



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 10 JANUARY 2008
9.00 A.M
TRIAL

TRIAL CHAMBER II

Before the Judges:

Justice Julia Sebutinde, Presiding
Justice Teresa Doherty
Justice Richard Lussick
Justice Al Hadji Malick Sow, Alternate

For Chambers:

Mr Simon Meisenberg
Ms Doreen Kiggundu

For the Registry:

Ms Rosette Muzigo-Morrison
Ms Rachel Irura
Mr Vincent Tishakwa

For the Prosecution:

Ms Brenda J Hollis
Mr Stephen Rapp
Mr Alain Werner
Ms Maja Dimitrova

**For the accused Charles Ghankay
Taylor:**

Mr Courtenay Griffiths QC
Mr Terry Munyard
Mr Andrew Cayley

1 Wednesday, 10 January 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.02 a.m.]

09:01:18 5 PRESIDING JUDGE: Good morning. I see there is a little
6 difference in the appearances, so I will ask the parties to
7 introduce themselves, please.

8 MS HOLLIS: Thank you, Madam President. Good morning, your
9 Honours. For the Prosecution today, the Prosecutor Stephen Rapp,
09:01:37 10 Brenda J Hollis, Alain Werner and Maja Dimitrova.

11 PRESIDING JUDGE: Mr Griffiths?

12 MR GRIFFITHS: I'm sorry, your Honour, for turning my back
13 on the Court, but I assumed because it was the same membership of
14 our team as yesterday - but I appear, Mr Courtenay Griffiths,
09:02:09 15 along with Mr Terry Munyard and Mr Andrew Cayley.

16 PRESIDING JUDGE: Thank you, Mr Griffiths. The case comes
17 up for continuation of the Prosecution case. We don't see the
18 witness. Ms Hollis, what is happening?

19 MS HOLLIS: I have no idea about that, your Honour. I
09:02:27 20 haven't been told anything about the witness not being here.

21 PRESIDING JUDGE: Court Management, where is the witness
22 this morning?

23 MS MUZIGO-MORRISON: Good morning, your Honour. The
24 Registry would like to apologise for a slight delay in the
09:02:45 25 arrival of the witness that has been occasioned by a conflict of
26 scheduled travel with the bringing in of the ICC detainee. The
27 roads have been blocked off and the WVS was unable to reach the
28 building, but the witness should be here in the next five minutes
29 or so, because I have been informed that the witness has now

1 entered the building. Thank you.

2 [The witness entered court]

3 PRESIDING JUDGE: I'm glad that the witness is here now and
4 we will just allow him some time to compose himself. Good

09:04:00 5 morning, Mr Witness.

6 THE WITNESS: Good morning.

7 PRESIDING JUDGE: I just want to remind you we're going to
8 continue with your testimony this morning and to remind you that
9 you're still under oath to tell the truth.

09:04:15 10 THE WITNESS: Yes.

11 WITNESS: TF1-406 [On former oath]

12 EXAMINATION-IN-CHIEF BY MS HOLLIS: [Continued]

13 Q. Good morning, Mr Witness.

14 A. Good morning.

09:04:28 15 Q. Mr Witness, when we concluded your testimony yesterday you
16 were talking to the judges about a problem between Sam Bockarie
17 and Issa Sesay and you testified that Charles Taylor invited them
18 to Monrovia to discuss this and you testified that the dispute
19 was discussed and it was finalised that Sam Bockarie was now

09:05:10 20 changed and Issa Sesay became the new commander. Now when you
21 testified yesterday that it was finalised that Sam Bockarie was
22 now changed and Issa Sesay became the new commander who finalised
23 that arrangement?

24 A. Mr Taylor supervised into finalising - solving the problem
09:05:56 25 between the RUF leadership.

26 Q. And what exactly did Mr Taylor do to finalise that problem?

27 A. The confusion that erupted within the RUF forces, that was
28 the reason why he sent for them and then he discussed with them
29 and then now he said that the former leader Mosquito was changed

1 and Issa became the leader, Issa Sesay.

2 Q. Now after this decision was made that the leadership was
3 changed do you know what Sam Bockarie did after that?

4 A. Sam Bockarie was now instructed to move from the RUF
09:06:43 5 territory to come back to Liberia. He came back to Liberia with
6 all of his soldiers, about 350 men. We used some of the - some
7 of the SSS went to get the men and also the helicopter.

8 THE INTERPRETER: Your Honours, please could the witness
9 come back.

09:07:05 10 PRESIDING JUDGE: Mr Witness, let me just request you, as I
11 did yesterday, to talk a little slower because the interpreter
12 can't keep up with you. So can you please repeat what you just
13 said like two sentences behind.

14 MS HOLLIS:

09:07:18 15 Q. And to assist you, Mr Witness, you were talking about the
16 helicopter. Would you recommence from there?

17 A. I said the helicopter was used and the SS vehicles were
18 also used, the helicopter was used to airlift some of the men
19 from Foya to Monrovia and now they were sent to Gbatala base for
09:07:47 20 training.

21 Q. Now you said that Sam Bockarie was now instructed to move
22 from the RUF territory to come back to Liberia. Who gave him
23 that instruction?

24 A. Mr Taylor gave him the instruction.

09:08:05 25 Q. And when you spoke of a helicopter that was used, what
26 helicopter was this?

27 A. Anti-terrorist, they had two helicopters, ATUs. The
28 helicopter belonged to Mr Taylor.

29 Q. Now did Sam Bockarie now move from RUF territory to

1 Liberia?

2 A. Yes, he was in Liberia for some time and then later we
3 couldn't see him again. The only information we heard was that
4 he went to Burkina Faso.

09:08:52 5 Q. Now when you were talking about Charles Taylor inviting
6 these people to Monrovia to resolve the dispute you said there
7 was a place close to the Nigerian embassy that was particularly
8 for RUF members?

9 A. Yes, that was what we called the RUF guesthouse. That
09:09:21 10 building was especially prepared for them. We had two people
11 assigned in there, one was Memuna and the other fellow was - I
12 have now forgotten his name, but two people were assigned to that
13 guesthouse. Both of them were RUF members.

14 Q. Now you said that the building was especially prepared for
09:09:50 15 them. Who ordered that that - who prepared that building for
16 them?

17 A. Mr Taylor prepared the building for them.

18 Q. Now also yesterday in your testimony you testified that
19 during the time you were bringing arms and ammunition from Lofa
09:10:18 20 County to Monrovia you travelled with Charles Taylor to Guinea
21 and you testified that you were at a meeting attended by
22 Charles Taylor, Ahmad Tejan Kabbah and Lansana Conteh, the
23 President of Guinea. You also testified that these individuals
24 discussed non-aggression to fellow countries. What do you mean
09:11:00 25 when you say they discussed non-aggression to fellow countries?

26 A. I meant that none of either of the Mano River member
27 country should support any war against another country within
28 that union.

29 Q. Now, sir, do you yourself know what countries belonged to

1 the Mano River?

2 A. I was referring to Sierra Leone, Liberia and Guinea.

3 Q. Now if you remember do you recall any statements by
4 Charles Taylor regarding non-aggression in Sierra Leone?

09:11:53 5 A. He said he had no idea about what was happening in Sierra
6 Leone and that he had not supported any fighting men to use
7 Liberia to embarrass or to attack Sierra Leone and he said he
8 would not support that kind of thing.

9 Q. Now yesterday you also spoke of an incident at an airport
09:12:23 10 in Monrovia and I believe you said that was James Spring field
11 and you testified that you were given an instruction to go to
12 this airport and receive an AFRC delegation from Freetown. Now
13 were you told what type of aircraft this delegation would be
14 travelling on?

09:12:50 15 A. We were told that a member of the AFRC from Johnny Paul
16 Koroma, Koroma's government, was travelling with the helicopter
17 from Freetown to James Spring airfield in Monrovia and that I
18 should go and receive them.

19 Q. And, sir, you also testified that you went there and ECOMOG
09:13:15 20 surrounded the whole area?

21 A. Yes.

22 Q. When you say ECOMOG surrounded the whole area what do you
23 mean?

24 A. ECOMOG denied us receiving the people. They took total
09:13:35 25 control of the area. That was what I meant.

26 Q. And when you were there were you able to observe what
27 happened with this delegation?

28 A. No, we were not given chance to even go close to the
29 helicopter by ECOMOG.

1 Q. Now you also testified yesterday about fighting in
2 September in Monrovia involving Roosevelt Johnson. Would you
3 tell the Court who you're referring to when you said Roosevelt
4 Johnson?

09:14:16 5 A. Roosevelt Johnson was the leader of the ULIMO-J. He had a
6 problem with the government. He entered the country and the
7 security couldn't identify the border through which he entered
8 and he - they did not know how he entered the country, so he was
9 invited by Mr President at the Executive Mansion and then he
09:14:50 10 denied going there and he said he would not report to anybody and
11 so the police were instructed to arrest him and so that is why
12 fighting broke out in Monrovia.

13 PRESIDING JUDGE: Ms Hollis, I wish to interrupt.

14 Mr Interpreter, did you say he denied going there or he refused
09:15:11 15 to go there? It doesn't make sense. The interpretation doesn't
16 make sense.

17 THE INTERPRETER: Your Honours, could the witness come back
18 to that area.

19 PRESIDING JUDGE: Mr Witness, what was it that you said
09:15:20 20 about Mr Roosevelt going to State House?

21 THE WITNESS: I said he refused his call, that he was not
22 going to the Executive Mansion, that he was not going to report
23 to anybody.

24 MS HOLLIS:

09:15:38 25 Q. Mr Witness, yesterday you also testified that you took Abu
26 Keita to a meeting at the house of Benjamin Yeaten and you
27 testified that at that meeting Dopoe Menkerzon was present and
28 you said that he was a Special Forces and a four star general.
29 Again, your Honours, I believe the spelling of that is D-0-P-0-E

1 M-E-N-K-E-R-Z-O-N. Now when you said he was a four star general
2 what did you mean, what was his position?

3 A. He was holding position in the NPFL time, but in the
4 government he had no position, but he was still called a four
09:16:42 5 star general.

6 Q. Now you also testified about performing monitoring duties
7 in relation to the movement of arms and ammunition in Lofa County
8 and you testified that you travelled once to Foya. You testified
9 earlier yesterday that your home where you originated from was in
09:17:08 10 Voinjama. Now during this time you were performing these
11 monitoring duties did you also travel to Voinjama?

12 A. Yes, I was --

13 Q. And could you tell us what if anything you observed about
14 the movement of arms and ammunition and people when you went to
09:17:37 15 Voinjama?

16 A. I did observe the former fighters of ULIMOs still having
17 hidden arms and some of them were taking them to Sam Bockarie to
18 the RUF territory in Sierra Leone and also Sam Bockarie sent
19 Superman, one of his senior commander at that time, he also
09:18:08 20 travelled to Voinjama and the surrounding Voinjama areas to buy
21 arms and ammunition to take it to Sierra Leone.

22 Q. Now during this time you were performing these monitoring
23 duties how many trips did you make to Voinjama?

24 A. I made about more than seven trips or more than two or --

09:18:34 25 THE INTERPRETER: Your Honours, can the witness please go
26 over that again.

27 PRESIDING JUDGE: Mr Witness, please repeat what you just
28 said.

29 MS HOLLIS:

1 Q. How many trips did you make to Voinjama during this time?

2 A. Three times.

3 Q. And did you observe this type of behaviour each time?

09:19:06

4 A. The one I explained just now was the only thing I observed,
5 that the RUF members were now patrolling the whole of Lofa
6 County, buying arms and ammunition and taking them to Sierra
7 Leone.

09:19:30

8 Q. Now you also talked yesterday about a shipment to RIA. You
9 testified that you saw Sam Bockarie and others meeting at a
10 restaurant near Roberts International Airfield and that they were
11 discussing how or who would receive parts of the arms shipment
12 that was coming in. You testified that the arms shipment was
13 taken to White Flower and you followed behind the police
14 director. Now do you know how many vehicles were loaded with

09:19:55

15 arms and ammunition from this shipment?

09:20:24

16 A. After every one or two months, Paul Molrbah was receiving
17 arms and ammunition at the Roberts International Airport. That
18 did not happen once. It happened more than three to four times.
19 Up to 2003 arms and ammunition were still coming down at
20 Robertsfield and Paul Molrbah was there receiving them.

21 Q. Now you said this happened up until 2003. In what year did
22 this begin to happen where this gentleman received arms and
23 ammunition three to four times, during what years, when did that
24 start?

09:20:51

25 A. It stopped in 2003 at the time Mr Taylor left power,
26 because the last time that came was blasted in the air at
27 Robertsfield.

28 Q. I'm sorry, perhaps my question was not understood by the
29 interpreter. During what year did these shipments begin?

1 A. You mean the time they started bringing them or the time
2 they stopped bringing them?

3 Q. The time they started bringing them?

4 A. I started experiencing it since 2001 and it went up to
09:21:46 5 2003, if my memory serves me well. I realised that arms and
6 ammunition were coming to Roberts International Airfield and it
7 started in 2001 up to 2003.

8 Q. Now yesterday you testified that this meeting where Sam
9 Bockarie was at Roberts International Airport and you received
09:22:14 10 this arms shipment, you testified that this was before the attack
11 on Freetown in January 1999. Is that correct?

12 A. Sam Bockarie, I didn't see him receiving the arms. I said
13 Sam Bockarie was at the Robertsfield and they were discussing
14 which logistics - how much logistics each person was supposed to
09:22:46 15 receive. But Paul Molrbah - that all of these arms, they would
16 take them first to White Flower and everybody will only receive
17 from Mr Taylor himself. That is what I said yesterday.

18 Q. And yesterday you testified that this was before the attack
19 on Freetown in January 1999. Is that correct?

09:23:14 20 A. When I started getting to know about Sam Bockarie coming to
21 Monrovia. Is that what you mean?

22 Q. No, we are talking about the meeting in the restaurant near
23 Roberts International Airport, the meeting you just referred to.
24 Sam Bockarie is there, they are discussing how they are going to
09:23:35 25 divide up arms and ammunition. That meeting. Then you testified
26 that the shipment came in and it was taken to White Flower. That
27 meeting at the restaurant near Roberts International Airport,
28 that is what I'm asking you about. Did that occur before the
29 attack on Freetown in January 1999?

1 A. That happened before the attack happened in 1991 when I saw
2 Sam Bockarie at the restaurant at Roberts International Airport.
3 It happened before 1999, before the attack in Freetown.

09:24:20 4 Q. Thank you, Mr Witness. Now yesterday you also testified
5 about an ECOWAS meeting in Lome, Togo in mid 1999 and you
6 testified that at that meeting President Kabbah raised up a
7 little girl whose arm had been amputated. Now at this time in
8 the meeting can you tell us who was present when President Kabbah
9 lifted up this little girl with the amputated arm?

09:24:49 10 A. The 15 members of the ECOWAS Leaders were present.

11 Q. And do you recall the names of any of those leaders who
12 were present?

13 A. No. All the ECOWAS Leaders were present. That's all I
14 know.

09:25:07 15 Q. Now at the time President Kabbah lifted up this little girl
16 with her amputated arm where was Charles Taylor?

17 A. President Taylor was present there.

18 Q. Mr Witness, yesterday you also testified about a man named
19 Roland Duoh and you testified that during the period of time we
09:25:32 20 were discussing, and that was 2001 and 2002, he was the commander
21 of the navy division. You also said he was the security director
22 of OTC. Could you tell the Court, please, what was OTC?

23 A. OTC was a logging company. I don't know. Oriental logging
24 company at Buchanan. I don't know how to pronounce that OTC
09:26:09 25 properly, but it was a logging company.

26 Q. And did you know who was the owner or had the logging
27 rights for OTC?

28 A. I only two persons I know, Mr Taylor and Gus.

29 Q. Do you know Gus's last name?

1 A. No.

2 Q. You also testified that Roland Duoh was the security
3 director of Hotel Africa. What was Hotel Africa?

4 A. Hotel Africa is in Monrovia.

09:26:49 5 Q. And do you know who owned Hotel Africa at the time Roland
6 Duoh was the security director there?

7 A. Gus was supervising the hotel at that time. Gus.

8 Q. What do you mean when you say that Hotel Africa was a
9 government area?

09:27:24 10 A. It was a government owned hotel, in 1979 where they had the
11 OAU meeting.

12 Q. Now you talked yesterday about the attacks by the LURD
13 against Liberia and you discussed those attacks as beginning in
14 1999. Now at the end of 1999 what happened to you?

09:27:57 15 A. When LURD started attacking, at that time Mr Taylor
16 suspended me. I was sent to the police central for six months in
17 jail.

18 Q. And do you know why that happened?

19 A. The information that was given to him was that I had hands
09:28:24 20 in the attack and ordered people who were coming to attack
21 Liberia, I heard an information about them and that I was
22 supporting them. Those were, according to them, the intelligence
23 informations that came out against me. So he sent the police to
24 arrest me.

09:28:43 25 Q. And you said that you were held in jail for six months?

26 A. Yes.

27 Q. And then in 2001 you became the deputy chief of staff for
28 the army division?

29 A. Yes, from the jail straight I was promoted as the deputy

1 chief of staff and also being issued arm and ammunition to go and
2 to fight at the battle front.

3 Q. Now yesterday you told the Court about several militias,
4 the army division, navy division, marine division and artillery
09:29:25 5 division, and you gave the Court information about the Wild Geese
6 unit and the ATU unit. Now earlier in your testimony you had
7 said that Strike force was also a militia. Could you tell us
8 what Strike force was?

9 A. Strike force was one of the division assigned in Nimba
09:29:49 10 County. The chief of staff of Strike force was Adolphus Dolo.

11 Q. And do you know what positions Adolphus Dolo had held
12 before he became chief of staff for Strike force?

13 A. Adolphus Dolo was one of the junior commandos for NPFL that
14 I know about him and now he was working in the house.

09:30:16 15 Q. What do you mean he was working in the house?

16 A. He is now - he is now one of the representative for Nimba
17 County in the house right now.

18 Q. You mean now, today?

19 A. Now, now.

09:30:35 20 PRESIDING JUDGE: Is that junior commando or junior
21 commander?

22 MS HOLLIS: Your Honour, junior commando.

23 THE WITNESS: Junior commando.

24 MS HOLLIS: Your Honour, it was A-D-O-L-P-H-U-S D-O-L-O.

09:31:00 25 Q. Now who did the commander of the Strike force report to?

26 A. He reported to Benjamin Yeaten.

27 Q. And at this time in 2001, 2002 what was Benjamin Yeaten's
28 position?

29 A. Benjamin's position was that he was the SSS director and

1 also he was the joint chief of staff and he was also the
2 supervisor for all the various divisions.

3 Q. And by divisions you mean these militias you have talked
4 about?

09:31:47 5 A. Yes, all the militia were being supervised by him, Yeaten.

6 Q. And in this capacity who did Benjamin Yeaten report to?

7 A. Benjamin Yeaten reported to Mr Taylor.

8 Q. Now at this time what was Benjamin Yeaten's rank?

9 A. Four star general.

09:32:13 10 Q. And were there any individuals who had higher rank than
11 Benjamin Yeaten?

12 A. No, nobody that I could recall, except Mr Taylor who had a
13 five star general rank.

14 Q. Now at this time that he was, I believe you said, joint
09:32:41 15 chief of staff, where was he based?

16 A. At last he was based at Lofa. That was where he was.

17 Q. And you're speaking of Lofa County?

18 A. Yes.

19 Q. Now the army division chief of staff, to whom did the army
09:33:06 20 division chief of staff report?

21 A. He reported to Benjamin Yeaten and sometimes he will report
22 directly to Mr Taylor.

23 Q. And the navy division commander, to whom did he report?

24 A. All the division chief of staffs had to report to Benjamin
09:33:29 25 Yeaten or they reported to Mr Taylor directly at that time.

26 Q. Now you mentioned the Wild Geese unit. The commander of
27 that unit, to whom did that commander report?

28 A. He reported to Benjamin Yeaten.

29 Q. And you also mentioned ATU. To whom did the commander of

1 ATU report?

2 A. He reported to Mr Taylor directly.

3 Q. Now you have told us that Benjamin Yeaten was the joint
4 chief of staff and during this time period we're talking about he
09:34:11 5 was based in Lofa County. Could you tell us what other
6 commanders were in Lofa County at that time?

7 A. I said the navy division was in Foya, the marine division
8 was in Foya, and we had the terrorist in Zorzor and we had a
9 Strike force based in Nimba County and we had the army division
09:34:46 10 at Tubmanburg, that is Bomi Hills. We had the acting terrorist
11 at Gbatala. That is in Bong County. Then we had White Geese
12 also in Gbarnga.

13 Q. Thank you, Mr Witness. Now you also testified yesterday
14 that the RUF were invited to assist the militias against the
09:35:14 15 LURD. Did the RUF come to assist in the fight against the LURD?

16 A. Yes.

17 Q. And where did they operate, in what area?

18 A. They operated in Foya, Kolahun and Voinjama.

19 Q. Do you recall the names of any of the RUF commanders?

09:35:39 20 A. The only person that I could recall his name, when Abu
21 Keita came to Voinjama he sent me a written message that he's in
22 good hands and that now he has been just sent forth to assist the
23 Liberian government to fight against the LURD.

