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SCSL-03-01-T
(23912 - 23927)

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

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

Registrar: Mr. Herman von Hebel

Date filed: 9 January 2009

SPECIAL COURT FOR SIERRA LEONE	
RECEIVED	
COURT MANAGEMENT	
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TIME	15:40 HRS

THE PROSECUTOR

Against

Charles Ghankay Taylor

Case No. SCSL-03-01-T

PUBLIC

PROSECUTION REPLY TO DEFENCE RESPONSE TO PROSECUTION MOTION FOR ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Office of the Prosecutor:

Ms. Brenda J. Hollis
Ms. Kathryn Howarth

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Mr. Courtenay Griffiths Q.C.
Mr. Andrew Cayley
Mr. Terry Munyard
Mr. Morris Anyah

I. INTRODUCTION

1. The Prosecution files this Reply to the “Public Defence Response to Prosecution Motion for Admission of Documents of BBC Radio Broadcasts”.¹

II. REPLY

Applicable Legal Principles

2. In its Response, the Defence incorporates by reference arguments contained in separate filings regarding the legal principles to be applied to the admission of documents.² The Prosecution has filed replies to the separate filings addressing those arguments.³ Accordingly, the Prosecution relies on and incorporates by reference its submissions made therein.
3. The Prosecution emphasizes, though, that the matter at issue is the ability of the Parties to bring relevant evidence before this Chamber. The Defence arguments contained in the Response are fundamentally flawed as they ignore the fact that two rules are used at the ICTY and ICTR for the introduction of evidence other than through live testimony – Rules 89 and 92bis.⁴ These rules are used in tandem. Nonetheless, the Defence seeks to impose on the SCSL the interpretation and use made by the ICTY and ICTR of Rule 92bis without also extending to the SCSL these tribunals’ interpretation and use of Rule 89(C).

Admission under Rules 89(C) & 92bis

Acts and conduct of the Accused

4. In paragraph 4 of the Response, the Defence claims that the documents “in many instances talk directly about the Accused and his involvement in or knowledge of the Sierra Leonean conflict”. The Defence contends that “it would be highly prejudicial for the Documents to be admitted into evidence without a witness who could speak to their contents”.⁵ The Prosecution has acknowledged at paragraph 7 of the Motion and in the

¹ *Prosecutor v. Taylor*, SCSL-03-01-T-695, “Public Defence Response to Prosecution Motion for Admission of Documents of BBC Radio Broadcasts,” 5 January 2008 (“**Response**”).

² Response, para. 3.

³ *Prosecutor v. Taylor*, SCSL-03-01-T-670, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents of the United Nations and United Nations Bodies,” 17 November 2008 (“**UN Documents Reply**”).

⁴ In the context of the current issue, Rules 92ter and 92quater are not relevant and so are not discussed.

⁵ Response, para. 5.

Annex that certain of the documents do contain evidence which might be considered acts and conduct of the Accused as defined and limited by the jurisprudence. However, as addressed in paragraphs 6 and 7 below, that fact does not dictate that the documents are inadmissible in the absence of a witness.

Evidence going to a critical element of the Prosecution case

5. At paragraphs 6 through 7 of the Response, the Defence claims that the documents contain evidence that is material to actions of subordinates and which goes to a “critical element” of the Prosecution’s case and is therefore proximate to the accused. The Defence argues that this evidence should not be admitted without giving the Defence an opportunity for cross-examination. The Prosecution has replied to this argument in the context of a similar reply and, therefore, relies on and incorporates by reference its submissions made therein at paragraphs 5 – 8.⁶

Documents may be tendered absent a witness

6. The Defence argument that a witness is required to speak to the contents and relevance of the Documents is without merit.⁷ The Prosecution has replied to this argument in the context of a similar reply and, therefore, relies on and incorporates by reference its submissions made therein at paragraph 5, substituting any reference therein to “RUF Documents” with a reference to “Documents of BBC Radio Broadcast”.⁸ The parties will have every opportunity to address the significance of the documents and the weight that should be afforded to them and the Trial Chamber is perfectly able to determine the significance and weight, based on the content of the documents themselves in the context of all the evidence in the case and based on the parties’ submissions.

