		00009495	⊠Contextual	(5; 9; 14; 18; 22;
					23; 28; 33; 34)
				Nother 8	

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Ex.#	Description	Date	ERN	Relevance	Indictment
2.042	RUF plans for a clean sweep operation after	09/02/1999	00025554-	□ Notice	1, (5), 11, (30)
	declaration of peace. Signed by Albert Koroma.		00025555	X Contextual	
				XCB	
				Other	
2.043	RUF Meeting to resolve the dispute between	02/09/2001	00025682-	Notice	ICR, Counts 1-11
	Colonels S.K. Banya and Amara Salia.		00025682	⊠ Contextual	(5; 9; 14; 18; 22;
			A	CB	23; 28; 33; 34)
				□R93	
				XOther	
2.044	Screening of Local Journalist that had reported to	26/01/1999	00025688-		ICR, Counts 1-11
	the Intelligent Unit.		00025689	itextual	(5; 9; 14; 18; 22;
					23; 28; 33; 34)
				R93	
				⊠ Other	
2.045	RUF List of Manpower.	Undated	00025690-	□ Notice	ICR, Counts 1-11
	4		00025699	⊠Contextual →	(5; 9; 14; 18; 22;
					23; 28; 33; 34)
- 1				R 93	
				⊠ Other	
2.046	Photographs taken of killed civilians during the	01/1999	8 Open	□ Notice	1, (5; 8), 2, 3,
	January 1999 Freetown invasion.		Society	⊠Contextual [(13), 7, 8, (21)
			photos +	Xcb	
			P0000066	CR93	
			and	Other	
			P0000067		

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Ex.#	Description	Date	ERN	Relevance	Indictment
2.124	Foday Sankoh in Town? Reports that Sankoh	28/09/1999	Picture	Notice	ICR, Counts 1-11
	came to Liberia at the behest of the Liberian Government.		030	Contextual CB	(5; 9; 14; 18; 22; 23; 28; 33; 34)
			00028212	CR93	
Y C	"Mounito " Othere Ioin Vorome talks continue	30/00/1000	Dicture	Notice	ICR Counts 1-11
7.12	today. Chronicling how Charles Taylor hosted a		039 & 040	Contextual	(5; 9; 14; 18; 22;
	meeting with Sam Bockarie and Johnny Paul				23; 28; 33; 34)
	Koroma and Foday Sankoh.		00028221- 00028222	□R93 ⊠Other	
2.126	An Official Reaction [by the Liberian	22/01/1999	Picture	Notice	ICR, Counts 1-11
	Government] to the Accusation Made on the		Monrovia	Contextual	(5; 9; 14; 18; 22;
	VOA by US State Department Spokesman James		Mission	CB	23; 28; 33; 34)
	Rubin About Liberia's Alleged Support for the		Sept 6-12,		
	RUF In The Sierra Leonean War.		033	XOther	
			00028263		
2.127	In Sierra Leone: ECOMOG Threatens Civilians	04/02/1999	Picture	Notice	ICR, Counts 1-11
	and Taylor Vetos LINA Bill. "President Charles	to	Monrovia	Contextual	(5; 9; 14; 18; 22;
	Taylor has vetoed a bill seeking to grant the	09/02/1999	Mission	B 	23; 28; 33; 34)
	Liberian News Agency an autonomous status."		Sept 6-12,	[R93	
			036	Other	
			00028266		
2.128	The Conakry Accord: 23 October 1997.	23/10/1997	Public	□ Notice	ICR, Counts 1-11
			document	X Contextual	(5; 9; 14; 18; 22;
				CB	23; 28; 33; 34)
				Nother Notes	

Prosecution Against Charles Ghankay Taylor – Back-Up Exhibit List

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<u>Prosecution Against Charles Ghankay Taylor – Back-Up Exhibit List</u>