24 Q. Now to your knowledge who did the RUF report to?

09:36:06 25 A. RUF at that time when they came into Liberian territory to
26 help the government they were reporting to Benjamin Yeaten
27 directly.

28 Q. Now if you know during this time the RUF were in Liberia
29 assisting in the fight against of the LURD who gave the arms and

1 ammunition that they used, who gave them the arms and ammunition?

09:36:49 2 A. Mr Taylor will give the guns to Benjamin Yeaten and
3 Benjamin Yeaten in return will distribute the guns and
4 ammunitions between the RUF and all the other fighting groups in
5 Lofa County.

6 Q. Now while the RUF were fighting in Lofa County do you
7 recall where any wounded RUF were taken for treatment?

8 A. Yes. Some of the wounded RUF fighters were taken to JFK in
9 Monrovia, in the hospital. And now at that time the press people
09:37:20 10 visited the hospital and some other politicians visited the area
11 and they said on the radio and in the newspaper that the war in
12 Liberia is not true because they are seeing some other citizens
13 from other countries like from Sierra Leone in the hospital and
14 they were accusing the government that they were taking their
09:37:45 15 Liberian - sending them to Sierra Leone to fight there and now
16 the people they see in the hospitals are speaking Krio, so some
17 people were arrested for that reason. So some people were sent
18 to the battle front to prove actually whether there was war in
19 Liberia or not. That was what happened.

09:38:06 20 Q. Now you said some people were arrested for that reason.
21 What do you mean?

22 A. I mean especially the lady who handled the last election
23 that gained the power, the elections commission. They sent
24 people to the battle front to prove actually whether there was
09:38:27 25 war in Liberia because when they visited the hospital they saw
26 Sierra Leonean people. That means there is no war in Liberia,
27 the war is in Sierra Leone and then Mr Taylor is taking Liberians
28 to go and fight war in Sierra Leone. So they were arrested for
29 that reason. Paul Molrbah arrested people, some of the

1 politicians, including the last electoral commissioner because
2 they sent people to the battle front to prove that reason.

3 Q. Are you saying these people were arrested because they were
4 saying that Liberians were being sent to Sierra Leone?

09:39:08 5 A. Yes, they said they didn't believe whether there was any
6 war in Liberia because they visited the hospital and have seen
7 the Sierra Leonean fighters all over in the hospital.

8 Q. Now when you were the deputy chief of staff and then acting
9 chief of staff of the army division would you tell us again from
09:39:30 10 whom you received instruction and direction?

11 A. I took instruction from Benjamin Yeaten and sometimes
12 Mr Taylor would call me on the direct phone on which he gave me a
13 satellite phone on which he will call me and he will call me
14 directly and he will issue arm and ammunition to me.

09:39:53 15 Q. And can you recall how often Charles Taylor would contact
16 you directly with instruction or directions?

17 A. Many times. I can't recall. It is many times. Because
18 almost every two or three days he will call me, he wanted to know
19 the situation at the battle front.

09:40:19 20 Q. Now to your knowledge the chiefs of staff of these other
21 divisions, from whom did they receive their instructions or
22 directions?

23 A. The same instruction that I received, they also received
24 the same instruction. Sometimes they received the instruction
09:40:42 25 from Benjamin Yeaten, sometimes they received their instruction
26 from Mr Taylor directly, because they were all issued phones
27 because so he could call the person directly.

28 Q. Now during this time that you were deputy chief of staff
29 and then acting chief of staff for the army division were you

1 involved in any meetings where Charles Taylor was present?

2 A. Yes.

3 Q. How many meetings?

09:41:24

4 A. When he his home town was attacked, Arthington, very close
5 to the city, he invited all of the chiefs of staff at his
6 residence. At that time with Arthington was attacked he called
7 us all so that we could plan how to push the enemy out and we
8 were all in that meeting together with the marine chief of staff
9 and he was arrested, he was asked to be put in jail because he
10 was pushed out of his own territory by the other fighters. So
11 those were the meetings we had.

09:41:50

12 MS HOLLIS: Your Honours, I believe that the spelling of
13 that town is A-R-T-H-I-N-G-T-O-N.

09:42:19

14 PRESIDING JUDGE: Ms Hollis, I'm not quite sure that I
15 understood who was arrested.

16 MS HOLLIS: That's what I'm going to clarify now, your
17 Honour.

09:42:35

18 Q. Now you indicated that at this meeting or at some time
19 around this meeting that the marine chief of staff was at the
20 meeting and you said he was arrested. Now who was arrested?

09:43:04

21 A. The marine chief of staff Fasu was arrested. He said he
22 allowed himself to be pushed out of his own control area, the
23 territory where he was fighting, that was the front line, the
24 enemies pushed him out of there, therefore he was put in jail.
25 Also in the meeting my own boss also after the meeting was put
26 under house arrest because he stated that, "Oh, this war, if we
27 cannot execute it then we should forget about it." For that
28 remarks he was also put under house arrest.

29 Q. When you said your boss who are you talking about?

1 A. Joseph Montgomery.

2 Q. Who was it who arrested Fasu?

3 A. Benjamin Yeaten. Fasu put into jail at the BTC.

4 Q. And who arrested your boss?

09:43:43 5 A. The instruction came from Mr Taylor to Benjamin Yeaten that
6 Joseph Montgomery should be under house arrest.

7 Q. You said that Fasu was put into jail at the BTC. What is
8 that?

9 A. Battle Training Centre. That was the barracks in the
09:44:09 10 centre of town. Battle Training Centre.

11 Q. In the centre of what town?

12 A. Central Monrovia.

13 Q. Now during this time that you were deputy chief of staff
14 and acting chief of staff did you have meetings with other chiefs
09:44:33 15 of staff or deputy chiefs of staff?

16 A. The chiefs of staff would not call meetings among
17 themselves except Mr Taylor call for a meeting or Benjamin Yeaten
18 deemed it necessary. But you cannot - you cannot call all the
19 chiefs of staff to a meeting except if former President Taylor at
09:45:02 20 that time will send for Benjamin Yeaten and he will visit you at
21 your territory then you would have one or two discussions, but
22 nobody had the power to call all the chiefs of staff in a
23 meeting, no, that never happened, except Mr Taylor who had that
24 power.

09:45:20 25 Q. And to your recollection how many times did Charles Taylor
26 and Benjamin Yeaten visit you at your territory?

27 A. Mr Taylor never visited anybody in his territory. Benjamin
28 Yeaten always represented Mr Taylor to visit territories.

29 Q. Now during the time you were with the army division how

1 often would you have meetings with Benjamin Yeaten?

2 A. Benjamin Yeaten only visited me three times at the front
3 line, but for all the meetings he will call and tell you that a
4 meeting will be held at Mr Taylor's place, then he would pass on
09:46:19 5 the information and we would go there.

6 Q. And you mentioned one meeting that you had when
7 Charles Taylor was present. Do you recall other meetings that
8 you had when Benjamin Yeaten would call you and tell you to come
9 for a meeting with Mr Taylor?

09:46:36 10 A. We had another meeting at Mr Taylor's residence when Daniel
11 Chea himself was at that meeting when Mr Taylor himself said that
12 he had to leave because he had an international - he had
13 internationals with him.

14 Q. Now you said there was a meeting that --

09:47:11 15 A. The international community was on his back.

16 PRESIDING JUDGE: Ms Hollis, I think you had better go over
17 that. We're not quite sure what is on the record.

18 MS HOLLIS: Yes, your Honour, I will.

19 Q. You said that at this meeting a person by the name of
09:47:31 20 Daniel Chea was present. Your Honours, that would be D-A-N-I-E-L
21 C-H-E-A. Who was Daniel Chea?

22 A. Defence Minister.

23 Q. And, if you know, Daniel Chea, the Defence Minister, did he
24 have a military rank?

09:47:54 25 A. Daniel Chea was a brigadier general.

26 Q. Now before you were talking about a four star general, a
27 five star general. A brigadier general is how many stars?

28 A. A brigadier general is one star. Major general is two
29 stars. Lieutenant general is three stars. Joint chief of star,

1 that's the general chief of staff, is four stars.

2 Q. Now if we can go back to clarify your testimony you said
3 that there was a meeting, that Daniel Chea was at this meeting
4 and you said that Charles Taylor called the meeting and can you
09:48:43 5 tell us again why he called that meeting?

6 A. He said that he wanted to quit the presidency, that he was
7 going to Nigeria because if he didn't leave it would be a problem
8 for the country because he was referring - the big people were
9 after him, like he was referring to America and Great Britain,
09:49:11 10 that these people were on his back and the international - there
11 was international conspiracy against him, so he had to go and
12 that was our last meeting that we had with him.

13 Q. Now during the fighting against the LURD, the time period
14 you talked about, 2001/2002, who was in charge of bringing arms
09:49:34 15 and ammunition to Lofa County?

16 A. Mr Taylor was in charge of the arms and ammunitions. He
17 issued to - he issued ammunitions sometimes to Benjamin Yeaten to
18 take it to this division or that division. At times he would do
19 it directly, the army chief of staff, or he would give them to
09:50:12 20 me. All the arms and ammunition that I received myself, I
21 received those from Mr Taylor himself. I would come to see him,
22 at times he will give instructions to the people at the white
23 house or he gave instructions. At times I would call, take them
24 to my house. I would not have to take all of that to the battle
09:50:34 25 front because there are too many, too many. Some I would take at
26 my house, some of I would pack at my house. What I was supposed
27 to take to the front line, I will take them to the front line.

28 PRESIDING JUDGE: Mr Witness, we're having difficulties
29 understanding what the interpreter is saying and I think part of

1 the problem is you're speaking too quickly or too fast. Can you
2 please speak slower than you would normally speak so that the
3 interpreter can catch up and with you, and, Mr Interpreter, do
4 make an effort to be understood, please. We're having
09:51:07 5 difficulties understanding what you're saying.

6 MS HOLLIS:

7 Q. And again if we could think about just giving a few
8 sentences and then having a pause, perhaps that would assist.
9 Now you mentioned that he will give instructions and at times I
09:51:23 10 would call, take them to my house and you talked about people at
11 the white house. Now when you said he would give instructions
12 who were you talking about?

13 A. The people who were manning the area at the white house.
14 That were some of the SS offices who were used as special
09:51:54 15 attendants. That included Butler and other people who worked
16 with him in the house. Those who were the people he would give
17 instructions, he will say give this amount of ammunitions to this
18 person or that person.

19 Q. And if I could stop you there, please. When you say that
09:52:15 20 those were the people he would give instructions, who would give
21 instructions to these people?

22 A. Mr Taylor.

23 Q. And when you talk about white house, what are you referring
24 to? What is the white house?

09:52:33 25 A. His residence. Mr Taylor's residence at Kongo Town. That
26 is what we called white house.

27 Q. And do you know if it's known by any other name?

28 A. That is the house. That is the only name for it. We
29 called it white house. That was the place he was residing. He

1 resided there. From there he went to the office and come back.
2 That was his residence. The name of the area, we used to call it
3 white house.

4 Q. Now you said --

09:53:14 5 A. White Flower, I mean. White Flower. That is the correct
6 name, White Flower.

7 Q. Now how would these arms and ammunition actually be taken
8 to the fighters in Lofa County?

9 A. The chief of staff will come for your ammunition at White
09:53:42 10 Flower. You will instruct - some time Benjamin Yeaten would take
11 it to you or sometimes he will call you, or because all the
12 chiefs of staff and the deputy chiefs of staff on the phone, that
13 he would talk to you directly.

14 Q. Now you said that there were several divisions operating in
09:54:07 15 Lofa County, so how would the arms and ammunition be transported
16 from Charles Taylor's house to Lofa County?

17 A. I repeat, I said sometimes Benjamin Yeaten would take them
18 to you the division's chief of staff. Or Mr Taylor will call you
19 directly to White Flower, to his house, and give you the
09:54:42 20 ammunition and then you will take it for yourself because you -
21 you are supposed to be having control over of your own ammunition
22 and that is how to go and distribute or divide it amongst your
23 men. Have you got it clear now?

24 Q. Let me try to make my question more clear. Once the people
09:55:02 25 arrived at White Flower and were given the arms and ammunition
26 how did they transport the arms and ammunition to Lofa County?
27 By what means?

28 A. Each of the chief - each of the chief of staff had not less
29 than three cars. Mr Taylor gave each of the divisions either

1 three cars or four cars. Those were Toyota Land Cruiser jeeps,
2 open back sleeper jeeps and some even had trucks where they can
3 transport their ammunition.

09:55:53 4 Q. So one of the ways they would take it it would be to drive
5 it to Lofa County, is that correct, in their vehicles?

6 A. Yes, in the vehicles. Sometimes they will use the
7 anti-terrorist helicopter to drop it to you and sometimes they
8 may make another plane at Springfield that will transport -
9 Roland Duoh himself would transport the ammunition from James
09:56:18 10 Springfield to Foya.

11 Q. Okay, now let's stop for a moment. Now you said that they
12 would use the anti-terrorist helicopter to drop it to you. Now
13 you testified earlier that the anti-terrorist unit had two
14 helicopters, is that correct?

09:56:38 15 A. Yes, they had two helicopters, camouflage and fatigue
16 colour.

17 Q. When you say camouflage, can you tell the Court what you
18 mean by camouflage?

19 A. That is army colour.

09:56:57 20 Q. Is camouflage a solid colour or broken colour?

21 A. A green colour and a mixed up colour. That is the green,
22 black and grey.

23 Q. And then also I believe you said army colour. What is
24 that? Or fatigue colour, what is that?

09:57:18 25 A. Fatigue colour is the green.

26 Q. And that is a solid uniform?

27 A. Yes.

28 Q. Now these helicopters, who flew these helicopters?

29 A. They had the Ukraine and South Africans.

1 Q. And you said that these helicopters belonged to the ATU.
2 Who had overall command or control of these helicopters?

3 A. Mr Taylor had the control over the helicopters and he sent
4 for it.

09:58:07 5 Q. And below Mr Taylor who had control over these helicopters?

6 A. Benjamin Yeaten, Momoh Jibba, Chucky Taylor.

7 Q. Now you testified that these helicopters were used to fly
8 arms and ammunition to Lofa County. In what locations or towns
9 in Lofa County would they fly?

09:58:35 10 A. Foya, Kolahun, Voinjama and Zorzor.

11 Q. And do you yourself know what quantity or how much arms and
12 ammunition could be carried in those helicopters?

13 A. No, I can only remember my own supply that I used to
14 receive. Sometimes I used to get not less than 250 bags of AK-47
09:59:10 15 round or get more than 50 RPG bomb and a muzzle and also one at a
16 time I would receive 300 arms for army division.

17 Q. And when you say you received, did you say 300 arms, what
18 kind of arms?

19 A. AK-47.

09:59:38 20 Q. And if you could just tell the Court, you talked about
21 sometimes you would receive from these helicopters not less than
22 250 bags of AK-47 rounds. How big would be a bag of AK-47
23 rounds? How many rounds would be in a bag, if you know?

24 A. The army division was now receiving nothing from the
10:00:07 25 helicopter. I myself would personally take my vehicle and drive
26 to Monrovia to White Flower to Mr Taylor's house and I would
27 receive the arms and ammunition. And when it is too much I will
28 haul it to my house, because I was living right across the road
29 on the other side of Mr Taylor's house, that was my residence in

1 Kongo Town. So I would haul everything to my house and what I
2 wanted taken to the front line, I would take a very small number
3 and I would take to the front line. Because if you take the
4 ammunition to the front line and anything went wrong, anything
10:00:47 5 happened to it, you will be court-martialed.

6 Q. So I can understand this clearly, this 250 bags of AK-47
7 rounds you received, you transported those bags in vehicles; is
8 that correct?

9 A. Yes.

10:01:01 10 Q. And the same with the 50 RPG bombs?

11 A. Yes.

12 Q. And to go back to my question, could you tell the Court how
13 many rounds of ammunition would be in a bag, if you know?

14 A. It's difficult to say because the bags, sometimes they gave
10:01:25 15 instruction if you received it in a bag they will tell you that
16 you have to remove them from the bag because for those particular
17 bags people are behind on their bags, they want to know where
18 they are getting their ammunition from, then you will just remove
19 everything from the bag and then sometimes you put the bags
10:01:47 20 together and then lit fire on them then you burn them down.

21 Then sometimes at the White Flower we would just collect
22 all the ammunitions and then they remove them from the original
23 bags and put them into rice bags and then they would burn those
24 other bags because they never had wanted those bags to be exposed
10:02:07 25 to the outside people because those were the bags I'm speaking
26 about, the bags that they brought the things in.

27 Q. If I could stop you for a moment, please, do you know why
28 they did not want to the bags to be exposed to the outside
29 people?

1 A. The reason was because we had arm embargo and the people
2 were finding to know where the arms and ammunitions were coming
3 from and if the bag was exposed then they would get to know the
4 country that was sending them to us and then if they got to know
10:02:45 5 where they were coming from it was going to be a problem. So we
6 would always take them out of the bags, then put the bags
7 together to and burn them. Or sometimes before we arrive at the
8 White Flower we realise that they had already removed them from
9 the original bags, then they would put them into empty rice bags
10:03:06 10 and then they would burn the other original bags.

11 Q. If you could stop there for just a moment. You said that
12 they never wanted those bags to be exposed to the outside people.
13 When you say they, who do you mean?

14 A. Mr Taylor was saying that before - the people he is giving
10:03:32 15 the instructions to, that they should distribute the ammunitions
16 to the commanders at his house. They said Mr Taylor said he gave
17 instruction to them that they would always tell you who is coming
18 for the ammunitions to bring empty bags so that you can put the
19 ammunitions in because they would always burn the original bags.

10:03:55 20 Q. Now earlier you said that we would burn the bags. Were you
21 involved in burning these bags?

22 A. Most often if it was emergency situation you would have to
23 take them from there, because to stay at the White Flower and
24 unload the bags there, it would be sometimes a delay and it would
10:04:23 25 be a problem. So you would have to look for a nearby bush
26 wherein you would unload all the bags and transfer them into
27 other bags. That was how we operated.

28 Q. Now these bags that you were involved in burning these
29 bags, what writing if any did you see on these bags?

1 A. Sometimes you see Chinese writings on it, then sometimes
2 you see Arab writing.

3 Q. Now let's go back if we can to this transport of arms and
4 ammunition by road. If the witness please could be shown MFI-1
10:05:07 5 which is the tab 26 map of the routes. Now this map has
6 different colour routes marked. Could you explain to the Court
7 each of these coloured routes beginning with green, please?

8 THE INTERPRETER: Your Honours, could the witness speak
9 into the mic, please.

10:06:01 10 PRESIDING JUDGE: Mr Witness, please start again because
11 your microphone was off.

12 MS HOLLIS: And could you raise the exhibit so we can see
13 where he is starting from. It's not showing up on my screen at
14 least. Raise it more. No, so that Monrovia shows on there,
10:06:24 15 please, the beginning of the route.

16 THE WITNESS: Okay, okay.

17 MS HOLLIS:

18 Q. Now would you tell us, please, about the green route?

19 A. The green road is the major road in the country from
10:06:39 20 Monrovia, to Careysburg, to Kakata, to Salala, to Gbatala to
21 Gbarnga. From Gbarnga you will use - this Belefana is not on
22 the main road, this Belefana you see. You go to Salayea, you go
23 to Zorzor. Also this Fassama is not on the main road. From
24 Zorzor you get to Voinjama. From Voinjama you get to Kolahun.
10:07:16 25 From Kolahun sometimes you use the route because there is a
26 junction after Kolahun. There is another route just behind
27 Kolahun to go towards Vahun.

28 Q. Let's not speak about the yellow route. So the green route
29 went to Foya City and from Foya City to where?

1 A. From Foya City you get to Mendekoma. Here is Mendekoma,
2 Bullo, on the Koindu border.

3 Q. Now can you tell the Court what types of vehicles would use
4 this main route?

10:07:55 5 A. This main route was being used by smaller car and big car
6 because it was a major road, from here to Gbarnga it's coal tar.
7 From Gbarnga to the rest of the area, a dusty road, you can use
8 smaller car or you can use big vehicle.

9 Q. And you said that to Gbarnga it is a coal tar road. Is
10:08:23 10 that what you said?

11 A. Yes, from Monrovia to Gbarnga it's coal tar.

12 Q. Now earlier you testified that some of the divisions had
13 trucks. Could you tell us what size trucks did they have?

14 A. Big trucks with six tyres, six tyre truck, that's what I
10:08:49 15 mean. The Taiwanese gave some trucks to Mr Taylor and he
16 distributed it among the army, some division had - marine
17 division had some, had the truck, they were using that truck up
18 to Voinjama.

19 Q. These trucks you describe as six tyre trucks, big trucks
10:09:14 20 with six tyres, what route would they follow?

21 A. They follow the green route.

22 Q. Now there is also a route on there that is in yellow and
23 you began to talk about that earlier. Can you tell us about the
24 yellow route?