Probative value of the documents is not substantially outweighed by their prejudicial effect

7. The bases for exclusion identified by the Defence in paragraph 11 of the Response are without merit. The Defence repeats the argument made in another similar response.⁹ Therefore, the Prosecution relies on and incorporates by reference its submissions made

⁶ *Prosecutor v. Taylor*, SCSL-03-01-T-701, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents of Certain Intergovernmental Organizations & of Certain Governments”, 5 January 2009 (“**IGO Documents Reply**”).

⁷ Response, paras. 3, 8-10.

⁸ *Prosecutor v. Taylor*, SCSL-03-01-T-680, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents Seized from RUF Office, Kono District”, 1 December 2008 (“**RUF Documents Reply**”).

⁹ See para. 17 of *Prosecutor v. Taylor*, SCSL-03-01-T-677, “Public Defence Response to Prosecution Motion for Admission of Documents Seized from RUF Office, Kono District,” 24 November 2008.

in reply thereto at paragraph 10.¹⁰

8. Further, the Defence opposes admissibility on the basis of unreliability.¹¹ The Defence again fails to appreciate that the test for admissibility of evidence under Rule 89(C) is relevance only. The test for admissibility under Rule 92*bis* is not that a document is reliable, rather only that the document be susceptible of confirmation. Issues of reliability and probativity are properly considered by the SCSL Trial Chamber at the end of the trial “as evidence is admissible once it is shown to be relevant: the question of its reliability is determined thereafter and is not a condition for its admission”.¹²

Admission under Rule 89(C)

9. As noted in previous submissions, the exclusionary conditions set out in the *Kordić* and *Čerkez* Decision are legally and factually irrelevant to the matters at issue and should not be applied to the admission of the instant Documents. In relation to the application of this ICTY case to the current proceedings, the Prosecution refers the Chamber to its previous submissions.¹³
10. The Defence contends that “all 29 documents in the BBC Material were produced and were in the public domain before the case commenced and were available to Prosecution when it presented its case. Therefore they should now be excluded”.¹⁴ This argument seems to be premised on the mistaken belief that the Prosecution has finished presenting its case. This patently is not the case.
11. The Defence objection that the documents are not sufficiently significant¹⁵ runs contrary to their arguments at paragraphs 6 through 7 of the Response that the documents are by their very nature “critical and proximate.” Setting aside the inherent inconsistency of the Defence approach, the significance of the Documents is stated in the Annex to the Motion. Even assuming, *arguendo*, the evidence is not individually significant, as noted

¹⁰ RUF Documents Reply, para. 10.

¹¹ Response, paras. 12 – 13.

¹² *Prosecutor v. Norman et al.*, SCSL-04-14-T, “Fofana – Appeal against Decision Refusing Bail”, 11 March 2005, para. 26 (“**Fofana Bail Appeals Decision**”).

¹³ See UN Documents Reply, para. 7 and 8 and *Prosecutor v. Taylor*, SCSL-03-01-T-676, “Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents Seized from Foday Sankoh’s House,” 24 November 2008, para. 13, in response to Response, para 14 and Annex to the Response.

¹⁴ Response, para 17.

¹⁵ Response, para. 18.

by the Appeal Chamber in the *Fofana* Bail Appeals Decision,¹⁶ the fact that isolated items of evidence have “some relevance means that they must be available for counsel to weave into argument and for the Judge to have before him in deciding what to make of the overall factual matrix.”¹⁷