Ex. #	Description	Date	ERN	Relevance	Indictment
2.183	Radio Logbook, particularly, but not exclusively,	various	00018699-	Notice	ICR, Counts 1-11
	00018895-00018896 [Broadcast message of Dennis Mingo's death in an ambush in Lofa		00019081	Contextual CB PP03	(5; 9; 14; 18; 22; 23; 28; 33; 34)
	County, Liberiaj.			Nother	
2.184	List of names and telephone numbers.	Undated	00029034	Notice	ICR, Counts 1-11
_					23; 28; 33; 34)
				R93 ⊠Other	
2.185	Letter from the Liberian National Security	17/03/1995	00029220-	Notice	ICR, Counts 1-11
	Agency to Taylor outlining security measure inside Liberia during late 1994 and early 1995.		00029222	Contextual CB	(5; 9; 14; 18; 22; 23; 28; 33; 34)
				□R93 ⊠Other	
2.186	Sierra Leone News Archive for 04-05/05/2000.	04-	Public	Notice	ICR, Counts 1-11
	News reports of the UNAMSIL abductions.	05/05/2000	Document	Contextual	(5; 9; 14; 18; 22; 73: 78: 33: 34)
				⊠R93 ⊠Other	
2.187	Liberian Sanctions Committee Annual Report	18/01/2002	Public	Notice	ICR, Counts 1-11
	(S/2002/83). Cover Letter dated 16 Jan. 2002		Document	Contextual	(5; 9; 14; 18; 22;
	from the Chairman of the Security Council			CB	23; 28; 33; 34)
	Committee concerning Liberia addressed to the			E(M)	
				Nuther	
	between 13 and 20 April the Committee provided				
	Liberia with a list of the KUF members it was				
	required to expel.				

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Prosecution Against Charles Ghankay Taylor – Back-Up Exhibit List

L.A. #	Description	Date	ERN	Relevance	Indictment
2.212	Internal Memo titled: Major Differences Between	undated	00028876-	Notice	ICR, Counts 1-11
	the Lome Draft Peace Agreement and Proposal hv RUF Members in Sierra Leone		00028880	Contextual	$(5; 9; 14; 18; 22; 23 \cdot 33 \cdot 33 \cdot 34)$
				R93	· · · · · · · · · · · · · · · · · · ·
2.213	Letter from M. Bartee N. Zweh, Sr. to David	08/04/1997	00028911-	Notice	ICR, Counts 1-11
	Roosevelt Johnson regarding applying for an		00028913	Contextual	(5; 9; 14; 18; 22;
	NGO position and also referring to the			CB	23; 28; 33; 34)
	disbanding of ULIMO and various details regarding ULIMO operations.			∟R93 ⊠Other	
2.214	Letter from President of The Gambia to Charles	18/09/2000	00028921-	□ Notice	ICR, Counts 1-11
	Taylor noting the rapidly deteriorating situation		00028923	Contextual	(5; 9; 14; 18; 22;
	around the Liberian borders with Guinea and			CB	23; 28; 33; 34)
	Sierra Leone and asks that all parties exercise			R 93	
	maximum restraint for the time being.			⊠Other	
2.215	List of seven names.	undated	00029035	□ Notice	ICR, Counts 1-11
				Contextual	(5; 9; 14; 18; 22;
				CB	23; 28; 33; 34)
1		-		XOther	
2.216	Video showing the AFRC/RUF bombarding	undated	EV0035	Notice	1, (5; 6; 8)
	Freetown and Fourah Bay College to push			X Contextual	
	ECUMUG out of Freetown on 6 January 1998.			n N N	
				LR93	
717	Dismonds. Video of a 60 Minutes remort by Bab	Omining	EV/0120		1 (5) 7 6 (10)
117.7	Simon reparding De Beers and conflict	Ougmany aired on	(also	X Contextual	1 , (<i>J</i>), (0 , (10),
	diamonds.	18/02/2001	GC21)	CB	
			~	XR93	
				Other	

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