10:09:31 25 A. Yes. This is another road from Monrovia, you get to Klay,
26 from Klay you get to Tubmanburg, from Tubmanburg you get to
27 Gbarma, from Gbarma you go to Lofa Bridge, Lofa Bridge you go to
28 Jenne Mana. That is Jenne Mana. From Jenne Mana, the SLC camp
29 is not on the main road, that is why it's not written here. You

1 go to Kongbor. From Kongbor you get to ULC, United Logging
2 Company, ULC. From there you go to Vahun.

3 Q. Now when was this yellow route used?

4 A. This yellow road is also being used to transport
10:10:33 5 ammunition. Sometimes they say they will go to the navy and also
6 some of the time the RUF will also patrol all over there and
7 leading to the logging company area and look for - because from
8 Bomaru they go across direct to Vahun and then they go to ULC and
9 then they go to SLC camp. I met them there two different times.

10:11:01 10 Q. Let's stop you there for a moment. You said that the RUF
11 will patrol all over there. What do you mean?

12 A. They will cross from Sierra Leone side, from Baiwala to
13 Bomaru. From Bomaru they will get to Vahun, they will go to ULC
14 and they will also get to SLC camp to get fuel. Most times they
10:11:26 15 went there to get fuel.

16 Q. When they would cross over from Sierra Leone do you know
17 why they were coming into Liberia?

18 A. This time we're talking about they were also operating in
19 Foya, Kolahun, Voinjama areas, so they had the right to go any
10:11:51 20 part of the Monrovia area, all that place is Lofa.

21 Q. Now you said that they would go to a camp you called SLC
22 camp. What is SLC camp?

23 A. That was a logging company, but I actually don't know the
24 meaning of ULC. I only knew that was called United Logging
10:12:16 25 Company ULC.

26 Q. Now you talk about a ULC, is that different from SLC?

27 A. Yes, it's different. Those were two different companies.

28 Q. And you said the RUF would go to ULC as well. Why would
29 they go to ULC, if you know?

1 A. You needed to pass through ULC before you get to SLC
2 because when you move from ULC you go to Kongbor, then from there
3 you will be able to get to SLC area, if you are coming from the
4 Vahun end.

10:12:55 5 Q. Now this yellow route that you have shown, what type of
6 vehicles, what size vehicles would take that route?

7 A. Four wheel drive.

8 Q. And what size? You talked about big trucks. Would big
9 trucks take that route?

10:13:15 10 A. In the dry season time the big trucks can use that road,
11 but in the rainy season time you have to use the four wheel
12 pick-ups.

13 Q. Now there is also a red route there and another that
14 appears to be a wine colour or a variation of red. Were those
10:13:33 15 both routes that were used to take weapons?

16 A. Yes.

17 Q. And why would those routes be used as opposed to the green
18 route?

19 A. When the war was intensifying the LURD - when the war was
10:13:57 20 intensifying the LURD were setting ambush at these different
21 places so you would use the road from Monrovia via Klay, to
22 Tubmanburg, you go into Bopolu, you try to get to Fassama because
23 this area was not on the main road. When you get to Fassama
24 there is another road that you can use to get to around Salala
10:14:31 25 area. You can use another area also with civilians to put the
26 ammunition on their heads forcibly, then to use them you were
27 able to get to Voinjama and Kolahun area. This is the other
28 route.

29 Q. Now you said that you would use civilians to carry

1 ammunition on their heads. Can you tell us about that?

2 A. That means that you don't plead with them. When you get to
3 any town you just ask the town chief that how many people do you
4 have here. You call them together, you give him instruction just
10:15:20 5 to call his people together so they will take the arms and
6 ammunition for us to go. That was the instruction.

7 Q. And who did that, who took these civilians and had them go
8 with arms and ammunition?

9 A. The chief of staff will use that power because you had the
10:15:39 10 mandate that you should do anything that you can to see that the
11 ammunition reaches its destination.

12 Q. Now was this something that the chiefs of staff did on
13 their own initiative or did they receive an instruction about
14 this?

10:16:02 15 A. You receive the instruction, not you - you will not
16 yourself --

17 THE INTERPRETER: Your Honours, could the witness slow
18 down, please.

19 PRESIDING JUDGE: Mr Witness, can you start again, please.

10:16:20 20 MS HOLLIS:

21 Q. Speak slowly, please. Just slow down?

22 A. I said you get the instruction from Mr Taylor that this
23 ammunition, don't use this particular road, there will be an
24 ambush on that road, so use the forest road. And knowing the
10:16:41 25 fact that those particular roads, not all the areas that the
26 vehicle will pass through, so he will say use the people in the
27 individual villages on the routes to carry the ammunition for
28 you. So anywhere you will be able to stop with a vehicle you the
29 chief of staff will stop there and then you give the instruction

1 to the junior commandos so that when they get to villages they
2 ask the town chiefs to give their people so that they will tote
3 the ammunition to the destination.

10:17:20 4 Q. If you know what would be the weight of a load that a
5 civilian would carry?

6 A. Too heavy. It is too heavy. That is iron. It is heavy.
7 Very heavy.

8 Q. And if you know how far would these civilians be forced to
9 carry these loads?

10:17:40 10 A. The road I just talked about is deep forest. Sometimes
11 from Bopolu to get to Fassama area it would be a two day's walk.
12 You will walk in the day and you will walk in the night. From
13 Fassama area to get to the area called Kolahun here, that is one
14 day and a half walk in the forest.

10:18:14 15 Q. Thank you, Mr Witness. Now yesterday when you testified
16 you said that at some point Benjamin Yeaten gave an instruction
17 to Sam Bockarie to attack Guinea from Sierra Leone. Now how do
18 you know that Benjamin Yeaten gave that instruction to Sam
19 Bockarie?

10:18:39 20 A. When I took Abu Keita to Benjamin Yeaten's house I was
21 actually not invited to attend the meeting, but I went there and
22 I stood there for a while and I had wanted to make sure that Abu
23 Keita was in good hands and that was with Sam Bockarie. And when
24 they were discussing Benjamin Yeaten said that Sam Bockarie
10:19:06 25 should put some people together also from Sierra Leone to attack
26 Guinea. I overheard that.

27 Q. Now do you know if that attack was carried out?

28 A. That attack was carried out.

29 Q. Now in addition to that attack where the RUF attacked

1 Guinea from Sierra Leone are you aware of any other attacks
2 against the LURD outside of Liberia?

3 A. They also - when they came into the Foya, Kolahun, Voinjama
4 areas, they also used that end to cross to Gueckedou and to
10:19:52 5 attack RUF. This was also the same instruction from Benjamin
6 Yeaten.

7 Q. Now what I have here is you said that they also used that
8 end to cross to Guinea to attack the RUF?

9 A. No, you didn't get me clear. I said when the RUF came to
10:20:19 10 Liberia to assist the Charles Taylor militia forces against the
11 LURDs they also crossed over to Guinea to attack. Both RUF and
12 the various militia that were fighting for Mr Taylor, they all
13 crossed over to Guinea to attack Guinea. The RUF were also
14 involved in that. They were crossing from the Liberian side into
10:20:47 15 Guinea and when they were in Sierra Leone they also used Sierra
16 Leone. The same instruction was carried out. They used Sierra
17 Leone also to cross over to attack Guinea and after all when they
18 came back upon the same instruction to assist in Liberia, that
19 was when they came back to Liberia, they received the same
10:21:08 20 instruction to use Liberia to attack Guinea also. Have you got
21 it clear?

22 Q. I think I do, thank you very much. Now I would like to
23 turn the focus - well, before I do that let me ask you when the
24 RUF were involved in these attacks in Guinea who was the overall
10:21:32 25 commander for these attacks?

26 A. I do not know who was the overall commander. The person
27 who was giving me this information from was Abu Keita. He was
28 one of our commanders that crossed from Foya to attack Guinea
29 upon Benjamin Yeaten's instruction.

1 Q. Thank you. Now I would like to change the focus a bit and
2 I would like to ask you if you know some names and the first name
3 I would like to ask you about is a person called Salami. Did you
4 know such a person?

10:22:28 5 A. Yes. Salami was one of the RUF that went to Liberia to
6 assist the militias and now he, Benjamin Yeaten took him and made
7 him a senior bodyguard commander.

8 Q. And did you know a person named Mustapha Jallow?

9 A. Mustapha Jallow was one of the Special Forces for Taylor
10:23:02 10 from Burkina, Burkina Faso.

11 Q. Now did you know a person by the name of Eddie Kanneh? I
12 apologise, your Honour. Salami is S-A-L-A-M-I. Mustapha Jallow
13 is M-U-S-T-A-P-H-A J-A-L-L-O-W. Eddie Kanneh is E-D-D-I-E
14 K-A-N-N-E-H. Now would you please tell us did you know a person

10:23:41 15 by the name of Eddie Kanneh?

16 A. Yes.

17 Q. Who is he?

18 A. Eddie Kanneh, I got to know Eddie Kanneh. Eddie Kanneh
19 visited me to my house in Monrovia when he had some relationship
10:23:57 20 with my former wife when my former wife introduce him to me,
21 saying that he is one of my brother from Sierra Leone, Bo. When
22 Eddie Kanneh publicly told me that he was in charge of the
23 business of diamond, he was the RUF diamond manager, he received
24 diamonds and sometimes bring it to Liberia to his ex-wife.

10:24:20 25 That's how I got to know Eddie Kanneh.

26 Q. And did you know --

27 JUDGE DOHERTY: Excuse me, Ms Hollis, when he said his
28 ex-wife, whose ex-wife?

29 MS HOLLIS: Thank you, your Honour.

1 Q. Yes, Mr Witness, could you clarify that. You said that --

2 A. I said my former wife because we are no longer together.

3 That's why I said my former wife. My former wife.

4 Q. Now did you know a person by the name of Jack the Rebel?

10:24:54 5 A. Yes. Jack the Rebel, his real name is George Duana. He is
6 a Gbandi by tribe from Kolahun. He is one of the junior forces
7 for NPFL.

8 Q. Now you say that he's one of the --

9 PRESIDING JUDGE: We need some spellings, please, before
10:25:16 10 you proceed.

11 MS HOLLIS:

12 Q. You said that he was Gbandi by tribe; is that correct?

13 A. Yes.

14 Q. Do you know how to spell Gbandi?

10:25:29 15 A. G-B-A-N-D-I.

16 PRESIDING JUDGE: The real name?

17 MS HOLLIS:

18 Q. And you also said it was George Duana was the real name?

19 A. Yeah. George Duana.

10:25:44 20 MS HOLLIS: Your Honours, I think that would be the regular
21 spelling for George and then D-U-A-N-A.

22 Q. You said that he was one of the junior forces for the NPFL.
23 What do you mean by junior forces?

24 A. Junior forces were people that when the NPFL first arrived
10:26:13 25 in Liberia with their rebellion war, the first people who were
26 trained in Liberia, those were the people who they called the
27 junior forces.

28 Q. Were they different than the junior commandos?

29 A. Junior commando and junior commando is just the same.

1 Sometimes they refer to them as junior commando or as junior
2 forces.

3 Q. Did you know a person who was referred to as Senegalese?
4 That, your Honours, would be S-E-N-E-G-A-L-E-S-E?

10:26:51 5 A. Senegalese, I know him. He was a trustworthy bodyguard to
6 Mr Taylor at last.

7 Q. Now I believe earlier you mentioned a person by the name of
8 Memuna who worked at the RUF guesthouse; is that correct?

9 A. Yes. Memuna and Rashim.

10:27:22 10 Q. That would be M-E-M-U-N-A. And did you know Memuna's full
11 name?

12 A. No, I only knew the Memuna name.

13 Q. And I think you also said that there was Memuna and Rashim;
14 is that correct?

10:27:48 15 A. Rashim. Rashim. Earlier I forgot his name. When I said
16 that two people were working at the guesthouse, the RUF
17 guesthouse, it was Rashim and Memuna. Rashim was one of the
18 bodyguards behind Foday Sankoh and also Mr Taylor maintained him
19 in the guesthouse as the commander there.

10:28:08 20 Q. And did you know his full name?

21 A. Only Rashim I know.

22 Q. And could you spell Rashim for us?

23 A. I can't spell it. It is a Sierra Leonean - it's a Sierra
24 Leonean.

10:28:29 25 MS HOLLIS: Your Honour, I believe it would be R-A-S-H-I-M.

26 Q. Did you know a person --

27 PRESIDING JUDGE: Ms Hollis, we are approaching the break
28 so you could find an appropriate place to stop.

29 MS HOLLIS: This would be an appropriate time, your Honour.

1 PRESIDING JUDGE: We will adjourn for half an hour and
2 reconvene at 11. Thank you.

3 [Break taken at 10.30 a.m.]

4 [Upon resuming at 11.00 a.m.]

10:59:50 5 PRESIDING JUDGE: Madam Court Manager, do I understand
6 there is an interpreter to be sworn-in.

7 MS IRURA: That is correct, your Honour.

8 PRESIDING JUDGE: Then please swear the person in.

9 [Interpreter sworn]

11:00:29 10 PRESIDING JUDGE: Thank you. Madam Prosecutor, please
11 proceed with the witness.

12 MS HOLLIS: Thank you, Madam President. I would simply
13 note that the Prosecutor is no longer at the Prosecution table.

14 PRESIDING JUDGE: So noted.

11:00:46 15 MS HOLLIS: Thank you.

16 Q. Mr Witness, would you please tell us if you knew a person
17 who was referred to as High Command?

18 A. High Command is one of the RUF soldiers. When the RUF came
19 to assist the Liberian militia and Benjamin, he was one of the
11:01:16 20 men who was taken by Benjamin as his bodyguard. He was a Sierra
21 Leonean, Mende by tribe.

22 Q. And do you know a person by the name of Francis Mewon,
23 sometimes also referred to as Francis Menwon? And, your Honours,
24 that is F-r-a-n-c-i-s M-e-w-o-n, or in the alternative

11:01:44 25 M-e-n-w-o-n?

26 A. I know Francis Menwon, but actually I never knew his
27 nationality or his duty, but I knew him in person.

28 Q. How did you know him?

29 A. I saw him amongst the RUF members.

1 Q. Now at this time I would like to have a series of
2 photographs shown to the witness and, if the Court permits, I
3 would like to have this marked as a cumulative exhibit being
4 given one number and then letters in sequence.

11:02:36 5 PRESIDING JUDGE: If you could indicate the tabs, please,
6 where we find these photographs?

7 MS HOLLIS: Yes, your Honour. The tabs - the tab is the
8 same for all of them. It is tab 29 and the first photograph is
9 photograph G, as in Golf. May I ask what this MFI-number is?

11:03:11 10 MS IRURA: This would be MFI-6.

11 MS HOLLIS: Thank you. And, your Honours, I would ask this
12 be MFI-6A.

13 PRESIDING JUDGE: MFI-6A it is.

14 MS HOLLIS: If that could first be shown to the witness and
11:03:31 15 then if it could be put on the projector, please:

16 Q. Mr Witness, does your signature appear on this photograph?

17 A. Yes.

18 Q. Did you identify the person whose name is written on the
19 photograph?

11:03:55 20 A. Benjamin Yeaten.

21 Q. Thank you. And if the witness could now be shown photo I,
22 which I would request be marked as MFI-6B as in Bravo.

23 PRESIDING JUDGE: The photograph is MFI-6B.

24 MS HOLLIS: And that is tab 29, photograph I:

11:04:51 25 Q. Now, Mr Witness, first of all does your signature appear on
26 that photograph?

27 A. Yes, this is my signature.

28 Q. And when shown that photograph, did you identify the person
29 with the name written on the photograph?

1 A. Sam Bockarie.

2 Q. And, Mr Witness, when shown that photograph you identified
3 that person as Sam Bockarie, is that correct?

4 A. Yes.

11:05:25 5 Q. Thank you. And if the witness could now be shown tab 29,
6 photograph K, which we would ask be marked as MFI-6C, as in
7 Charlie.

8 PRESIDING JUDGE: The photograph will be marked as MFI-6C.

9 MS HOLLIS:

11:05:52 10 Q. And does your signature appear on that photograph?

11 A. Yes, yes.

12 Q. And did you identify the individuals whose names are
13 written on that photograph?

14 A. Sam Bockarie and Zig Zag Mahzar.

11:06:15 15 Q. And if the witness could now be shown photograph JJ and if
16 that could be marked as 6D, as in Delta.

17 PRESIDING JUDGE: The photograph is marked as MFI-6D.

18 MS HOLLIS:

19 Q. And, sir, is your signature on that photograph?

11:06:44 20 A. This is my signature.

21 Q. And did you identify the person whose name is written on
22 that photograph?

23 A. Yes, this is Abu Keita.

24 Q. And if the witness could be shown photograph W and if that
11:07:08 25 could be marked as 6E, as in Echo.

26 PRESIDING JUDGE: The photograph is so marked as MFI-6 E.

27 MS HOLLIS:

28 Q. Does your signature appear on that photograph, and again it
29 is tab W?

1 A. Yes, this is my signature.

2 Q. Did you identify the persons - the names written on that
3 photograph?

4 A. This is Momoh Jibba, this is Mr Taylor, this is Musa, the
11:07:49 5 Deputy ADC, and this man is the Councillor for Africa and this is
6 Joseph Montgomery.

7 Q. Could I note for the record that when the witness said that
8 "this man is the Councillor for Africa" he was pointing at the
9 man in the dark suit who is shaking hands with Charles Taylor.

11:08:17 10 Thank you.

11 A. Yes.

12 Q. Now, Mr Witness, you have testified that from August of
13 1997 until the end of 1999 you were the assistant director of
14 operations for the SSS, and you have also testified that during
11:08:44 15 the time period 2001 and 2002 you were the deputy chief of staff
16 and acting chief of staff of the army division. Now, sir, I
17 would like to ask you that, based on your experiences during
18 these times and based on your observations, how would you
19 characterise the Accused's relationship with Benjamin Yeaten?

11:09:17 20 A. His relationship with Benjamin Yeaten was cordial.

21 Q. And what do you mean by that?

22 A. He was my boss, because every day we met and we spoke and I
23 got instructions from him. If I had instruction from him, what
24 he wanted me to do, I would do and then every day we spoke.

11:09:41 25 Q. Perhaps my question was not clear. Let me ask again. How
26 would you characterise the relationship between Charles Taylor
27 and Benjamin Yeaten?

28 A. The relationship between Benjamin Yeaten and Mr Taylor is
29 like father and son.

1 Q. And who was the father and who was the son?

2 A. Mr Taylor is the father and Benjamin Yeaten is the son.

3 Q. What do you mean when you say that?

11:10:25

4 A. He himself, Mr Taylor, made it clear to all of us, the SS
5 members, that Benjamin Yeaten is like his son.

6 Q. And did you - what did you observe about Benjamin Yeaten's
7 demeanour towards Charles Taylor?

8 A. It was very cordial, because Benjamin Yeaten he did
9 anything. If he did anything, he would not be questioned.

11:10:54

10 Sometimes in fact he did certain things before taking instruction
11 from Mr Taylor and, even when Mr Taylor got to know about it, he
12 would just forget about it and nothing went out of it.

13 Q. Now, when you say "If he did anything, he would not be
14 questioned", what do you mean? Could you explain that?

11:11:19

15 A. On one occasion when Special Court wanted to arrest
16 Mr Taylor in Ghana, in less than one hour Benjamin Yeaten
17 executed two of the ministers in Liberia. He arrested the
18 Vice-President and he went and had him in jail, and when
19 Mr Taylor came he explained on the radio publicly that the

11:11:50

20 Liberian people should now consider that it is a mistake and that
21 was all.

22 Q. Now, how would you characterise Charles Taylor's
23 relationship with the RUF?

11:12:18

24 A. It is also that he was the father of RUF for the fact that
25 Sam Bockarie made it clear to me that when they were going on a
26 mission and Mr Taylor was sending him, Sam Bockarie, on a
27 mission, he was small. So, the instruction had been between
28 Mr Taylor and Foday Sankoh at the time, but now he had come and
29 had seen Mr Taylor so he had talked to his father and he

1 receiving well in his body and anything they are supposed to do
2 now to carry on his mission everything will go on successfully.
3 He made that clear to me when I was taking him back to Sierra
4 Leone.

11:13:00 5 Q. And when he told you that he was receiving well in his body
6 and anything they are supposed to do now to carry on his mission,
7 did he explain what that mission was?

8 A. I didn't ask him for further questions. He was just
9 explaining to me.

11:13:23 10 Q. And did he say who, if anyone, had given him the mission?

11 A. He only said, "I have spoken with my father". That was
12 Mr Taylor he was referring to, the Godfather. So, he was
13 receiving well. He was feeling fine.

14 Q. Now, when you testified yesterday, you testified that you
11:13:54 15 fought as a member of ULIMO against the RUF and NPFL in Sierra
16 Leone. For what period of time did you fight against the RUF and
17 NPFL in Sierra Leone?

18 A. I said when ULIMO broke through to get to Lofa, that is
19 from Zorzor, they continued to attack and captured Voinjama.