12. The Defence also argues that the documents are outside the scope of the Indictment and therefore should be excluded.¹⁸ The Prosecution relies upon arguments presented in previous replies to similar motions and reiterates that such evidence is clearly relevant and admissible.¹⁹
13. Further, the Defence contends that all of the documents in the BBC Material, except 1, 3, 8, 17, 28 and 29 are “cumulative” and therefore should be excluded.²⁰ Yet the exclusion of documents that repeat evidence already adduced at trial, as the Defence suggests, is unimaginable. The evidentiary concepts of corroboration and confirmation of evidence rely in part on consistency of evidence from more than one source. In addition, exclusion of evidence is only considered where it is **unduly** cumulative and so risks inappropriately prolonging the trial. This is not a relevant consideration in this instance.
14. The Defence also argues that “all of the transcripts in the BBC Material, except 16, 17, 19 and 27 are based on anonymous or hearsay sources, which are incapable of being tested in cross examination and should therefore should be excluded.”²¹ This Chamber has noted that it “has a discretion under Rule 89(C) to admit any relevant evidence” and “the inability of the Defence to cross-examine such witnesses is a matter that goes to the weight of the evidence, not its admissibility”.²² There is no rule excluding hearsay evidence. Such evidence is clearly relevant and admissible.²³ The Prosecution relies upon

¹⁶ *Prosecutor v. Norman et al.*, SCSL 04-14-T, “Fofana – Appeal against Decision Refusing Bail,” 11 March 2005 (“**Fofana Bail Appeals Decision**”).

¹⁷ *Fofana* Bail Appeals Decision, para. 23.

¹⁸ Response, para. 18.

¹⁹ UN Documents Reply, para. 14; *Prosecutor v. Taylor*, SCSL-03-01-T-696, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Newspaper Articles Obtained from the Catholic Justice And Peace Commission Archive in Monrovia, Liberia,” 12 December 2008 (“**JPC Documents Reply**”), paras. 6, 7.

²⁰ Response, para. 19.

²¹ Response, para. 20; Response, Annex.

²² *Prosecutor v. Taylor*, SCSL-03-01-T-650, “Prosecution Motion for Admission of Documents of the United Nations and United Nations Bodies,” 29 October 2008 (“**UN Documents Motion**”), para 21, referring to *Prosecutor v Taylor*, SCSL-03-01-T-543, “Decision on Defence Application to Exclude the Evidence of Proposed Expert Witness, Corrine Dufka, or in the alternative, to Limit its Scope And on Urgent Prosecution Request for Decision”, 19 June 2008, para 25, in relation to Defence objections regarding the admission of witness testimonies collected by Ms Dufka.

²³ See UN Documents Motion, para 21.

arguments presented in previous replies to similar motions.²⁴

15. The Defence reliance on the Decision in *Prosecutor v. Milutinovic* is as misplaced and irrelevant to the issues herein as its reliance on *Kordic and Cerkez* Decision, discussed in paragraph 9 above.²⁵ The Defence refers to the Trial Chamber's refusal in *Milutinovic* to admit maps into evidence in circumstances where the Trial Chamber found that "the volume of maps offered" would "only serve to flood the Chamber with repetitive information" and was "cumulative with insufficient probative value".²⁶ As explained above, the documents cannot be regarded as unduly cumulative and the requirement of probative value is not applicable to the test of admissibility before the SCSL.

BBC Materials under tab 16

16. In the Annex to the Response, the Defence notes that D0000514/ 08.01.99 (Track 2) has already been admitted under P-85B. The Prosecution observes that this is the case and withdraws the request for submission of these materials.

III. CONCLUSION

17. For the reasons set out in the Motion and above, the Prosecution requests that the Trial Chamber admit into evidence the Documents identified in Annex A and provided in Annex B of the Motion pursuant to: (i) Rule 89(C); or in the alternative, (ii) Rules 89(C) and 92*bis* (Rule 92*bis* being interpreted as set out in paragraphs 15-16 of the UN Documents Motion).

The Prosecution further requests that the arguments contained in the Response be dismissed.

²⁴ UN Documents Reply, paras. 18,19; JPC Documents Reply, paras. 8, 9.

²⁵ Response, para 15, referring to *Prosecutor v. Milutinovic* et al, No. IT-05-87-T, Decision on Prosecution Motion to Admit Documentary Evidence, 10 October 2006 ("*Milutinovic*"). The Prosecution observe that the date of this Decision was incorrectly cited in the table of the authorities as the 20 October 2006.

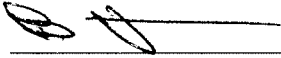
²⁶ Response, para 15 footnote 17 and *Milutinovic*, paragraphs 23 and 24.