11:14:25 20 Also, later they advanced to get to Kolahun and they advanced to
21 get to Foya. The remnant NPFL that were trapped all fled to
22 Sierra Leone. They joined forces with the RUF and started
23 attacking ULIMO positions - I said that yesterday - and also on
24 the other side at Gbange the NPFL were there and later organised
11:14:57 25 the Lofa defence forces and they were also attacking us from that
26 position. That was from Gbange route.

27 Q. Mr Witness, I apologise. Perhaps my question was not
28 clear. Yesterday you testified that as a member of ULIMO you
29 fought against the RUF and the NPFL in Sierra Leone. During what

1 period of time did you fight against the RUF and NPFL in Sierra
2 Leone?

3 A. That is the end of 1991 to 1992.

4 Q. So, could you give the Court an estimate of how many months
11:15:45 5 or how long you were engaged in that fighting in Sierra Leone?

6 A. Unless you want to talk particularly about me, but if you
7 --

8 Q. I am talking particularly about you.

9 A. My own was just over six months when I crossed to Liberia.

11:16:09 10 Q. Now during that six months that you were fighting against
11 RUF and NPFL in Sierra Leone, what area of the country were you
12 fighting in?

13 A. I fought in Pujehun District. That was from Bandajuma
14 where the coal tar is ending.

11:16:31 15 Q. For this question it is necessary to get into these towns
16 that I may not be able to spell. Now, you said that you fought
17 in Pujehun District, is that correct?

18 A. I said that.

19 Q. I believe that is P-u-j-e-h-u-n. Now, you said that was
11:16:55 20 from and then I don't know what you said. You said Pujehun
21 District from some place to some place. Would you repeat those
22 locations again?

23 A. I said Bandajuma, where the coal tar stops.

24 Q. Right.

11:17:16 25 JUDGE DOHERTY: Mr Interpreter, "coal tar" is not an
26 expression that is "recognised. Please interpret it properly.

27 MS HOLLIS: And, your Honours, I believe that the location
28 he spoke of, Bandajuma, is B-a-n-d-a-j-u-m-a. Now, Mr Witness --

29 PRESIDING JUDGE: Are these locations in Liberia, or where?

1 MS HOLLIS: No, your Honour, in Pujehun District in Sierra
2 Leone.

3 PRESIDING JUDGE: Is this the evidence from the witness?

4 MS HOLLIS: Yes, your Honour:

11:17:56 5 Q. Now, you said "where the coal tar stops". What do you mean
6 when you say "where the coal tar stops"?

7 A. I mean Bandajuma, because the only thing I can say that is
8 the tar road. The tar road. Where the tar road stop.

9 Q. Thank you. Now, during this time that you fought in
11:18:21 10 Pujehun District, what if anything did you learn about the
11 treatment of civilians by the NPFL and the RUF?

12 A. Whenever they were retreating people who refused to retreat
13 with them they would execute them, and some of the places where
14 they got to they wanted people to carry their loads for them. If
11:18:56 15 you refused to carry the load, you would be executed. And people
16 were forced to join the forces under the ages of 12, 14 up to
17 25/30 years, both male and female. And also if they saw a woman
18 that they wanted, if you, the husband, resisted you will be
19 executed also. Those are some of my experiences that I
11:19:34 20 experienced.

21 Q. Now, yesterday you were testifying about what you had
22 learned about the treatment of civilians by the NPFL in Liberia
23 and you testified that - you testified something to the effect
24 that if a civilian has food and a soldier fighter does not have
11:20:18 25 food that --

26 A. Have blood.

27 Q. What was that?

28 A. That means --

29 PRESIDING JUDGE: Mr Witness, I would urge you to do what I

1 asked you yesterday, which is to listen first to your
2 interpreter, not to answer the lawyer when she has just finished.
3 Just listen to the question carefully as it is interpreted.

4 THE WITNESS: Okay.

11:20:42

5 MS HOLLIS:

6 Q. So, you were talking about if a civilian has food and a
7 soldier fighter does not have food, then the civilian does not
8 have blood and the fighter would take the food. Now, could you
9 explain for us what you mean when you say that the civilian does
10 not have blood?

11:21:01

11 A. That means the fighter who is having gun cannot be hungry
12 and you, an unarmed man or unarmed person, as a civilian you
13 don't have a gun then you have food to eat. That cannot be.
14 That is why civilian do not have blood. That is the meaning.

11:21:32

15 They would take the food from you. That means you don't have
16 blood. The first thing the armed person who has a gun will eat
17 his stomach fill before you who don't have gun before you can
18 eat, to be exact.

19 Q. To your knowledge, who used this expression that civilians
20 don't have blood?

11:21:56

21 A. All the warring factions. That is the NPFL, ULIMO, that is
22 APC and that is RUF.

23 Q. Now, during this time, were you familiar with a term
24 "capture live"?

11:22:26

25 A. Yes.

26 Q. What does that term mean?

27 A. That means if you get to the village where you just
28 captured and if you see any woman who you like you don't have to
29 approach her. You just take her as your woman. That is what we

1 call capture alive.

2 Q. And who used this term "capture live"?

3 A. It was the same militia that were fighting for Mr Taylor.

4 All were using the word "capture alive".

11:23:17 5 Q. Now, during this time did you hear the term "SBU"?

6 A. Yes.

7 Q. And what did that mean to you?

8 A. Small boy unit. Small boy unit. This small boy unit it is

9 NPFL who brought about this small boy unit. When the NPFL came

11:23:50 10 they had a commander called Zoupon[phon] and after that --

11 Q. Just a moment, please. You said a Commander Zoupon?

12 A. Yes, his name was Zoupon.

13 Q. Do you know how to spell that name?

14 A. No, I can't spell it.

11:24:10 15 Q. As he pronounced it, your Honours, I believe that would be

16 Z-o-u-p-o-n:

17 Q. Now, you said that Zoupon was a commander of the SBU?

18 A. SBU, yes.

19 Q. And how do you know that Zoupon was a commander of the SBU?

11:24:37 20 A. During the time the ULIMO and the NPFL merged, Zoupon had

21 his own units of so, so small boys from 15 years, from 14 years,

22 to 13 years. He had a unit that he were working during the time

23 when NPFL and ULIMO merge. And after that also, when I took over

24 as army division deputy chief of staff, all the divisions had a

11:25:09 25 special SBU. That is a small boy unit. And you will receive

26 your supply and, just how you supply the other battalion or other

27 brigade, you will also supply the small boy unit. At the end of

28 every month how did you use your supply you have to submit that

29 supply list to Benjamin Yeaten and he would then take it forward

1 to Mr Taylor. It will be there, the small boy unit. This is the
2 amount they received.

3 PRESIDING JUDGE: Ms Hollis, I am sorry to interrupt. I
4 didn't quite get from the interpreter the ages of these people
11:25:50 5 that belonged to this small boys unit.

6 MS HOLLIS: Yes, your Honour, let me ask again.

7 Q. Would you please tell us again to your knowledge the ages
8 of the boys that belonged to the small boys unit?

9 A. Twelve years, 13, 14, 15, 16.

11:26:11 10 Q. Now when you were talking about getting to know Zoupon as
11 the commander of the SBU, you said it was when ULIMO and NPFL
12 were working together. Now, Zoupon was the commander of the SBU
13 unit for which group? ULIMO, or NPFL?

14 A. He was working under the SS Cobra. At that time NPFL had
11:26:41 15 their SS unit. During the time they brought their rebellion war
16 at that time Mr Taylor had not yet been elected, so under Joseph
17 Montgomery they had a unit called SBU commander and their
18 commander was Zoupon. So, that was what they had. And after
19 that I said all other divisions had SBU units and each of the SBU
11:27:15 20 - my SBU unit commander was Junior and he was just about
21 ten/eleven years old. He had a group full of ten, 15, 13, 14. I
22 had them. Just like the other divisions they also had their own
23 SBU units within their division, yes.

24 Q. Thank you, Mr Witness. Now, I would like to direct your
11:27:45 25 attention to the period August 1997 to 2002. Now, during that
26 time did you listen to commercial radio stations in Liberia?

27 A. I used to listen to commercial radio.

28 Q. What stations did you listen to?

29 A. We had a local station in Liberia, ELBC. We listened to

1 that and myself personally I had a satellite at my house. I
2 listened to BBC. I listened to CNN.

3 Q. Now, at the moment we are talking about radio and so what
4 radio stations did you listen to? You mentioned a local station.
11:28:36 5 Any others?

6 A. I listened to local stations, ELBC.

7 Q. Did you listen to any other radio stations?

8 A. BBC.

9 Q. During this time what, if anything, did you hear on these
11:28:55 10 radio stations about the treatment of civilians in Sierra Leone?

11 A. What I heard and what I saw over the satellite was the
12 amputation of people's hands and they used to call that "short
13 sleeve" and "long sleeve".

14 Q. Now, you said that you saw it on the satellite. Are you
11:29:20 15 talking about you saw it on television?

16 A. On CNN television.

17 MR GRIFFITHS: Your Honour, I fail to see if the
18 Prosecution want to adduce evidence of this kind why the primary
19 sources, bodies who keep records like the BBC and the CNN, can't
11:29:45 20 be approached directly to provide this evidence and why this
21 witness has to be used as a mouthpiece to place this kind of
22 evidence before the Court.

23 PRESIDING JUDGE: Mr Griffiths, you would agree that this
24 is hearsay evidence, is that correct?

11:30:00 25 MR GRIFFITHS: Yes, I would, your Honour. Yes.

26 PRESIDING JUDGE: Ms Hollis, what is your response?

27 MS HOLLIS: Your Honour, this evidence is relevant to
28 notice. The fact that this witness, living in Liberia at the
29 same time the Accused lived in Liberia and listened to radio and

1 heard this information and watched television and heard this
2 information, is relevant to the fact that this type of
3 information was available in Liberia.

4 PRESIDING JUDGE: Do you wish to say anything in reply?

11:30:34 5 MR GRIFFITHS: Well, my point remains, your Honour. If my
6 learned friend wants to make the point that such material was
7 readily available and broadcast within Liberia, there are a
8 number of very easy ways of doing that. And the difficulty I
9 have, if the evidence comes before the Court in this fashion, is
11:30:59 10 being able to cross-examine this witness as to the details of the
11 particular programmes he saw, because no doubt given the passage
12 of time he won't be in a position to answer any questions as to
13 the exact nature of the material he either heard or viewed.
14 Consequently, we are handicapped in our ability to test the
11:31:23 15 veracity of the account he has now given the Court. That is the
16 problem.

17 PRESIDING JUDGE: Ms Hollis?

18 MS HOLLIS: May I respond briefly to that, your Honour?

19 PRESIDING JUDGE: Yes, Ms Hollis.

11:31:34 20 MS HOLLIS: Thank you. First of all, if he is
21 cross-examined and is unable to give details, then that would go
22 to the weight your Honours would give to his evidence. Secondly,
23 there may be many ways to provide this information, but providing
24 it through this witness is one permissible way to do it. The
11:31:51 25 evidence is relevant because it goes to awareness and knowledge
26 of this Accused of crimes in Sierra Leone, and this witness is
27 saying that while he was in Liberia at the same time Charles
28 Taylor was in Liberia this kind of information was available on
29 radio and on television.

1 PRESIDING JUDGE: I will allow the question that Ms Hollis
2 is asking. The issues raised by the Defence are pertinent.
3 However, as you know under our rules hearsay evidence is
4 admissible. The issues raised go to the weight of that evidence.
11:32:37 5 I do believe that the Defence will have an opportunity to
6 cross-examine this witness and that we shall see what the witness
7 says when that cross-examination happens. So, Ms Hollis, please
8 go ahead with the question.

9 MS HOLLIS: Thank you, Madam President. Your Honour, I
11:32:59 10 believe that the witness had answered that question before the
11 objection was raised.

12 JUDGE LUSSICK: Yes, he ended up saying - ending his
13 comments with "short sleeve" or "long sleeve".

14 MS HOLLIS: Yes, your Honour. Thank you very much:

11:33:17 15 Q. And did the stations that you heard and the TV programmes
16 that you heard, did they show or explain what was meant by "short
17 sleeve" and "long sleeve"?

18 A. What I heard and what I saw over the satellite was when
19 they said "short sleeve" it meant that they will cut your hand at
11:33:54 20 the elbow and "long sleeve" was when they cut off the hands at
21 the wrist.

22 Q. Now when you say they cut off the hand and you show your
23 wrist, what was that called?

24 A. That is the "long sleeve", they call that one "long
11:34:09 25 sleeve", and if they cut it around your elbow then it was "short
26 sleeve".

27 MS HOLLIS: Your Honour, I --

28 PRESIDING JUDGE: He touched somewhere just below the
29 shoulder. It was not the elbow.

1 MS HOLLIS: Yes, your Honour. It was the upper arm, near
2 the shoulder.

3 PRESIDING JUDGE: So, Mr Interpreter, please watch the
4 video, sorry watch the screen, and be accurate in your
11:34:39 5 interpretation.

6 THE INTERPRETER: I am sorry, your Honour.

7 MS HOLLIS:

8 Q. Now when you heard these programmes and saw them, did these
9 programmes say who were doing these things? Who were amputating?

11:35:00 10 A. They talked about the AFRC. They mentioned the West Side
11 Boys and the RUF.

12 Q. Now, to your knowledge during this time period, did the
13 Accused, Charles Taylor, have television access in the Executive
14 Mansion?

11:35:24 15 A. He had a television at the Executive Mansion in his fourth
16 floor office. In his waiting office, where people who go to see
17 the President where they wait first before they enter his office,
18 they had a CNN television there.

19 MS HOLLIS: [Microphone not activated] That concludes my
11:35:56 20 direct examination. I would like at this time, with your
21 permission, to offer into evidence the exhibits which have been
22 marked for identification.

23 PRESIDING JUDGE: Mr Griffiths?

24 MR GRIFFITHS: Your Honour, would it be appropriate to
11:36:14 25 adopt the same procedure we adopted in relation to all other
26 witnesses, which is to address this matter at the conclusion of
27 the evidence of the witness?

28 PRESIDING JUDGE: Yes. Ms Hollis, as you will recall,
29 before the exhibits are actually admitted in evidence we allow

1 the Defence to cross-examine upon them.

2 MS HOLLIS: Right, your Honour.

3 PRESIDING JUDGE: And then we decide whether we will admit
4 them.

11:36:38 5 MS HOLLIS: As your Honour pleases.

6 PRESIDING JUDGE: If you don't mind, that is the procedure
7 the Court will follow.

8 So, Mr Griffiths, I will ask the Defence counsel that you
9 decide to cross-examine this witness. Will that be yourself,

11:36:50 10 Mr Griffiths?

11 MR GRIFFITHS: It will be myself, your Honour, yes.

12 PRESIDING JUDGE: Thank you.

13 MR GRIFFITHS: Your Honour, can I at the outset hand out to
14 your Honours and the witness a paginated bundle of various

11:37:02 15 documents relating to the contact between this witness and the
16 Office of the Prosecutor over the course of something like a
17 three year period between February 2005 and the beginning of
18 January 2008. I have a copy for the witness also. Now --

19 PRESIDING JUDGE: Mr Griffiths, if you could please hold on
11:37:43 20 until we have all received the bundles.

21 MR GRIFFITHS: I am sorry.

22 PRESIDING JUDGE: I will also ask Court Management to
23 ensure that whatever document is referred to it is put up for the
24 public to be able to see.

11:38:23 25 MS HOLLIS: And, your Honour, could the Prosecution have a
26 copy of this bundle?

27 MR GRIFFITHS: Well, your Honour, the difficulty is that we
28 are merely dealing with documents here disclosed to us by the
29 OTP, so we anticipate that there will be no surprises in the

1 material.

2 PRESIDING JUDGE: It is only fair, Mr Griffiths, when you
3 are cross-examining the witness that the other side follows and
4 have a document - the bundle - before them. Now is a bundle
11:38:51 5 available, or is it not?

6 MR GRIFFITHS: We have a bundle available, your Honour, but
7 I was hoping that we could use this with the Court Usher so that
8 the witness could stay in his current position and the Court
9 Usher could then direct the particular page to which I am
11:39:09 10 referring on to the monitor so that we could all see, but if your
11 Honour doesn't --

12 PRESIDING JUDGE: So, in other words isn't there a spare
13 bundle that the Prosecution can have on their side? Is this what
14 you are saying?

11:39:20 15 MR GRIFFITHS: Well I will deny my learned friend,
16 Mr Munyard, a copy, your Honour.

17 PRESIDING JUDGE: That is very kind, thank you.

18 MR GRIFFITHS: Now can I explain the scheme of this bundle
19 before we commence, your Honour. What I have done is I have
11:39:53 20 arranged in chronological order the documentation we have
21 received which outlines contact between this witness and the
22 Office of the Prosecutor over the period I have already
23 indicated. You will note that the bundle is paginated by hand in
24 the bottom right-hand corner and that will be the number I will
11:40:18 25 be referring to in directing my questions for the witness.

26 CROSS-EXAMINATION BY MR GRIFFITHS:

27 Q. Do you understand that, witness? Witness, do you see
28 numbers in the bottom right-hand corner of that bundle?

29 A. Okay.

1 Q. Okay. Now, I will endeavour in asking you questions to
2 proceed at a pace that allows you to follow what it is I am
3 asking you. Do you understand?

4 A. I am listening to you.

11:41:04 5 Q. I also intend to be as fair to you as my instructions
6 allow. Do you understand that?

7 A. Yes.

8 Q. And if at any time you do not understand any of the
9 questions I ask you, you only have to ask me to repeat it, or
11:41:21 10 clarify it, and I will. Will you do that?

11 A. Yes.

12 Q. Now we are going to start off, witness, with one or two
13 details about your background, then we are going to deal with a
14 number of general matters and then I intend to proceed to deal
11:41:41 15 with particular aspects of the evidence you gave. Do you follow
16 me?

17 A. Yes.

18 Q. First of all, can we turn to page 2 of the bundle, please.
19 In order to explain what this document is, this is a record of an
11:42:09 20 interview conducted with you by Officers from the OTP on 23
21 February 2005, okay? Now, for current purposes I am merely
22 interested in the sixth line from the bottom of the page. That
23 says that you were born on 7 June 1968. Is that right?

24 A. Yes.

11:42:40 25 Q. That means you are now 39 years of age. Is that right?

26 A. If you check it up I don't know if it is 39 now or 40, but
27 I was born June 7, 1968.

28 Q. It is January now, June is five months away and so try and
29 help us. Are you now 39j or 40?

1 A. I am still 39.

2 Q. Your mother was born in Sierra Leone, wasn't she?

3 A. Yes.

4 Q. Across the border from Sierra Leone - from Liberia, I am
11:43:30 5 sorry - is that right?

6 A. You will have to cross the border. I stayed very close to
7 Bomaru.

8 Q. That is very close to the Liberian Sierra Leonean border,
9 isn't it?

11:43:47 10 A. Yes.

11 Q. Is your mother a Mandingo?

12 A. No, Mende.

13 Q. But your father is a Mandingo, isn't he?

14 A. Yes.

11:44:01 15 Q. And he was born in Liberia?

16 A. Yes.

17 Q. Now you, during your ULIMO days, had the nom de guerre
18 Godfather, didn't you?

19 A. Please repeat the question.

11:44:22 20 Q. You had the Nickname during your ULIMO days of Godfather,
21 didn't you?

22 A. Yes.

23 Q. Now dealing with other members of your family, the leader
24 of LURD was your brother, wasn't it?

11:44:46 25 A. No.

26 Q. His name was Asia, A-s-i-a, Sheriff. He was your brother,
27 wasn't he?

28 A. He is not my brother.

29 Q. Let us approach it differently then, shall we? Is he

1 related to you?

2 A. I know him, but not as a family.

3 Q. Was his Nickname Cobra?

4 A. Yes.

11:45:19 5 Q. Was his name Asia Sherif?

6 A. Asia Sherif. I know him to be one of the SSS member before
7 he crossed to Guinea.

8 Q. So he had the same surname as you, is that right?

9 A. We do not spell it the same way.

11:45:49 10 Q. Pronounced [microphone not activated]?

11 A. Yes.

12 Q. Was it someone you knew personally?

13 A. I do know him as an SSS member. He was one of my junior
14 officers in the SSS.

11:46:04 15 Q. So, he was someone you commanded whilst you were assistant
16 director within the SSS?

17 A. No.

18 Q. You never commanded him?

19 A. No.

11:46:19 20 Q. Are you telling us the truth and nothing but the truth when
21 you tell us he is not your brother?

22 A. He is not my brother.

23 Q. Very well. Let me ask you about somebody else then, shall
24 we? Abu Keita, who you mentioned, he is your cousin, isn't he?

11:46:44 25 A. No.

26 Q. Again, are you telling us the truth about that?

27 A. I am telling the truth. Nothing but the truth.

28 Q. Because I recall that this morning when you were talking
29 about him you mentioned that you had attended a meeting between

1 him and another, even though you weren't invited, because - and I
2 quote - "I wanted to make sure he was in good hands". Was that
3 because he was your cousin?

4 A. No, because it is I who recommended Abu Keita. I wanted to
11:47:25 5 make sure that he was in good hands.

6 Q. Very well. I will come back to your background a little
7 later, but can we move on and deal with another topic, please.
8 The topic I have entitled, so that you can follow it, "Artificial
9 Frontiers". Do you understand what I mean by that?

11:47:52 10 A. No.

11 Q. Well, put bluntly the frontier between Liberia and Sierra
12 Leone is totally artificial, isn't it, because the same people
13 live on both sides of the border? That is right, isn't it?

14 A. Yes.

11:48:14 15 Q. So we have tribes which are artificially split by that
16 boundary, don't we?

17 A. What do you mean by "the boundary"?

18 Q. There are Mandingos living in Sierra Leone and Mandingos
19 living on the other side of the frontier in Sierra Leone. That
11:48:37 20 is what I mean, quite simply. You would agree, wouldn't you?

21 A. Yes, I agree on that. Yes.

22 Q. Because for centuries people living in that part of Africa
23 have been crossing backwards and forwards across that imposed
24 frontier without anyone stopping them. That is right, isn't it?
11:49:05 25 Wouldn't you agree?

26 A. People I know that they are related on the other side. The
27 same family are related on the other side. This I know.

28 Q. That is the simple point I am trying to make, because when
29 we examine that a little further put bluntly that border is

1 totally porous, isn't it? People flowing in each direction
2 without hinder, would you agree?

3 A. Yes.

4 Q. And that has been the case for centuries, would you agree?

11:49:40 5 A. That has been existing up to now.

6 Q. The same language is spoken in both, yes? Would you agree?

7 A. They speak the same language on the other side. On the
8 other side they do speak the same language.

9 Q. And as your own experience illustrates, they inter-marry
11:50:02 10 across that boundary, don't they, like your parents did?

11 A. Yes.

12 Q. And also within that area, straddling that frontier,
13 basically they use the same currency, don't they? The Liberian
14 dollar?

11:50:22 15 A. Yes.

16 Q. And furthermore the English spoken on both sides of the
17 boundary has the same accent, doesn't it?

18 A. No. The dialect is the same, but not the English.

19 Q. Very well. I am not going to press you on that. I now
11:50:48 20 want to ask you about another matter and for this I would be
21 assisted if MFI-1 could be put up on the screen, please. I
22 wonder if it could be magnified in such a way so that we could
23 see the map in its totality? I think you may have to move. I
24 think you will have to move seats, because I am going to ask you
11:51:43 25 to indicate various matters on this map. First of all, the red
26 line which runs from Monrovia to Fassama, if we continue along
27 that line all the way to the border with Guinea, much of the
28 country to the left of that line is jungle, isn't it?

29 A. This is the deep forest, of course.

1 Q. And does that extend down to where we see towards the
2 bottom left-hand corner of the map Lofa Bridge? Is that forest
3 as well?

4 A. The forest starts from Bopolu and ends at Kolahun.

11:52:50 5 Q. And if one goes directly horizontally across the map to the
6 left-hand edge of the map, does the jungle continue all the way
7 to the Sierra Leonean border?

8 A. No, the jungle stops at - starts from Bopolu and ends at
9 Kolahun.

11:53:08 10 Q. Can you show us then the width of that? Where does it
11 stretch from? You have given us the dimensions north to south.
12 Help us, please, with the dimensions east to west of the jungle?

13 A. No, I do not know. What I know is the forest starts from
14 Bopolu and ends at Bopolu(sic), and from Kolahun that is not
11:53:38 15 forest any more. That is the coffee and cocoa farm up to the
16 border.

17 Q. I am sure it is my fault and so let me ask the question
18 again. Does that forest extend leftwards on the map as we look
19 at it across the Sierra Leonean border?

11:53:55 20 A. On the left side it goes as far as Vahun and comes down to
21 ULC, or to Kongbor to SSC camp. That is the forest.

22 Q. Now, I ask for this reason. The route you describe that
23 you took when you went, as you have told us, to fetch Sam
24 Bockarie on behalf of Mr Taylor, that basically was the green
11:54:26 25 route, wasn't it?

26 A. I used the green route from Monrovia to Careysburg, Kakata,
27 Salala, Gbatala and Gbange. You go on the left side, the green
28 side, to Salayea, to Zorzor and from Voijnama you go to Kolahun.
29 As soon as you cross Kolahun, just a five miles different you

1 will meet up with two junctions: one going to Foya and the one
2 that is going on your left is going directly to Vahun. From
3 Vahun you get a road from there and the last village on Liberian
4 soil is called Folima. That is the last town on Liberian soil.

11:55:18 5 The first town is Bomaru.

6 Q. But you basically took the green route, didn't you?

7 A. The green route is coming it has - it stops at Kolahun.

8 Q. That is the route that you took, wasn't it? That was the
9 route that you took when you went to fetch Sam Bockarie?

11:55:41 10 MS HOLLIS: Your Honour, excuse me, but the witness has
11 shown very clearly that he came the yellow route to Vahun and
12 Bomaru. It appears now that counsel is actually arguing with the
13 witness.

14 PRESIDING JUDGE: Yes, to be fair to the witness we have
11:55:55 15 all seen him demonstrate that from Kolahun he no longer took the
16 green route. He took the yellow route to Vahun and Bomaru.

17 MR GRIFFITHS: It is my fault, your Honour. Let me ask it
18 differently:

19 Q. From Monrovia to Kolahun you basically followed the green
11:56:12 20 route, didn't you?

21 A. Yes, yes.

22 Q. For that is - that is the only part paved road running from
23 Monrovia to that part of the country. That is right, isn't it?

24 A. You have the other road, that is the yellow road, also.

11:56:34 25 You can use the yellow route and get to Vahun and the same route
26 is going to Yandohun. From Yandohun to Kamata to [indiscernible]
27 you will get to the same Kolahun and then you go to Foya again.

28 Q. Let me ask my question differently. I am sure it is my
29 fault. In terms of Tarmac'd roads, yes, the only route leading

1 out of Monrovia to the north, places like Kolahun, which is
2 paved, asphalted, is the green route, isn't it?

3 A. No.

4 Q. Tell me which road is asphalted then, please?

11:57:21 5 A. That is the yellow route. It is paved road. It is another
6 main road that you - it can go as far as the north. Any part of
7 the north.

8 Q. Why do you need to use four by fours on that route during
9 the rainy season?

11:57:37 10 A. The yellow route, no. The rainy season - the rainy season
11 is not being used - is being used by four-wheel drive. That is
12 what I said.

13 Q. If it is an asphalted road, why do you need to use
14 four-wheel drive vehicles on it in the rainy season? It is a
11:58:02 15 simple question.

16 A. Because it is the forest road and it is mountain to
17 mountain. So, when the rainy season - when the rain is coming
18 the road is slippery, but the green route 60 per cent of the
19 route up to Gbange is paved road more better than the yellow
11:58:27 20 route.

21 MR GRIFFITHS: Would your Honour give me a moment:

22 Q. Maybe it is my fault, Mr Witness. Do you understand what I
23 mean by asphalt? Tar?

24 A. Star?

11:58:54 25 Q. Tar, t-a-r. Do you understand what I mean by that?

26 A. What do you mean by that?

27 Q. The road is covered in tar to make it smooth for vehicles
28 to ride on, yes? Simple question now. Is the yellow route a
29 tarred road?

1 A. No.

2 Q. Thank you.

3 A. No, no.

4 Q. In effect it is a track through the jungle, isn't it?

11:59:26 5 A. No, it is not a track. The only route that you can use as
6 a track was the red one. If you use this, it gets to Fassama. A
7 vehicle can drive as far as Fassama and then the route that ends
8 on the left or the right is the track road. The red is also a
9 vehicular route but the route is not too good, but the red track
11:59:55 10 is a track road.

11 When I was deputy chief of staff of the army division, this
12 was my immediate assignment area from Bomi to Bopolu, from Bopolu
13 to Gaintown to Fassama. That was my area and I was using
14 vehicle.

12:00:16 15 Q. Don't worry, I will ask you about that in due course. But
16 you see what I - do you agree that the red route and the maroon
17 route is basically a foot track for the most part?

18 A. Vehicles were used. We use vehicles throughout as far as
19 to Fassama.

12:00:39 20 Q. But do you agree then that from Fassama to Kolahun on that
21 maroon coloured route it is merely a footpath?

22 A. That is track road. You can use with foot, yes.

23 Q. Thank you.

24 A. Yes.

12:01:00 25 Q. And the continuation of the red route from Fassama to
26 Voinjama, is that a foot track or what?

27 A. That is a vehicle road.

28 Q. Now, you see, the reason why I am asking you all the -
29 well, before I move on, there is one other question that I need

1 to ask you. When you get to Kolahun on the green route, from
2 there to Buedu on this map there appears to be a continuation of
3 the green route, doesn't there?

12:01:47 4 A. When you get to Kolahun, at five miles off Kolahun you
5 reach a junction. On the right side is going to Foya City. On
6 the left side it is a vehicle road as far as to Vahun and that
7 road can be used to come down to Monrovia also.

8 Q. Is it not the case that it is easier once one gets to
9 Kolahun to enter Guinea and re-enter Sierra Leone in order to get
12:02:14 10 to Vahun? It is quicker that way, which is the route that you
11 took when you came back, you say, with Sam Bockarie? It is
12 quicker, isn't it?

13 A. The easy way to come was through Foya, but the route I took
14 was best known to myself. I used Vahun route, because that route
12:02:38 15 if you crossed to Sierra Leone that whole area is the area that I
16 knew before the war. That is the Bomaru, Baiwala, to Pendembu,
17 to Kailahun, all these places is the area that my mother came
18 from. That is the reason why I used that route in case I
19 encountered any problem the people there would be able to
12:03:01 20 identify me, or who I will talk to. That is the reason why I
21 used that route.

22 On my way coming back, Sam Bockarie recommended that we use
23 the other route. That is the Koindu route to get to Foya City.

24 Q. Very well. The reason I am asking you these questions,
12:03:16 25 witness, is this. If we just pull the map down half-an-inch or
26 so, please, can we move the map down half-an-inch or so so that
27 we can see its title, we see that this map has been helpfully
28 titled by the OTP "RUF Main Supply Routes". Now, did you tell
29 the OTP that these were the RUF's main supply routes?

1 A. RUF had three main supply routes: this Bomaru crossing
2 from Vahun that I am talking about; then also Foya routes to
3 Koindu, Mendekoma border; and also at Foya itself there is
4 another route there going towards Customs going to Buedu
12:04:21 5 directly. Those were the three routes I knew about.

6 Q. So, help us then. Was it on your instruction that the
7 yellow line, the red line, the maroon line and the green line
8 were drawn upon this map? Did you direct the drawing of this map
9 to put those lines on it?

12:04:45 10 A. I assisted to direct the various routes that RUF were using
11 between Liberia and Sierra Leone.

12 Q. Right. Did you indicate on this map to whoever drew it
13 that these were the routes from Monrovia to the north of the
14 country on the Guinea border? Was that at your instruction?

12:05:12 15 A. If you say Guinea border, no, I didn't say so.

16 Q. Let me put the question in simple terms. Did you say to
17 whichever person was interviewing you, "Please draw a green line
18 on this map following this route, because that is the route that
19 was used to take arms to the RUF"? Did you ever say that to
12:05:38 20 anyone?

21 A. That I used to take the arms to RUF? I said these routes
22 were the routes that whenever RUF ammunition was to be taken from
23 here to Sierra Leone to supply the RUF these were the routes that
24 they used. I said it.

12:06:03 25 Q. So, you were the person responsible for these lines being
26 drawn on this map. Not that you physically drew them, but it was
27 as a result of what you said to the OTP that they were drawn. Is
28 that right?

29 A. This drawing was drawn by my advice. I showed the routes.

1 I told them that these were the very routes that the RUF used
2 from Sierra Leone to Liberia and from Liberia to Sierra Leone. I
3 particularly advised them because I was sure of it and I showed
4 them the various routes that they used.

12:06:51 5 Q. I need to be a bit more particular. Were you intending
6 when you transmitted this information to the OTP to show what are
7 the basic means to get from Monrovia to Kolahun, or were you
8 saying to the OTP, "These were the routes that were used to take
9 arms to the RUF"? Which of those two was your intention?

12:07:23 10 A. What do you mean by OTP?

11 Q. Office of the Prosecutor; i.e. the people sitting on the
12 other side of this courtroom.

13 A. I said these routes were being used when arms were taken
14 from Mr Taylor to supply the RUF. When we were drawing these
12:07:47 15 routes, those were the things I said.

16 Q. Very well. So, let me ask you this then. Would you agree
17 that what you have drawn, putting the RUF totally out of your
18 mind, that these are the routes from Monrovia to Kolahun? So, if
19 I was wanting to take a sack of potatoes from Monrovia to
12:08:07 20 Kolahun --

21 THE INTERPRETER: Your Honours, your Honours, the
22 interpreter in the Liberian Krio booth is reporting that counsel
23 is going too fast for his pace.

24 THE WITNESS: You can use the green route --

12:08:30 25 PRESIDING JUDGE: Witness, the lawyer has to repeat his
26 question slowly because this is what the interpreter requested.
27 Then you can answer afterwards.

28 MR GRIFFITHS:

29 Q. I did promise I would go at a pace that you could follow

1 and so it is my fault. So, let me ask you the question again.

2 Let us for a moment, please, put the RUF out of our minds, okay?

3 Do you follow me? So, you are a green grocer in Monrovia and you

4 want to transport a sack of potatoes to Kolahun. The routes we

12:09:09 5 see on these maps you would have to take one of those, wouldn't

6 you?

7 A. I would take the green route and end up with the yellow.

8 Q. Because the fact of the matter is whether on foot or in a

9 vehicle those are the routes that take you from Monrovia to that

12:09:33 10 part of the country, would you agree?

11 A. The reason that you would take either the maroon or the red

12 is because when this yellow and green, the track is there and you

13 will use either the maroon or the red. That is the reason why

14 you would use that.

12:09:56 15 Q. But what I am trying to get at, you see, witness, is this.

16 That irrespective of any war, these are the routes available for

17 anyone wanting to travel from Monrovia to Kolahun, aren't they?

18 A. The road that is available, good road, is the green and the

19 yellow.

12:10:23 20 Q. If you were desperate you could also use the red and the

21 maroon, yes?

22 A. Let me tell you something. Vahun falls in the district of

23 Kolahun District. If you are going to Vahun, you either use a

24 yellow - why will you use the green? You go to Voinjama and you

12:10:48 25 come to Kolahun before you branch back to Vahun.

26 Q. I am not disputing that, but I am simply trying to get to a

27 basic issue that effectively this is a road map of Liberia.

28 Would you agree?

29 A. It is not a road map. It is a vehicle road. The yellow

1 road is the vehicle road. This yellow route is the trailer road
2 where the big, big trailers are using. It is a logging company
3 road much more better. Only in the rainy season it looks
4 badder(sic). If it is dry season, it is even much better than
5 the coal tar.

12:11:28

6 Q. Perhaps we are at cross-purposes, witness. The simple
7 point I want to get at is this. If we took the three small
8 letters "RUF" off this map, what we would have is a basic main
9 route map of Liberia, wouldn't we?

12:11:51

10 A. The number one road map is the green map, I can say. It is
11 much better than when used, but not when you are going to Vahun
12 area. If you are going to Vahun area, you can also use the green
13 or yellow route.

12:12:16

14 Q. I think I have made my point, witness, and so I am going to
15 move on. Now I want to, using your life as a timeline, look at
16 certain major dates in the history of that part of the world in
17 the late 1990s/early 21st century, all right? Do you follow me?

18 A. Yes.

12:12:54

19 Q. Now, help us first of all with this please. If you turn to
20 page 115 in this bundle --

21 A. 115?

12:13:37

22 Q. Yes. This is a record of an interview conducted with you
23 on two days in July 2007. It took place in a witness preparation
24 room, July 2007 mind you, and present in that witness preparation
25 room with you was Brenda Hollis, the learned counsel who examined
26 you, and a Joseph Saffa. Is that right? Do you see that at the
27 top of the page?

28 A. I am seeing it.

29 Q. What I am interested in at this stage, though, is what is

1 at the bottom of the page. Now we know, because you earlier
2 confirmed this, that you were born in June 1968. Do you remember
3 agreeing with me on that?

4 A. I said 7 June.

12:14:20 5 Q. Yes, 1968?

6 A. Yes.

7 Q. If we look at the bottom of this page, we see that you say
8 between the ages of 5 and 15 you lived in Voinjama, the primary
9 family residence, is that right?

12:14:39 10 A. Yes.

11 Q. Which means that, given that you were born in 1968, when
12 you were 15 that would be 1983, would you agree?

13 A. Yes, if you are the one calculating it because I am not the
14 one calculating it.

12:15:03 15 Q. Very well. Turn over the page now, shall we?

16 A. The first one.

17 Q. Yes. Over the page you say this: between the ages of 15
18 and 17 years you were in Kakata attending school and then in 1990
19 when you were in the 12th grade you heard that the NPFL was
20 approaching and so you ran away. Were you still at school when
21 you were aged 22?

12:15:33

22 A. I was still in school.

23 Q. You see according to this, at age 17 that would be 1985,
24 but you told us in evidence yesterday, and you say here, that it
25 was 1990, when you were 22 years old, that you were forced to
26 flee from school because the NPFL was coming. So, when was it
27 that you were forced to flee? Do you follow me?

12:15:57

28 A. In 1990 I was in Kakata attending school. When the war was
29 coming the war reached as far as Salala area, Salayea area,

1 Salala area, when the entire Kakata -- everybody started running,
2 including myself and the rest of the other people who went to
3 Monrovia.

12:16:47 4 Q. Let us move this on, shall we? At age 17, given a birth
5 date of 1968, that takes us to 1985, so if you were still at
6 school in 1985 that means there is a missing five years between
7 1985 and 1990 when the NPFL --

8 A. I can explain that to you.

9 Q. Please do.

12:17:13 10 A. I left the school to learn Arabic, so I left the school to
11 learn Arabic in Kakata. Then later I continued my schooling.

12 Q. And so for five years between 1985 and 1990 you were
13 learning Arabic?

12:17:50 14 A. No, no, I do not remember the actual year about all of
15 these things we are talking about, but I dropped from school and
16 I went to learn Arabic and later I went back into English school.
17 That I can tell.

18 Q. So, you are saying to us that you were still at school aged
19 22 when the NPFL arrived?

12:18:10 20 A. I was in school, St. Christopher junior and senior high
21 school, Kakata.

22 Q. And you were 22 at the time?

23 A. I don't know whether it was 22 now, or how old I was at
24 that time. I cannot remember because I did not do - I am not
12:18:32 25 doing that calculation right now. I was in school when the NPFL
26 came as far as - close to Kakata.

27 Q. 68 plus 22 equals 90. You would have been 22 in 1990. Do
28 you agree with that? It is a simple matter.

29 A. No, no, no.

1 Q. You don't agree with that?

2 A. No.

3 Q. So, do you say you were younger or older when this
4 occurred?

12:19:04 5 A. I was old.

6 Q. How old?

7 A. I cannot tell. From that time up until now we have been
8 concentrating on war throughout. I do not even remember some of
9 the years you are just explaining now. Myself I sat down, I look
10 at document before I can identify or this was the year I was
11 doing this, or this was the year, because I have documents to all
12 of these. I cannot remember. It has taken a long time now.

12:19:21

13 Q. I can well understand that, but you have lived in the same
14 body for the last 39 years, which is why I am asking you how old
15 you were when the NPFL arrived? It is a simple question.

12:19:46

16 A. I do not remember from the year, but I have my birth
17 certificate document, I have everything, but the only thing I can
18 tell you was that I was staying in Kakata attending school when
19 the NPFL came closer to - and I left for Monrovia.

12:20:23

20 Q. And, of course, you say on page 116, to which I return,
21 that you fled first to Monrovia, is that right?

22 A. Yes.

23 Q. Where you lived for a while in Chocolate Town where your
24 father had a home, is that right?

12:20:47

25 A. Gardnersville, Chocolate City, not Chocolate Town.

26 Q. Very well. So, in any event that was the first time you
27 had had to flee because of the NPFL, is that right?

28 A. Yes.

29 Q. But then there came another occasion when you had to flee

1 because of the NPFL and you ended up fleeing from Monrovia to
2 Voinjama, didn't you?

3 A. Yes.

4 Q. And so that was the second time that the NPFL had caused
12:21:25 5 you to have to run away.

6 A. When we heard that the war had entered Kakata then I
7 decided to leave for Monrovia straight for Voinjama.

8 Q. So it was because of the NPFL.

9 A. Yes, yes.

12:21:35 10 Q. So that was the second time?

11 A. Yes, yes.

12 Q. In any event, you are going to Voinjama, the ancestral
13 home, and once again you are forced to flee because of the NPFL,
14 aren't you?

12:21:56 15 A. Yes, we used the route from Monrovia to Bomi Hills, to
16 Bopolu, to Fassama. On the right side you get to Salayea and go
17 to Zorzor and then to Voinjama. That was the only route
18 available at that time. You cannot use the other main road.
19 They all were blocked and so we were in Voinjama for a month when
12:22:20 20 we heard that NPFL had entered Zorzor and then I left from there
21 also.