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Filed in The Hague,

9 January 2009

For the Prosecution,



Brenda J. Hollis
Principal Trial Attorney

LIST OF AUTHORITIES

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

Prosecutor v. Taylor, SCSL-03-01-PT-241, “Prosecution Motion for Admission of Material Pursuant to Rules 92*bis* and 89C,” 17 May 2007.

Prosecutor v. Taylor, SCSL-03-01-T-369, “Decision on Prosecution’s Motion for Admission of Material Pursuant to Rules 89(C) and 92*bis*,” 7 December 2007.

Prosecutor v. Taylor, SCSL-03-01-T-650, “Prosecution Motion for Admission of Documents of the United Nations and United Nations Bodies,” 29 October 2008.

Prosecutor v. Taylor, SCSL-03-01-T-669, “Prosecution Reply to Defence Response to Prosecution Motion for Admission of Extracts of the Report of the Truth and Reconciliation Commission of Sierra Leone,” 17 November 2008.

Prosecutor v. Taylor, SCSL-03-01-T-670, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents of the United Nations and United Nations Bodies,” 17 November 2008.

Prosecutor v. Taylor, SCSL-03-01-T-676, “Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents Seized from Foday Sankoh’s House,” 24 November 2008.

Prosecutor v. Taylor, SCSL-03-01-T-677, “Public Defence Response to Prosecution Motion for Admission of Documents Seized from RUF Office, Kono District,” 24 November 2008.

Prosecutor v. Taylor, SCSL-03-01-T-680, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents Seized from RUF Office, Kono District,” 1 December 2008.

Prosecutor v. Taylor, SCSL-03-01-T-698, “Motion for Admission of BBC Radio Broadcast”, 12 December 2008.

Prosecutor v. Taylor, SCSL-03-01-T-695, “Public Defence Response to Prosecution Motion for Admission of Documents of Certain Intergovernmental Organisations & of Certain Governments,” 12 December 2008.

Prosecutor v. Taylor, SCSL-03-01-T-696, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Newspaper Articles Obtained from the Catholic Justice and Peace Commission Archive in Monrovia, Liberia,” 12 December 2008.

Prosecutor v. Taylor, SCSL-03-01-T-701, “Public Prosecution Reply to Defence Response to Prosecution Motion for Admission of Documents of Certain Intergovernmental Organizations & of Certain Governments”, 5 January 2009.

Prosecutor v. Norman et al., SCSL 04-14-T

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

Prosecutor v. Norman et al., SCSL 04-14-T, “Fofana – Appeal against Decision Refusing Bail,” 11 March 2005.

Prosecutor v. Sesay et al., SCSL-04-15-T

Prosecutor v. Sesay et al., SCSL-04-15-T-1049, “Decision on Defence Application for the Admission of the Witness Statement of DIS-192 under Rule 92*bis* or, in the alternative, under Rule 92*ter*,” 12 March 2008.

ICTY Cases

Prosecutor v. Kordić and Čerkez, IT-95-14/2, “Decision on Prosecutor’s Submissions concerning “Zagreb Exhibits” and Presidential Transcripts,” 1 December 2000.
<http://www.un.org/icty/kordic/trialc/decision-e/01211AE514285.htm>

Prosecutor v. Milutinović et al., IT-05-87-T, “Decision on Prosecution Motion to Admit Documentary Evidence”, 10 October 2006.

Prosecutor v. Galić, IT-98-29-AR73.2, Decision on Interlocutory Appeal Concerning Rule 92*bis* (C), 7 June 2002.