22 Q. Thank you for your helpful description of your journey, but
23 in any event that was the third time they had caused you to flee,
24 is that right?

12:22:37 25 A. Yes.

26 Q. And then lo and behold, for a fourth time you were forced
27 to flee to your - across the border to Sierra Leone to your
28 mother's home near Bomaru, weren't you?

29 A. Close to Bomaru.

1 Q. That was the fourth time that the NPFL had caused you to
2 flee.

3 A. Yes.

12:23:09

4 Q. And even there in the bosom of the heartland of your
5 mother's home you were forced to flee again to a refugee camp
6 in Kenema, weren't you?

7 A. Yes.

12:23:29

8 Q. And help us with this, from the first occasion when you
9 were caused to flee to Monrovia until you ended up in the refugee
10 camp in Kenema, how long are we talking about?

11 A. That was up to the ending of 1991.

12 Q. And that whole process, did it last several months, a
13 matter of weeks, or what?

14 A. It lasted some time, more than a month.

12:23:54

15 Q. More than a month. So, for something in excess of a month
16 effectively you were virtually constantly on the run from the
17 NPFL, would you agree?

18 A. All that running, I was running away from NPFL.

12:24:20

19 Q. Yes, with the consequence that by the time you ended up in
20 that refugee camp in Kenema you hated the NPFL, didn't you?

21 A. Oh, yes.

22 Q. And you hated the leader of the NPFL, didn't you?

23 A. Yes.

24 Q. Who was the leader of the NPFL at that time?

12:24:44

25 A. Mr Taylor.

26 Q. And it is because of that hatred, was it not, why,
27 returning to page 16 of this document, middle paragraph page 116
28 - 116. My fault, your Honour.

29 A. Where is this?

1 Q. 116?

2 A. Okay.

3 Q. And it is because of that hatred why we see there you told
4 the Prosecutor, "In 1992 I became one of the first members of the
12:25:29 5 Liberian United Defence Forces, LUDF." That is right, isn't it?

6 A. That was not the reason. The reason was I have been pushed
7 against the war. The war entered into Kakata when I left to go
8 to Monrovia and they forced me out of Monrovia to Voinjama and
9 they forced me out of Voinjama to get to the village of my

12:25:57 10 mother's home and that is the next [indiscernible] it was not
11 even in Liberia again and he forced me from my mother's village
12 to Kenema. At that time I was not prepared to go back.

13 Q. You were, at that stage, prepared to fight because you felt
14 your back was against the wall, is that right?

12:26:16 15 A. Yes.

16 Q. You felt in that position that you had every right to take
17 up arms against the NPFL, is that right?

18 A. I wanted to go back home. Whether it was right or not
19 right, what I know I have been pushed against the wall and I want
12:26:38 20 to go back.

21 Q. Help us with this, given that in due course you rose to a
22 high position within ULIMO, who armed, funded and supported the
23 LUDF?

24 A. Sierra Leone government.

12:26:58 25 Q. And just help us, were they providing you with arms?

26 A. They provided arms for us.

27 Q. Did they provide you with uniforms?

28 A. Yes.

29 Q. Did they provide you with ammunition?

1 A. Yes.

2 Q. Did they provide you with food?

3 A. Yes.

4 Q. And just so that we understand the situation, here you

12:27:27 5 were, a Liberian national in Sierra Leone, being funded by the
6 Sierra Leonean government to fight against a force from Liberia,
7 is that right?

8 A. No, that was not the instruction. The instruction from the
9 Sierra Leonean government was to help the Sierra Leonean

12:27:53 10 government to push the NPFL and the RUF from their territory, but
11 we had our own agenda. When we got to the border we cross on our
12 own because we had wanted to come back home.

13 Q. So, what was the purpose of the LUDF?

14 A. Liberian United Defence Force. The Liberians uniting to
12:28:24 15 defend themselves to go back home.

16 Q. Sorry, my fault. Continue, because you had not finished
17 your answer. I apologise for interrupting you.

18 A. I have finished.

19 Q. Thank you very much. Now, the LUDF lasted for about six
12:28:51 20 months, didn't it?

21 A. Yes.

22 Q. And then it became ULIMO?

23 A. Yes.

24 Q. Was ULIMO, in its initial form when it transformed from the
12:29:05 25 LUDF, was it still being supported by the Sierra Leonean
26 government?

27 A. Please repeat that question again.

28 Q. When the LUDF became ULIMO, was it still being supported by
29 the Sierra Leonean government?

1 A. Yes. I said yes.

2 Q. Yes, I am looking at my notes. Now, ULIMO, in its new form
3 having changed from LUDF, what was the purpose of ULIMO?

12:30:06

4 A. The organisation was expanding. We had Al Hadji GV Koroma
5 who came from Guinea. He wanted to organise his own group and
6 the Sierra Leonean government said no, "If all of you people are
7 Liberian, you are fighting for the same goal: to go back home.
8 You can put everything together and make it one organisation."
9 That is what all of us decided to become one and form ULIMO.

12:30:30

10 That was how ULIMO came about.

11 Q. So, in its initial phase ULIMO was made up of the remnants
12 of the LUDF and forces which had come from Guinea?

12:31:01

13 A. Man power came from Guinea, but that LUDF that you are
14 talking about, men came from Guinea and men came from Sierra
15 Leone also.

16 Q. So, within ULIMO we had Guinean nationals, Sierra Leonean
17 nationals and Liberian nationals, is that right?

12:31:29

18 A. I know about Liberian nationals at that time. I did not
19 know about any Guinean national, or Sierra Leonean national. The
20 Sierra Leonean nationals that worked alongside ULIMO, but they
21 never cross, but some Sierra Leoneans were among the ULIMO, but
22 they stop because when we were crossing to Liberia the ULIMO was
23 still existing in Sierra Leone for a longer period of time.

12:31:58

24 Q. Now, following its formation, ULIMO had a great deal of
25 success against the NPFL, didn't it?

26 A. Can you repeat that?

27 Q. Following its formation, ULIMO had a great deal of success
28 against the NPFL and the RUF, didn't it?

29 A. Yes, yes.

1 Q. Because at several levels, because of Sierra Leonean
2 support, you were better equipped than them, weren't you?

3 A. I don't know what equipment the NPFL had at that time, but
4 we were equipped.

12:32:38 5 Q. You were well equipped?

6 A. Yes, we were equipped.

7 Q. With what were you equipped?

8 A. Ammunition that were provided for us to go to the battle
9 front and we were succeeding, so we were equipped.

12:32:57 10 Q. Did you have, for example, helicopter support?

11 A. No.

12 Q. Did you have logistical support in terms of trucks carrying
13 ammunition to you and the like?

14 A. Yes.

12:33:16 15 Q. Did you have artillery?

16 A. Yes.

17 Q. Who provided that artillery?

18 A. The Sierra Leonean government. The leader at that time was
19 Joseph Saidu Momoh.

12:33:32 20 Q. Did you have RPGs?

21 A. I had all that.

22 Q. And all of it was supplied by the Sierra Leonean
23 government?

24 A. Yes.

12:33:48 25 Q. Now, you would agree that at that time you felt that ULIMO
26 was fighting both against the RUF and against the NPFL?

27 A. Yes.

28 Q. And it wouldn't surprise you if, as a consequence of that,
29 there was co-operation in 1991/1992 between the NPFL and the RUF?

1 A. Could you please repeat that?

2 Q. It would not surprise you that during that critical period,
3 1991 to 1992, because you were fighting against the two of them
4 there was co-operation between the RUF and the NPFL?

12:34:42 5 A. No, not that. The RUF and the NPFL were existing before
6 the further forces were formed.

7 Q. At that stage it would not surprise you that there was some
8 co-operation between the two because they were both fighting
9 against you, weren't they?

12:35:05 10 A. It would not surprise me. It did not surprise me. I knew
11 that they were co-operating and they had been co-operating and
12 they would still co-operate.

13 Q. Now, we are still dealing with your timeline and we have
14 got to the stage where you have - LUDF has become ULIMO and we
12:35:34 15 have dealt with the early successes of ULIMO. I now want to
16 interject another date. In 1990, do you recall that ECOMOG
17 entered Liberia?

18 A. Yes.

19 Q. And they were to remain in Liberia until the year 2000?

12:36:03 20 A. Yes.

21 Q. And they were to remain in Liberia until the year 2000,
22 that was until the last arms were burnt in Liberia. That is
23 right, isn't it?

24 A. Yes.

12:36:19 25 Q. And many of the weapons recovered from former combatants
26 were destroyed as part of that process, weren't they?

27 A. Will you repeat that.

28 Q. Weapons recovered from former combatants were destroyed by
29 burning, weren't they?

1 A. Yes, yes.

2 Q. Now, we will come back to ECOMOG in a moment, but can we
3 now, please, return to your life. Can we please turn to page 95
4 in that bundle, please. On page 95 of this bundle we see that on
12:37:29 5 10 and 13 of November in the year 2006, in Monrovia, Liberia, you
6 were interviewed by two individuals: Alain Werner and Janet
7 Tommy, is that right?

8 A. Yes.

9 Q. During course of that interview, as we see under the
12:37:56 10 subheading "Further Clarification", you stated that you rose to
11 the rank of a battalion commander within ULIMO in 1992, is that
12 right?

13 A. Yes.

14 Q. Now, your bodyguard commander at that time was called
12:38:16 15 Ansumana Kamara, wasn't he?

16 A. My bodyguard at that time as commander, bodyguard
17 commander?

18 Q. Yes, that is right?

19 A. Okay, yes, yes.

12:38:40 20 Q. Why was it so difficult to answer that?

21 A. You know the brain is not a computer. Some of the things,
22 you know, from 1990 up to this moment I am just trying to reflect
23 my memory back, but it is not something - you cannot say
24 everything is in my head.

12:39:03 25 Q. How long was he your bodyguard commander?

26 A. I cannot even remember the Ansumana Kamara again, but I had
27 an Ansumana Kamara who was amongst my battalion, that is why I
28 answered yes.

29 Q. Was he your bodyguard commander?

1 A. No, but I knew one Ansumana Kamara what was in my my
2 battalion.

3 Q. The name is spelt A-N-S-U-M-A-N-A, separate word,
4 K-A-M-A-R-A. Now, do you recall Mr Kamara?

12:39:56 5 A. I can remember Mr Ansumana Kamara.

6 Q. Do you recall him as being a truthful man?

7 A. I said I can remember the name Ansumana Kamara, but
8 presently where I seated I can't say I know him. I don't know
9 him.

12:40:21 10 Q. Let us see if you can try and assist us. The Ansumana
11 Kamara who was in your battalion, do you recall him as being a
12 truthful man?

13 A. I said no, I don't remember his attitude, what he did, or
14 what he was doing in the battalion. At this moment all of those
12:40:47 15 have slipped off my memory now.

16 Q. Let me put my question differently. Given that you were
17 comrades in arms, is he a man you would trust?

18 A. I said no, because right now I don't remember him.

19 Q. Now, we know, and I am continuing with the timeline now,
12:41:22 20 that in 1992 ULIMO invaded Liberia, is that right?

21 A. ULIMO entered Liberia.

22 Q. Why?

23 A. The Liberians that had been pushed against the wall and
24 wanted to go back home.

12:41:55 25 Q. Did you want to kick the NPFL out of Liberia?

26 A. No, we wanted to go back to our various homes.

27 Q. Did you want to take over and run the country?

28 A. No.

29 Q. So, just so that I understand what it is you are telling

1 us, the sole purpose of all those men, and no doubt women,
2 fighting for ULIMO was to go back home, is that right?

3 A. They all wanted to go back home.

4 Q. And that is the only reason why they were fighting?

12:42:41 5 A. Yes.

6 Q. Now, I am going to ask you another question now in relation
7 to ULIMO and it may assist you to turn to page 118.

8 A. Page 1?

9 Q. 118. Do you have it?

12:43:21 10 A. Yes.

11 Q. Look at the paragraph two lines down, five letters from the
12 right of the page do you see:

13 "It was easy for ULIMO, comprised mainly of Mandingos and
14 Muslims, to get assistance from Guinea, in terms of arms and
15 ammunition, to fight against the Taylor's forces."

12:43:41

16 Was that right?

17 A. Please repeat it.

18 Q. Can you follow it on the page, please. The second
19 paragraph on that page, two lines into that paragraph, to the
20 right of the page do you see the words, "It was easy". Do you
21 see it?

12:44:00

22 A. Read it.

23 Q. "It was easy for ULIMO, comprised mainly of Mandingos and
24 Muslims, to get assistance from Guinea, in terms of arms and
25 ammunition, to fight against the Taylor's forces."

12:44:19

26 And my question is this: when you told the Office of the
27 Prosecutor that, on 16 and 17 July 2007, you told Ms Hollis
28 herself, were you telling the truth?

29 A. I was telling all the truth.

1 Q. Just so that we get the full picture now, LUDF was funded,
2 armed and supported by Sierra Leone and here we have, at the time
3 of the invasion into Lofa County, ULIMO is funded and supported
4 by Guinea is that right?

12:45:14 5 A. No.

6 Q. Well, explain to us then, please, because I am sure it is
7 my fault.

8 A. ULIMO received assistance from Guinea, but it was organised
9 and supported from Sierra Leone, but when ULIMO goes to Lofa area

12:45:35 10 ULIMO received some support from Guinea. Do you get it clear?

11 Q. I think I have got it now, but just let me see if I
12 understand. Initially, when it is the LUDF, Sierra Leone was
13 supporting it. Even when it changed to ULIMO, Sierra Leone
14 continues its support. Once the ULIMO took over Lofa County you
15 began getting support from Guinea, is that right?

12:46:02

16 A. Yes.

17 Q. So at various stages during its transition from LUDF to
18 ULIMO, two adjoining governments were supporting ULIMO?

19 A. The ULIMO that were in Sierra Leone were supported by
20 Sierra Leonean government, but the Sierra Leone government did
21 not support ULIMO inside Liberia. What were we doing? We
22 divided our troop into two. Whenever Sierra Leone gave us
23 support to fight a war in Sierra Leone we used the same
24 ammunition to cross into Liberia and fight against the NPFL.

12:46:32

25 Q. Right. And help us with this. Coming from a military
26 background as you do, you should be able to assist me with this.
27 If one is to mount an invasion against a country, you need to
28 create a stock pile of arms, don't you?

12:46:53

29 A. What do you call invading? We didn't invade. When ULIMO

1 entered to go back home we were also getting arms and ammunition
2 from NPFL. I want you to remember that. They had a lot of
3 support also. Whenever we captured certain areas, even like Bomi
4 Hills area to Teani area, all of those places we got ammunition
12:47:47 5 from there. So, our support was not only limited to what we got
6 from Sierra Leone because what we got from Sierra Leone we
7 divided into two, because Sierra Leone was not giving us all the
8 arms and ammunition to go into Liberia to fight with them, but we
9 were also using our own strategies. When we were given like five
12:48:10 10 bags, we will use like - when we were given ten bags we will use
11 five bags in Sierra Leone and the other five bags we will cross
12 with them into Liberia and use them there. That is how we
13 operated.

14 Q. Let me try my question again and I will use a neutral word
12:48:27 15 instead of invade this time. If one is commanding an armed force
16 intending to cross a border, whether to go home or whether to
17 conquer, you need to stock pile weapons, don't you?

18 A. That is true.

19 Q. Who provided the stock pile for ULIMO?

12:49:03 20 A. We had leaders who we were dealing with. The ULIMO had the
21 former ambassador at that time, Albert Capay [phon] until in 1991
22 when he died in Kenema. Also Amajudo was the all over field
23 commander. We had Al Hadji Koroma who was based in Conakry. So,
24 how they were amassing the arms and ammunition, or what they were
12:49:35 25 doing, or what they where are not doing, we had a battalion
26 commander who received instructions from them and what we get
27 from them I implement it.

28 Q. But following the crossing of the border, you were
29 appointed a field commander, weren't you?

1 A. Battalion commander.

2 Q. No, sorry. You told - would your Honours give me a moment?

3 So you were never a field commander?

4 A. I was. I was field commander in Liberia after we opened

12:51:11 5 Paul River to Monrovia.

6 Q. My fault. Now, in fact, having joined LUDF in 1990 you

7 remained in ULIMO until 1997, didn't you?

8 A. Yes.

9 Q. And I wonder if we could have MPF-1 put on the screen,

12:51:51 10 please. That is the map again.

11 PRESIDING JUDGE: MFI-1.

12 MR GRIFFITHS: MFI-1, my fault. Again, can we magnify it

13 such that we can see the whole map. Now, yesterday during the

14 course of your account, you explained to us the various locations

12:52:18 15 which were captured by ULIMO after they crossed the border, yes?

16 Did you capture Lofa Bridge?

17 A. Yes.

18 Q. Did you capture Tubmanburg?

19 A. Yes.

12:52:40 20 Q. What about Bopolu?

21 A. Yes.

22 Q. What about in the middle of the page Fassama?

23 A. Yes.

24 Q. Did you capture Koluhun?

12:52:56 25 A. Yes.

26 Q. Did you capture Zorzor?

27 A. Yes.

28 Q. Indeed you captured as far west on this plan as Gbange,

29 didn't you?

1 A. What do you call west of Gbange?

2 Q. West because on this page it is east. As far east as
3 Gbange, is that right?

12:53:27

4 A. You have got the call the place name to me and then I will
5 understand.

6 Q. Do you see - find Kakata, yes?

7 A. Yes, we also captured Kakata.

8 Q. Did you capture Careysburg?

9 A. No.

12:53:48

10 Q. What about, and I hope I pronounce this correctly, Gbatala?

11 A. No.

12 Q. What about the town just above that, is that pronounced
13 Gbarnga?

14 A. We captured Gbarnga. Later we retreated.

12:54:08

15 Q. And later you retreated as part of the peace accord, yes?

16 A. Yes.

17 Q. Now, can you help us with this. At its greatest extent
18 could you use a pen and just trace on that map, please, the
19 furthest extent of ULIMO's control of this part of Liberia.

12:54:35

20 Start at the bottom on the Atlantic coast, pick a point on the
21 coast to begin and then just draw the line for us, please?

22 A. Yes, can we get a map of Liberia? Let me do this quickly.

23 MS HOLLIS: I would not like to have our exhibit used to be
24 marked other than ---

12:54:55

25 MR GRIFFITHS: No, I am not asking him to mark it. I am
26 just asking him to use the end of the pen to indicate the
27 boundary of the territories occupied by ULIMO at its furthest
28 extent.

29 A. I want to use the Liberian map. We have to use a Liberian

1 map, the map of Liberia.

2 PRESIDING JUDGE: Mr Griffiths, could we have MFI-2 on to
3 the screen, please, and I think in view of the time you will find
4 an appropriate place, Mr Griffiths, for an adjournment.

12:55:33 5 MR GRIFFITHS: I will do, your Honour, yes.

6 THE WITNESS: ULIMO came from Sierra Leone, most through
7 Zimmi. ULIMO entered from Zimmi to Bo Waterside. ULIMO used
8 from upper Zimmi Mano River Congo and Bo Waterside we entered
9 into Cape Mount. That is the first county. Later we got to
10 Bomi, Bomi County. That is Tubmanburg. We also got to Bopolu
11 and we got to Lofa. We also cross from Bomi, to Bopolu, to Bong
12 mines. There is a crossing point off the road there you can use
13 there from Bomi Hills and into Bopolu to get to the Bong mines.
14 I used the route from Bong mines to attack Kakata and later we
12:56:54 15 retreated from Kakata. The control we were having, these are the
16 places: Cape Mount, Bopolu, Lofa, part of Margibi. That is what
17 I said yesterday.

18 MR GRIFFITHS: Your Honour, can I suggest this as a
19 possible way of short circuiting this. I have the identical map
12:57:17 20 and so that we don't corrupt the original exhibit, could I ask
21 the witness to draw a line on this copy showing the extent of
22 ULIMO gains in Liberia? Do you follow me? I want you to draw a
23 line on the map as if you are creating another frontier, on this
24 map that I am going to give you.

12:57:43 25 PRESIDING JUDGE: Is it possible to give the witness a felt
26 tip pen of a different colour than black to indicate on this
27 other map?

28 MR GRIFFITHS: I have got one here.

29 MS IRURA: Your Honour, would the document be marked for

1 i d e n t i f i c a t i o n .

2 PRESIDING JUDGE: After he has indicated something on it.

3 MR GRIFFITHS: Do you follow what I am asking you to do,
4 witness?

12:58:20 5 A. This is the Kenema, very close to Kenema we had the base,
6 ULIMO base, that was the headquarters established. We travelled
7 from there. Also we had the other troops at Potoru to come to
8 Zimmi. We also had Jeru before coming to Zimmi. Where is Zimmi?
9 Zimmi. Okay, we enter Cape Mount. We entered Cape Mount, Bo and
12:59:03 10 Bombomtala Salamu that is now - but all over Cape Mount we
11 entered three locations, the upper side we call it Mano River
12 Kongo, to enter into Cape Mount. This is the first county we
13 landed in Liberia. From there ULIMO advanced to Bomi, Tubmanburg
14 and also Bopolu, Lofa County, part of Margibi that is the Bong
12:59:34 15 mine I was talking about, parts of Margibi, Bong mine as far as
16 to Kakata. ULIMO reached to Kakata and later retreated. Those
17 are the places.

18 Q. You know that dotted line you were just drawing then, can
19 you just make that a bold line. The one that you were drawing
12:59:56 20 then. Just now before you finish, just draw a line.

21 PRESIDING JUDGE: Perhaps, counsel, instead of directing
22 the witness to simply join up the dots, you could put the
23 question again to him clearly so that he knows what this line
24 represents.

13:00:11 25 MR GRIFFITHS: I want you to draw a line on this map
26 representing the furthest extent of ULIMO's control within
27 Liberia.

28 A. That is what I want to find some of the places we went
29 there and later we retreated from there. Do you want me to

1 include all that, or where ULIMO actually had the control.

2 Q. Where ULIMO actually had control. Just draw a line,
3 please.

4 A. Okay.

13:00:46 5 PRESIDING JUDGE: I think the witness asked a good question
6 for clarification. He asked do you want him to demarcate the
7 area where ULIMO went and retreated from, or simply the areas
8 where they held on to the territory after retreat.

9 MR GRIFFITHS: And as I explained to him, your Honour, it
13:01:02 10 is the latter that I want and then we can talk about the former
11 later.

12 A. If the territory - you are talking about the territory
13 there is three counties: Cape Mount, Bomi and Gbarpolu - Cape
14 Mount, Bomi Gbarpolu and Lofa. Because bar follow was created by
13:01:30 15 Mr Taylor that makes it four.

16 PRESIDING JUDGE: So, Mr Witness, are you able to draw or
17 encircle this area of control that you have just mentioned on
18 this map?

19 MR GRIFFITHS: Thank you very much. Would that be a
13:02:05 20 convenient point, your Honour?

21 PRESIDING JUDGE: Would you like this document marked for
22 identification?

23 MR GRIFFITHS: Yes, please.

24 PRESIDING JUDGE: Madam Court Manager, I am not sure what
13:02:14 25 MFI number we are up to?

26 MS IRURA: Your Honour, this would be MFI-7.

27 PRESIDING JUDGE: Then let the map be marked MFI-7 and we
28 shall adjourn the proceedings until 2.30. Mr Witness, you are
29 not to discuss your testimony until then. Thank you.

1 [Lunch break taken at 1.00 p.m.]

2 [Upon resuming at 2.30 p.m.]

3 PRESIDING JUDGE: Good afternoon. I notice Ms Hollis is on
4 her feet.

14:27:58 5 MS HOLLIS: Yes, your Honour. May I please note that
6 Christopher Santora has joined the Prosecution this afternoon.

7 PRESIDING JUDGE: So noted. Welcome Mr Santora.

8 Mr Griffiths, you are continuing with the cross-examination
9 of the witness.

14:28:14 10 MR GRIFFITHS: [Microphone not activated].

11 PRESIDING JUDGE: Is something the matter with our screen?
12 Why are we looking at the back of our computers?

13 MR GRIFFITHS: You should have up a copy of the map that
14 the witness marked just before the luncheon adjournment. We
14:28:37 15 have.

16 PRESIDING JUDGE: Why are we looking inside the public
17 gallery on the screens? Is that what everybody has on their
18 computers?

19 MR GRIFFITHS: [Microphone not activated]. We have the
14:29:04 20 map.

21 PRESIDING JUDGE: Okay, things have been adjusted properly.
22 Please continue, Mr Griffiths.

23 MR GRIFFITHS: I am grateful.

24 PRESIDING JUDGE: The map on the screen is MFI-7?

14:29:18 25 MR GRIFFITHS: The one marked by the witness just before
26 the luncheon adjournment.

27 I have asked for this map to be put up because I want to
28 ask you one or two more questions about this.

29 MS MUZIGO-MORRISON: Counsel, please could you turn your

1 microphone on.

2 MR GRIFFITHS: Sorry. I have asked for the map to be put
3 up because now that you have delineated the area of Liberia with
4 which we are concerned I want you to help us with one or two
14:29:57 5 matters. Now, to assist us with that could you turn to page 117
6 in that bundle, please, and your Honour I am helpfully told by
7 Ms Hollis that I should also quote the stamped number at the top
8 for the purpose of the record, which is 00039962.

9 As we saw from the map, this is right, isn't it, the area
14:30:54 10 you were in control of as ULIMO was all that area adjacent to the
11 Sierra Leone border. Would you agree?

12 A. You mean on the map?

13 Q. The effect, and we don't need to look at the map, but the
14 effect of ULIMO controlling the area you drew on the map was that
14:31:27 15 ULIMO had total control of the Sierra Leonean/Liberian border,
16 didn't they?

17 A. ULIMO were controlling three front lines, one route was
18 coming from Pujehun District. Also joining to Zimmi. The other
19 was Zimmi and another from Mano River Kongo.

14:32:10 20 Q. Very well, let me put it differently to you then because
21 I am anxious to move on. If we look at page 1177, 39962, the
22 second paragraph on that page reads as follows:

23 "In 1993 ULIMO got total control over Lofa County, but from
24 1993 to 1996 they were fighting on two fronts as they were
14:32:37 25 engaged in fighting against the NPFL and at the same time against
26 the RUF who were coming into Liberia and attacking them from the
27 rear."

28 This is the important part:

29 "During this period until after the presidential elections

1 in Liberia the RUF never had free access to NPFL as ULIMO was in
2 between them."

3 That is right, isn't it?

4 A. The RUF had access.

14:33:12 5 Q. Why did you tell the Office of the Prosecution, that is
6 Ms Brenda Hollis, on 16 and 17 July 2007, that the RUF never had
7 free access to the NPFL?

8 A. The free access RUF never had, but they never had the free
9 access that they used to have, but the remanence of NPFL were
14:33:47 10 still deep in the forest, still coordinating RUF and the NPFL.

11 Q. Help us, please, why didn't you say what you have just told
12 us to Ms Hollis in July of last year? Why did you say the RUF
13 never had free access to the NPFL?

14 A. This thing is a story. The story is that when you take it
14:34:22 15 from your head, that moment what comes out of your head is what
16 you say and maybe I can say something today and then tomorrow
17 something else comes to my memory and then I will have to say it
18 and I have to tell you this thing has taken over 18 years. My
19 brain is not a computer. Something I can explain today, maybe
14:34:44 20 the next day I will think of some other things that happened and
21 then I will have to explain that again. ULIMO had control of
22 Lofa County, but deep in the forest the NPFL were still there in
23 the deep forest, still coordinating the RUF and the central area
24 Gbarnga.

14:35:06 25 Q. I appreciate what you have told us about a story, but I am
26 interested in fact and not fiction. What did you mean when you
27 told the Office of the Prosecutor the RUF never had free access
28 to the NPFL? What did you mean?

29 A. I meant - when I said RUF never had free access, that is

1 when NPFL was controlling Lofa, the RUF had access to Gbarnga.
2 They could use vehicles to transport the ammunition to Sierra
3 Leone, but now ULIMO broke through them and ULIMO was in control
4 of Zorzor, Voinjama, Kolahun, Foya, so RUF never had access for
14:35:52 5 using vehicles from Gbarnga area to Sierra Leone. That was what
6 I meant that RUF never had access. Do you get it clear?

7 Q. Let me see if I can make it clear. When you drew that line
8 on the map, what were you seeking to indicate?

9 A. It is indicating that those were the controlled areas of
14:36:24 10 ULIMO, but let me make something clear to you: this was guerilla
11 warfare. You can have control of the area and another faction
12 can bypass you from another location and then launch an attack
13 against you, so when ULIMO had control of areas the NPFL will
14 still use those areas, bypass, and then do something in that
14:36:51 15 area. Equally so ULIMO also had access by passing to attack
16 Nimba. That happened, so when I said ULIMO had control of Nimba,
17 or Gbarnga, I can say we were in Gbarnga for two months up to
18 three months and then we retreated back, but I would not have
19 drawn the map that kind of way. Those areas we had total control
14:37:15 20 over is what I drew the map for, so I can say that NPFL could
21 also have access to get into the forest and reach the area of
22 RUF.

23 Q. What I suggest is that ULIMO were effectively, for that
24 period, a buffer between the NPFL and the Sierra Leonean border.
14:37:42 25 That area was controlled by ULIMO and effectively you were
26 telling the Prosecutor the truth back in July of last year when
27 you said to her that they never had free access. Do you
28 understand me? I suggest that you are not being frank with the
29 Court today. Is that the case, that you are being less than

1 frank with us today?

2 A. What I am trying to explain to you maybe you didn't
3 understand it. You can have total control of the area, but the
4 kind of war we were fighting was not a conventional war that from
14:38:29 5 this position John Brown will say, "I am going to control this
6 position", and Peter Brown will say, "I am in control of the next
7 position." You can have control of this area, but the other
8 faction can use a bush path just to cause havoc, or
9 embarrassment, to get to another area and do what they want to do
14:38:50 10 there and then come back. That used to happen.

11 I told you publicly that this area that I drew the map for
12 was the total controlled area of ULIMO, but that never meant that
13 NPFL would not jump into the forest and this was part of Lofa and
14 there was a deep forest on the way to Bopolu and Marsala.

14:39:11 15 Sometimes you can walk in those forests and you will not see a
16 village with your naked eye. Sometimes you walk one day, two
17 days in that forest and you cannot see a village with your eyes,
18 so you can do anything within there and then get out again. That
19 was all I was trying to explain about that area.

14:39:29 20 Q. Do you need any longer to explain?

21 A. No.

22 Q. Have you explained it now?

23 A. I have explained what I can explain about that area.

24 Q. Very well. Let us move on to another aspect of this then.

14:39:49 25 The area you have drawn on the map as the extent of ULIMO
26 control, for how long, tell us, did ULIMO exercise control, with
27 whatever caveats, of the area you have drawn on that map? For
28 how long? From 1992, when you invaded, until when?

29 A. ULIMO had a total control of that area in 1993 and in 1994

1 ULIMO had a rift within the rank and file of ULIMO, so ULIMO was
2 divided into two, so in Bomi County and are Grand Cape Mount
3 County was now controlled by ULIMO-J and then from Lofa Bridge
4 area to Vahun, Foya, Kolahun, Voinjama, Zorzor, were now
14:40:48 5 controlled by ULIMO-K.

6 Q. If I were to give you, for example, a different coloured
7 pen you could draw another line for me, couldn't you, setting out
8 the boundaries between ULIMO-K and ULIMO-J. Could you do that?

9 A. Yes.

14:41:06 10 Q. Let me see if I have a different coloured pen. I am
11 grateful, your Honour. If you could just draw in that boundary
12 for me, please.

13 A. These were controlled by ULIMO-J and ULIMO-K was
14 controlling Bopolu, Lofa.

14:41:53 15 Q. I think, just for future reference, what we ought to do
16 perhaps is to put a letter J, and here is a pen, in the bottom
17 half of that and a letter K in the top part, please. There is a
18 pen there on the table.

19 A. This is K. This is J. [Indicated]

14:42:18 20 Q. Thank you very much. But in any event, despite that split,
21 the combined forces of ULIMO-K and J had control of that pink
22 demarcated area for how long, until when?

23 A. It was in 1994 that ULIMO had the split.

24 Q. For how long thereafter did ULIMO-K and ULIMO-J control the
14:42:52 25 areas you have marked on the map, after 1994, after the split?

26 A. After 1994?

27 Q. In 1994 there is a split into J and K?

28 A. Yes.

29 Q. But J retains its own forces, K retains its own forces and

1 they retain control of their respective areas?

2 A. Yes.

3 Q. For how long after 1994 did they remain in control of their
4 respective areas?

14:43:25 5 A. They remained in control each of their own areas until 1996
6 when NPFL and ULIMO-K merged.

7 Q. So putting all of that together then we can say that that
8 area marked by the pink line between 1992 and 1996 was controlled
9 by ULIMO, whether as a unified force or a split force J and K,
10 would you agree?

11 A. Yes, yes.

12 Q. Now in relation to that period when you were able to occupy
13 that area, with the map still up on the screen would you agree
14 that the main diamond mining areas in Liberia are located at the
15 following points: Lofa Bridge?

16 A. Yes.

17 Q. Use your pen and indicate on the map where Lofa Bridge is
18 please?

19 A. I am not seeing it clear.

14:45:01 20 Q. Is it somewhere within that pink area?

21 A. Yes.

22 Q. Now the Lofa River, as we can see, is also within that
23 area, isn't it?

24 A. Yes, the Lofa River is in the same - it is crossing the
14:45:22 25 Lofa Bridge downwards.

26 Q. That is also a diamond mining area, isn't it, the Lofa
27 River area?

28 A. Yes.

29 Q. Also in the Mano River area bordering the Sierra Leonean

1 border again that is the diamond mining area, isn't it?

2 A. Yes.

3 Q. And Lofa County generally is a diamond mining area, isn't
4 it?

14:45:52 5 A. No.

6 Q. What about Bomi Hills, is that a diamond mining area?

7 A. Yes.

8 Q. That too falls within the pink shaded area, doesn't it?

9 A. Yes.

14:46:08 10 Q. Nimba County, where is that? That's just to the right near
11 the border with Cote d'Ivoire. That's outside the area, is that
12 right? Nimba County we can see?

13 A. Nimba County is the border along the Ivory Coast and Guinea
14 area.

14:46:31 15 Q. Having just gone through those locations, Lofa Bridge, Lofa
16 River, Mano River, Lofa County, Bomi Hills, they are the main
17 diamond mining areas in Liberia, aren't they?

18 PRESIDING JUDGE: Mr Griffiths, exclude Lofa County. The
19 witness denied that Lofa County was --

14:46:56 20 MR GRIFFITHS: My fault. Your Honour is exactly right.

21 Q. Lofa Bridge, the Lofa River the Mano River area are the
22 main diamond mining areas in Liberia, aren't they?

23 A. Yes.

24 Q. So consequently when we put all of that together between

14:47:12 25 1992 and 1996 ULIMO had control of the main diamond mining areas
26 in Liberia, am I right?

27 A. Yes.

28 Q. Were those areas being mined during that period?

29 A. No.

1 Q. Why not?

2 A. Because we were fighting war.

3 Q. So every single individual living within that pink area for
4 the four years you tell us about, forsook mining for fighting.

14:47:55 5 Are you saying that?

6 A. The civilians might have been mining on their own, but
7 those identical areas were main motor areas between ULIMO-J and
8 ULIMO-K.

9 Q. Did ULIMO use forced labour in those areas for mining?

14:48:21 10 A. I am not aware of that.

11 Q. You are a field commander witness, come on. You would be
12 in a position to know, so help us please. Were ULIMO using
13 forced labour for mining in that area?

14 A. No.

14:48:42 15 Q. Well, if that's the answer why didn't you tell me that the
16 first time I asked the question?

17 A. ULIMO did not force anybody to mine in that Lofa Bridge
18 area. I said it from start, that when ULIMO-J and ULIMO-K had
19 their rift the Lofa Bridge area was a battle ground between
14:49:07 20 ULIMO-J and ULIMO-K throughout up to 1996.

21 Q. Very well. Now, within Liberia and indeed Sierra Leone
22 many of the artisanal miners we have been told about are
23 Mandingos, aren't they? The people who go into the river looking
24 for diamonds, they're Mandingos, aren't they? What's so funny?

14:49:39 25 Well, why are you laughing then?

26 A. I am not laughing at you. Just go ahead with your
27 questioning.

28 Q. The majority of those engaged in mining in that part of
29 West Africa, Liberia and Sierra Leone were Mandingos?

1 A. Yes.

2 Q. And ULIMO was made up of a high proportion of Mandingos,
3 wasn't it?

4 A. Mandingo and Krahn were in majority.

14:50:12 5 Q. So that's why I am asking you, see, to what extent ULIMO
6 was involved in exploiting the resources of that part of Liberia
7 it had conquered between 1992 and 1996. Can you help us?

8 A. Not to my knowledge.

9 Q. You've told us that during that period, and I pause to
14:50:43 10 suggest this, that ULIMO was in fact in control of that area up
11 until the elections in 1997. Would you agree?

12 A. The ULIMO-J and K were in control of the area when they
13 were fighting over Lofa Bridge. Today you hear that ULIMO-J has
14 taken over Lofa Bridge and the other times you will hear that
14:51:10 15 ULIMO-K has already taken over the Lofa Bridge, so that continued
16 up to 1996.

17 Q. My question was very different so I will ask it again.
18 Whatever conflict occurred between ULIMO-J and K during that
19 period, do you agree that they remained in occupation of that
14:51:32 20 area of the map up until the elections in 1997?

21 A. ULIMO had control over the area, the J and the K.

22 Q. Until 1997, do you agree, the elections?

23 A. Yes.

24 Q. As we know, you were a battalion commander, weren't you?
14:52:06 25 You were, weren't you? You were a battalion commander within
26 ULIMO, weren't you?

27 A. Yes.

28 Q. And in fact at one stage during the course of that
29 occupation you were appointed field commander?

1 A. I was appointed as acting field commander.

2 Q. What are the responsibilities of a field commander?

3 A. I was field commander for just two months.

14:52:49 4 Q. I asked a different question. What are the
5 responsibilities of a field commander?

6 A. The responsibilities of the field commander was to
7 coordinate the various front lines, to see to their needs.

8 Q. Consequently such an individual would have an overview of
9 the deployment of forces, movements and the like, wouldn't he?

14:53:15 10 A. Please repeat that question.

11 Q. Such an individual, given his responsibilities, would have
12 an overview of the movement and deployment of troops and the
13 like, would you agree?

14 A. Yes.

14:53:34 15 Q. Equally such an individual would be remiss in his duties if
16 he had failed to make investigations about his enemy. Would you
17 agree?

18 A. Please repeat that.

19 Q. Such an individual would not be carrying out his duty if he
14:53:55 20 failed properly to investigate his enemy. Would you agree?

21 A. Yes.

22 Q. Consequently we know that during that five year period from
23 1992 and 1997 on the one side ULIMO had the RUF and the other the
24 NPFL. Now you would have known about, or been told about, the
14:54:27 25 leaders of the RUF, wouldn't you?

26 A. I knew about the leaders of the RUF from Foya border when
27 we had conflict with the RUF and NPFL at all times.

28 Q. I just want to be clear about it. That's why I have to
29 press you on this. Were you during that period between 1992 and

1 1997 aware of the main names, the main characters, within the
2 RUF?

3 A. When RUF had control of their areas I never heard
4 information about their characters. The only thing I know, when
14:55:22 5 we were in Kenema area, Potoru area, going down to Zimmi to cross
6 into Liberia, whenever we captured a particular area they will
7 tell us that these people have not been treating us nicely.
8 Sometimes they take their people's wives from them. Sometimes
9 you find people who were forcibly put into the militia to fight
14:55:52 10 war and then if they refused they will die. Those were the
11 informations we had.

12 Q. So if I understand your answer correctly, it means that
13 even though you were a battalion commander you did not take the
14 simple step of finding out who might be commanding battalions on
14:56:10 15 the opposition. You didn't do that, is that right?

16 A. You mean my commander?

17 Q. As battalion commander did not even bother to take that
18 basic step if what you just told me is right. And is that
19 correct? Is that what you are telling us, that you didn't bother
14:56:32 20 to find out who was in charge of the battalions you were facing?

21 A. I did not understand the question clearly.

22 Q. Let me try it differently. Here we have you, battalion
23 commander in Lofa County, how many men did you have under your
24 command?

14:57:08 25 A. 400 men.

26 Q. No doubt as commander, and with the welfare of your
27 soldiers in mind, you would want to find out I wonder who is in
28 charge of the battalion of RUF fighters just across the way, the
29 other side of the jungle. You would have thought that would be a

1 sensible thing to do, wouldn't you?

2 A. We had two battalions that crossed into Liberia. I did not
3 have control over the other battalion. That area of Lofa Bridge
4 you are talking about from the upper side of the area, that is
14:57:46 5 from Zimmi or Mano River Kongo to crossover to Lofa Bridge, we
6 had another battalion called the Alligator battalion that passed
7 through that end. If you ask me from Bo Waterside, to Teani, to
8 Shenge, to Klay I can explain something better to you, but after
9 we had opened Po River, the time I was acting field commander, we
14:58:08 10 engaged the war towards Monrovia. That was operation Octopus in
11 1993. And I was such a leader for just two months. I have said
12 that to you.

13 Q. I am not going to be put off from asking my questions by
14 your deliberate refusal to answer them. So I am going to ask it
14:58:31 15 again.

16 MS HOLLIS: Objection, your Honour. I object to the word
17 "deliberate refusal to answer."

18 PRESIDING JUDGE: Mr Griffiths, I think try and break down
19 your questions so they are not so long. The danger is that you
14:58:43 20 will be misunderstood.

21 MR GRIFFITHS: Very well.

22 Q. You commanded a battalion in Lofa County?

23 A. Yes.

24 Q. You were facing battalions of RUF fighters coming from
14:58:58 25 Sierra Leone?

26 A. I don't know whether they were battalions or - I don't
27 know. All I know, I was fighting against RUF and NPFL.

28 Q. Forget battalions. You knew that groups of RUF fighters
29 might attack you from Sierra Leone?

1 A. From all sides.

2 Q. Do you think in that position it would be wise to find out
3 who was in charge of them, the people who were going to attack
4 you?