(Copy provided in previous filing - see Prosecutor v. Taylor, SCSL-03-01-T-510, “Public Prosecution Motion for Admission of Document Pursuant to Rule 89(C)”, 19 May 2008)

ICTR Cases

Prosecutor v. Karemera, Case No. ICTR-98-44-AR73(C), Decision on Prosecutor’s Interlocutory Appeal of Decision on Judicial Notice, Appeals Chamber, 16 June 2006.
<http://69.94.11.53/ENGLISH/cases/Karemera/decisions/160606.htm>

Prosecutor v. Bagosora et al., ICTR-98-41-T, “Decision on Prosecutor’s Motion for the Admission of Written Witness Statements Under Rule 92*bis*,” 9 March 2004.
<http://69.94.11.53/ENGLISH/cases/Bagosora/decisions/040309.htm>

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
1. D0000533 / 15.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (outside scope of Indictment) • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See para. 14 of Reply.
2. D0000510 / 20.12.98	<ul style="list-style-type: none"> • Not sufficiently significant <ul style="list-style-type: none"> ○ Relates to crime-based evidence ○ Fighting between the government forces and the AFRC/RUF for control of Koidu ○ ECOMOG efforts to limit civilian casualties • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
3. D0000509 / 21.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence, outside scope of Indictment) • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See para. 14 of Reply.
4. D0000524 / 22.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
5. D0000523 / 22.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay • Unclear how forest guard was an "eyewitness" to what was mentioned in the report (YELLOW TAB) 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply. • There is no assertion in the submitted segment itself that the forest guard was an eyewitness. The Defence's reference to a yellow tab is unclear.
6. D0000523 / 23.12.98	<ul style="list-style-type: none"> • Not sufficiently significant <ul style="list-style-type: none"> ○ Relates to crime-based evidence ○ Outside scope of Indictment ○ Attacks by rebels close to Magburaka and Makeni – people fleeing • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
7. D0000525 / 24.12.98	<ul style="list-style-type: none"> • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 13, 15 of Reply. • See para. 14 of Reply.
8. D0000537 / 27.12.98	<ul style="list-style-type: none"> • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 14 of Reply.

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
9. D0000550 / 30.12.98 (Track 1)	<ul style="list-style-type: none"> • Not sufficiently significant (outside scope of Indictment) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
10. D0000550 / 30.12.98 (Track 2)	<ul style="list-style-type: none"> • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 13, 15 of Reply. • See para. 14 of Reply.
11. D0000549 / 30.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence, outside scope of Indictment) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
12. D0000539 / 31.12.98	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
13. D0000528 / 04.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
14. D0000528 / 04.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
15. D0000513 / 07.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
16. D0000514 / 08.01.99 (Track 2)	<ul style="list-style-type: none"> • Already produced / admitted • Cumulative 	<ul style="list-style-type: none"> • See para. 16 of Reply.
17. D0000554 / 08.01.99	<ul style="list-style-type: none"> • Not sufficiently significant <ul style="list-style-type: none"> ○ Relates to crime-based evidence ○ Reports sporadic explosions and gunfire in Freetown by the rebels despite the ceasefire 	<ul style="list-style-type: none"> • See para. 11 of Reply.
18. D0000555 / 10.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
19. D0000515 / 11.01.99 (Track 1)	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply.
20. D0000515 / 11.01.99 (Track 2)	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
21. D0000516 / 12.01.99 (Track 2)	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
22. D0000522 / 16.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
23. D0000542 / 18.01.99 (Track 2)	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.

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REPLY TO OBJECTIONS RE. ADMISSION OF DOCUMENTS OF BBC RADIO BROADCASTS

Title/Description	Defence Objections	Prosecution's Reply
24. D0000542 / 18.01.99 (Track 1)	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
25. D0000507 / 22.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence, reports of burning and amputations in Freetown) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
26. D0000508 / 23.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Cumulative • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See paras. 13, 15 of Reply. • See para. 14 of Reply.
27. D0000519 / 26.01.99	<ul style="list-style-type: none"> • Cumulative 	<ul style="list-style-type: none"> • See paras. 13, 15 of Reply.
28. D0000532 / 28.01.99	<ul style="list-style-type: none"> • Not sufficiently significant (relates to crime-based evidence) • Anonymous / hearsay 	<ul style="list-style-type: none"> • See para. 11 of Reply. • See para. 14 of Reply.
29. D0000545 / 01.02.99	<ul style="list-style-type: none"> • Not sufficiently significant (outside scope of Indictment) • Anonymous / hearsay 	<ul style="list-style-type: none"> • See paras. 11, 12 of Reply. • See para. 14 of Reply.

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