14:59:35 5 A. I know RUF is attacking my position in Sierra Leone and
6 I also - RUF are attacking my position inside when I enter in
7 Liberia.

8 Q. I am still going to ask the question again. Did you know
9 who was in charge of the RUF forces who might attack you?

15:00:01 10 A. What I do know, that information we would get about RUF is
11 that Corporal Foday Sankoh's group, RUF and NPFL, we used to see
12 the writing on the various houses that we used to get and also
13 people that - civilians that got on our side, even some of the
14 former RUF fighters and NPFL, we capture some of them and they
15:00:27 15 gave us the informations.

16 Q. When was the first time you heard the name of a RUF leader
17 called Superman?

18 A. Who?

19 Q. Have you heard of the name Superman?

15:00:47 20 A. I heard the name Superman. I know Superman in person when
21 I took Sam Bockarie to Monrovia. He was alone with Sam Bockarie.

22 Q. When did you first learn the name Superman?

23 A. That was the time I got to know about Superman, when I took
24 Sam Bockarie to Monrovia and Superman went along with him.

15:01:16 25 Q. So consequently it follows from your answer that when you
26 were a battalion commander in Lofa County you had never heard the
27 name Superman?

28 A. No, no.

29 Q. When was the first time you heard the name Sam Bockarie?

1 A. When Foday Sankoh was arrested in Nigeria and we continued
2 receiving an attack from the Foya border in Sierra Leone. We
3 managed - we got some of the civilians and some of the RUF who
4 gave us the information that the new leader of RUF is Mosquito,
15:02:03 5 Sam Bockarie. That was the time I got to know about Sam
6 Bockarie.

7 Q. Was that at a time when you were a battalion commander for
8 ULIMO?

9 A. No, I am talking about the time when I was in the
15:02:22 10 government of the Republic of Liberia during President Taylor's
11 regime. That was when he sent me to go and get Sam Bockarie to
12 go and bring him over to him. That was the time I got to know
13 about that.

14 Q. So it follows then that the first time you heard the name
15:02:41 15 Sam Bockarie was in 1998 when you claim to have been sent to
16 Sierra Leone to fetch him?

17 A. Let me make this thing clear.

18 Q. Please.

19 A. No, no. I got to know Sam Bockarie when I was attacking -
15:03:06 20 when Sam Bockarie RUF members were attacking Foya when I was
21 general supervisor at that time, not battalion commander again.

22 Q. Was that before you went to fetch him?

23 A. Before I got to know about Sam Bockarie, in Foya that
24 happened 93 ending to 94. And I went to get Sam Bockarie, that
15:03:36 25 happened in 1997.

26 Q. We finally got there. It follows that you knew of the name
27 Sam Bockarie from the time you were a battalion commander in
28 ULIMO, doesn't it, 1993 and 1994?

29 A. No.

1 Q. So what were you doing - remember we have just gone through
2 the history. You have told us you were in ULIMO from 90 to 97.
3 If you learned of it in 1993, 1994 does it not follow that that
4 occurred at a time when you were within ULIMO?

15:04:14 5 A. I said clear 93, 94 I was not a battalion commander any
6 more. I was the general supervisor to coordinate the front
7 lines. When I visited Foya and there were attacks there, they
8 said headed by the new commander of RUF, Sam Bockarie Mosquito.
9 Got it?

15:04:44 10 Q. So by the time you say you were sent to fetch him from
11 Sierra Leone you already knew about him?

12 A. I only used to hear his name. I did not know him in
13 person. I had never seen him before. Only when the former
14 leader sent me - said try - "Go to Sierra Leone and get Sam

15:05:16 15 Bockarie to come over to me."

16 Q. Very well. At 20 minutes past 11 this morning in answer to
17 a question from my learned friend who prosecutes, in relation to
18 the question civilians don't have blood you told us that all the
19 warring factions adopted that attitude. When you said all the
15:05:57 20 warring factions who were you referring to?

21 A. Please repeat that question. The warring factions were
22 doing what?

23 Q. You were asked this morning about the phrase, "Civilians
24 don't have blood." Do you remember that?

15:06:18 25 A. Yes.

26 Q. And in answer to that question this morning at 11.20 you
27 told us that all the warring factions adopted that attitude. Is
28 that right?

29 A. Yes.

1 Q. And did that include ULIMO?

2 A. Yes.

3 Q. And, you see, that's what I want to ask you about, because
4 ULIMO used child soldiers, didn't they?

15:06:56 5 A. All warring factions used child soldiers.

6 Q. So the answer to my question is yes?

7 A. Yes.

8 Q. ULIMO on occasion mistreated civilians, didn't they?

9 A. I said all warring factions were involved in treating
15:07:26 10 civilians bad, because in every unit you must have people there
11 who are ugly, who are doing the ugly things. So I will not limit
12 that one only to NPFL. That includes the RUF, the ULIMO, the
13 NPFL, the ULIMO-J, the APC. All the factions were involved in
14 ugly things.

15:07:53 15 Q. Let me ask you again about something else which has been
16 stressed and underlined by the Prosecution. ULIMO also took
17 women as sex slaves, didn't they?

18 A. Please repeat that because I didn't understand.

19 Q. ULIMO also took women as sex slaves, didn't they?

15:08:20 20 A. I did not say so.

21 Q. Yes or no?

22 A. No.

23 Q. So just tell us, please, what were the ugly things that
24 ULIMO did do but avoided the horror of taking sex slaves. Tell
15:08:43 25 us about the ugly things they'd do.

26 A. I said all warring factions were involved, civilians don't
27 have blood. They also train underage people, both male and
28 female. All warring factions were involved in that.

29 Q. I am asking you about another aspect of that horror, you

1 see, and I am asking you specifically were ULIMO combatants
2 involved in taking females as sex slaves?

3 A. Yes.

15:09:38

4 Q. Did also ULIMO have a particular practice of burying people
5 alive?

6 A. I think to [indiscernible], for every ugly thing I told you
7 about, all warring factions were involved in it.

8 Q. Is the answer to my question yes?

9 A. Yes, yes, yes.

15:09:59

10 Q. And help us with this, please, could you describe for our
11 assistance the uniform of a senior ULIMO officer?

12 A. The uniform that ULIMO were using? ULIMO was not using
13 uniforms. The uniform that they had was LUDF of that time and
14 that was only limited for six months. ULIMO was not using

15:10:36

15 uniforms.

16 Q. Are you suggesting that not even senior ULIMO officers were
17 wearing uniforms?

18 A. If you say among thousands of men, one, two, three person
19 using uniform and that you will call an ULIMO using uniform then
20 I will say yes because a senior commander will go and look for it
21 on their own to get their uniforms. Where he get it from I don't
22 know. But majority, 99 per cent, nobody was using uniform.

15:10:58

23 Q. In any event, and I am still dealing with the time line
24 now, 1994, 1995 you agree ULIMO split, yes? A nod doesn't
25 register on the tape. You just nodded and I am sure you were
26 nodding in agreement, but you need to say yes out loud. So you
27 agree the split was 1994, 1995?

15:11:38

28 A. Yes.

29 Q. Now in 1995 during the course of the transitional

1 government you were given an appointment in the Executive
2 Mansion, weren't you?

3 A. Yes.

4 Q. Then we know that in 1996 there was the Abuja Peace Accord?

15:12:24 5 A. Yes.

6 Q. Then in August 1997 there were elections in Liberia.

7 A. Yes.

8 Q. As a consequence of that election Charles Taylor was
9 democratically elected president in an election monitored by
10 international observers and declared to be free and fair. Do you
11 agree?

12 A. Yes.

13 Q. Having so been elected he invited you to work for the
14 government, didn't he?

15:13:15 15 A. Yes.

16 Q. Now given your history of fighting against him and given
17 your admission this morning that you hated him, did it surprise
18 you that he had offered that invitation to you?

19 A. It did not surprise me.

15:13:37 20 Q. Why not?

21 A. In 1996 when ULIMO came and NPFL merged I was one of the
22 most strongest commanders that Mr Taylor could like at that time.
23 From that time up to the election he got to know about me. Based
24 upon that I had influence over ULIMO territories. To me, to my
25 knowledge, that was the reason why he had me appointed and to
26 maintain the position so he can use me to do what he wanted me to
27 do for him.

15:14:14

28 Q. And the bottom line is he was seeking, by recruiting
29 members of the opposition like yourself, to reconcile differences

1 in Liberia, wasn't he?

2 A. He started that.

3 Q. He was seeking reconciliation, would you agree?

4 A. Yes.

15:14:46 5 Q. I want to pause, you see, to investigate that a little
6 further. Given the experiences you had gone through fleeing from
7 Kakata to Monrovia and ending up in that refugee camp, what was
8 going through your mind at the prospect of working for this man
9 you hated?

15:15:17 10 A. I felt bad, but that does not mean I hated him.

11 PRESIDING JUDGE: Mr Interpreter did you say bad?

12 THE WITNESS: I felt bad for moving me from my home from
13 one place to another place, but yet still I felt happy, but that
14 does not mean I hated Mr Taylor at that time, no.

15:15:48 15 MR GRIFFITHS:

16 Q. So you were able, is this right, to put all of that behind
17 you?

18 A. Yes.

19 Q. Now in dealing with this period following your appointment
15:16:28 20 as assistant director of operations - you may assist us by
21 turning please to page 95 in that bundle. The number at the top
22 of the page is 00027833. Do you have that page?

23 A. Yes.

24 Q. Now this was notes of an interview conducted with you on 10
15:17:18 25 and 13 November 2006 in Monrovia, Liberia when the gentleman who
26 sits on the front row of the prosecution bench Mr Werner and one
27 Janet Tommy spoke to you, is that right?

28 A. Yes. I don't know his name, I can't remember his name at
29 that time, but I was interviewed at that time from somebody from

1 the Special Court.

2 Q. Now I want to go through in a little detail the contents of
3 the first two pages of this interview, dealing as it does with
4 your initial period working with Mr Taylor. Do you follow me?

15:18:01 5 A. Yes.

6 Q. Do you see under the heading "Further clarification" - do
7 you see that sub-heading there on the page?

8 A. Where?

9 Q. "Further clarification" in the middle of the screen, yes?

15:18:24 10 A. This picture is - okay.

11 Q. Now having set out in the first paragraph that the
12 beginning of the military operations of ULIMO in Liberia started
13 at the end of 1992, the split of ULIMO into two factions ULIMO-K
14 and ULIMO-J took place in 1995, the witness was battalion

15:18:50 15 commander for ULIMO. Then you go on to describe about the peace
16 accord in 1995 and you then say this:

17 "Within one week after Charles Taylor's election as
18 President of Liberia in August 1997 Taylor sent Joseph Montgomery
19 to invite the witness for a meeting at his residence near the
20 German embassy." Is that right?

15:19:13

21 A. Yes.

22 Q. It goes on:

23 "Taylor told the witness that he wanted to reappoint him in
24 the same position in his government in order to bring peace and
25 encourage ULIMO members to collaborate with his government."

15:19:30

26 Again, is that right?

27 A. Yes.

28 Q. And then it goes on:

29 "Taylor wanted the witness to take part in his government

1 because the witness was one of the most senior commanders of
2 ULIMO and had not taken part in the infighting in ULIMO.
3 Furthermore the witness had been one of the founding members of
4 the ULIMO and was respected across the board in the ULIMO
15:20:06 5 movement." Is that true?

6 A. Yes.

7 Q. "After the reappointment of the witness by Taylor the
8 witness was consulted by Taylor on the best way for him to gain
9 the trust of the commanders of former ULIMO-K in the Lofa County.
15:20:24 10 These former commanders of ULIMO-K were still in control of the
11 entire Lofa County."

12 PRESIDING JUDGE: Sorry, Court Manager, could you make sure
13 the public can see what is being read. Keep turning the pages,
14 please.

15:20:42 15 MR GRIFFITHS: I am looking at page 27834, Court Manager,
16 so you need to slide it - no, no. Turn it back over and slide it
17 to the right so we are seeing - that's the one. I am looking at
18 three lines from the top of that page.

19 Q. "After the reappointment of the witness by Taylor the
15:21:06 20 witness was consulted by Taylor on the best way for him to gain
21 the trust of the commanders of former ULIMO-K in the Lofa County.
22 These former commanders of ULIMO-K were still in control of the
23 entire Lofa County. The commanders for former ULIMO-J were in
24 control of Bomi County." Was that the truth?

15:21:33 25 A. Yes.

26 Q. Does it follow then that ULIMO-K were still in control of
27 Lofa County after the election?

28 A. The leadership was dissolved, but the fighters were still
29 at their position.

1 Q. And it goes on:

2 "The witness advised Taylor that the best way to accomplish
3 that goal was to employ most senior commanders for former ULIMO-K
4 in his government. The witness advised Taylor as well that the
15:22:14 5 commanders employed should come from the following control areas
6 in Lofa: Zorzor, Voinjama, Kolahun, Foya and Vahun. Taylor
7 agreed and employed 20 former ULIMO-K commanders in his
8 government." Is that right?

9 A. Yes.

15:22:41 10 Q. Skip the names, I'm not interested in them. "These 20 men
11 were first employed in the SSS unit." That was the unit you were
12 in, wasn't it, witness?

13 A. 15 were employed in the SSS, five were sent to immigration.

14 Q. And then it goes on to deal with the fact that you were
15:23:14 15 replaced in your old position as assistant director of
16 operations. We see that, don't we, and we know that to be true?

17 A. Yes.

18 Q. Let's just leave the election now, shall we, and its
19 immediate aftermath and come back to our time line. I want to
15:23:51 20 move now to 13 February 1998. Do you recall now that on that
21 date the AFRC were kicked out of Freetown?

22 A. Please repeat the question.

23 Q. Do you recall that on 13 February 1998 the AFRC were kicked
24 out of Freetown?

15:24:26 25 A. It was 1998, the beginning of the year. I do not know the
26 particular date.

27 Q. Very well. Do you recall that they were kicked out of
28 Freetown with the assistance of the Liberian government?

29 A. I do not know that.

1 Q. I ask, you see, because during the course of your evidence
2 you have appeared to suggest to this Court that you were a
3 confidant of Mr Taylor, so that's why I am asking. Are you aware
4 that the Liberian government assisted in the removal of the AFRC
15:25:10 5 by allowing bombing raids from Liberian territory, from
6 Robertsfield in particular. Did you know that?

7 A. If you say ECOMOG I will say yes.

8 Q. So you're saying that Mr Taylor as President of Liberia did
9 not agree to the use of Roberts International Airfield for
15:25:37 10 bombing raids to drive the AFRC out of Freetown? Is that what
11 you're saying?

12 A. Monrovia Robertsfield International Airport was used. That
13 is why I said if you say ECOMOG I will say yes.

14 Q. But you agree that the bombing raids were launched from
15:25:58 15 Roberts International Airfield?

16 A. Yes.

17 Q. Are you sure about that?

18 A. Yes.

19 Q. And those bombing raids were to drive the AFRC out of
15:26:10 20 Freetown?

21 A. Yes.

22 Q. When you say that if I said ECOMOG you would agree, why is
23 that?

24 A. I said ECOMOG first. ECOMOG first asked the AFRC to move
15:26:39 25 and they refused. Then ECOMOG used the air raids to remove them.
26 But if you say we offer them the Roberts International Airport by
27 the government then I will say yes. The Roberts International
28 Airport was used.

29 Q. Thank you. At that time were ECOMOG in control of Roberts

1 International Airfield?

2 A. Yes.

3 Q. And so they were in a position to control who flew in and
4 out of that airfield?

15:27:23 5 A. I do not have much idea about ECOMOG's movement.

6 Q. I need to press you on that. Did ECOMOG, as controllers of
7 that airfield, were they in a position to stop flights from
8 landing and flights from leaving?

9 A. You mean Robertsfield?

15:27:54 10 Q. Yes, please.

11 A. ECOMOG was there, but the government was also functioning.
12 I do not know about ECOMOG's movement at the Roberts
13 International Airport, but they were there.

14 Q. Now we know, because I just want to develop this point a
15:28:13 15 little further, that ECOMOG arrived in Liberia in 1990 and they
16 departed in the year 2000. Now what I would like you to assist
17 us with is this: During that 10 year period did they have
18 control of Roberts International Airfield and James Spring
19 Airfield in Monrovia?

15:28:40 20 A. ECOMOG was on their own. They were split between the
21 ECOMOG and the Liberian government. They were not moving on the
22 same line because we used to monitor the local radios when
23 Mr Taylor said, "I want ECOMOG to leave now. I have a government
24 on my own." ECOMOG said, "No, we are here to bring peace and you
15:29:09 25 have an election. We have the money to train the Liberian
26 national army and the police" and Mr Taylor will say no. So this
27 holding and pulling, ECOMOG began moving their forces to Freetown
28 little by little. But this had nothing to do with the
29 government. The government was doing their own and ECOMOG was on

1 their own now. There was confrontation between ECOMOG and the
2 Liberian government.

3 Q. Let me ask a specific question: Throughout that period
4 from 1990 to 2000 did ECOMOG deploy troops at Roberts

15:29:51 5 International Airfield and James Spring Airfield in Monrovia?

6 A. ECOMOG was there. They had their sub-bases, that's the
7 sub-unit, but they were not functioning as they were in Liberia
8 before the election. The government had their own control, what
9 were happening.

15:30:17 10 Q. The question I am asking, and let me spell it out to you,
11 if ECOMOG had control of those two airfields they would be in a
12 position to monitor the shipment of arms into the country through
13 those airfields. That is why I am asking you, see. So the
14 question quite simply is this: Throughout that 10 year period

15:30:42 15 did ECOMOG have military forces based at those two locations?

16 A. ECOMOG had base at that two locations but ECOMOG was not in
17 charge of security in Liberia any more.

18 Q. That may well be the case, but I am asking a simple
19 question. Were they in those two locations throughout that
15:31:09 20 decade?

21 A. ECOMOG was in Robertsfield, ECOMOG was in James Spring
22 field.

23 Q. Thank you very much.

24 PRESIDING JUDGE: Mr Interpreter, why don't you finish your
15:31:26 25 sentences? What is going on?

26 THE INTERPRETER: [Microphone not activated].

27 PRESIDING JUDGE: Why don't you finish your sentences when
28 you are interpreting.

29 THE INTERPRETER: The witness is too fast.

1 THE WITNESS: Are you referring to me?

2 PRESIDING JUDGE: I am talking to the interpreter. Because
3 we need your interpretation for the record. For example that
4 last sentence was not finished. Mr Griffiths, I think we had
15:32:06 5 better move forward.

6 MR GRIFFITHS: I think we will, your Honour, yes.

7 Q. I just want to take a slight detour please, witness, and
8 ask you about your role as [microphone not activated]?

9 PRESIDING JUDGE: Please put on your microphone and ask
15:32:21 10 again.

11 MR GRIFFITHS: Let me ask again.

12 Q. I just want to take a slight detour and ask you about your
13 responsibilities as an assistant director in the SSS. One of
14 your responsibilities was to organise the presidential motorcade,
15:32:38 15 wasn't it?

16 A. The assistant director was responsible for the safety of
17 the president, the immediate family and the movement of the
18 president's motorcade.

19 Q. There was also a unit wasn't there called the closed
15:33:01 20 protection service, CPS?

21 A. CPS was my immediate deputy. He had instructions from me.

22 Q. Was that Osibio Dembi?

23 A. Yes.

24 Q. And, as the name suggests, they would be the ones who would
15:33:32 25 provide the immediate bodyguard services to the President?

26 A. Including the assistant director for operation, any deputy
27 director for operation and the proper director. Those are the
28 people who were in charge of the operation. The CPS was not
29 operating on its own. When the instruction comes from the

1 director it goes to the deputy director for operation and then it
2 goes downwards to assistant director for operation and then the
3 assistant director for operation will instruct the CPS on what to
4 do.

15:34:10 5 Q. But in physical terms the CPS officers would be the ones
6 immediately next to the President?

7 A. No, you had the aide-de-camp who were close to the
8 President, you had the director. The three directors I am
9 talking about, they were always in the movement of the President.

15:34:38 10 That is the SS director and the deputy for operation and the
11 assistant for operation, including the CPS.

12 Q. I suggest that is quite wrong. I suggest that the CPS had
13 total control of that situation. You see, the reason why I am
14 pursuing this line of cross-examination with you is because in
15:35:01 15 due course I am going to suggest to you that you were never as
16 close to President Taylor as you claim to be. Do you follow? Do
17 you follow me?

18 A. That is not true.

19 Q. I suggest that you are quite falsely suggesting that you
15:35:21 20 were part of the inner circle, an insider, when in fact you were
21 not. Are you with me?

22 A. That means you are telling me that the director of SSS and
23 the deputy director were not also close.

24 Q. I am suggesting that the CPS, the close protection service,
15:35:45 25 had direct responsibility for the safety and welfare of the
26 President and his family and your role was to look after the
27 motorcade, make sure there was petrol in the tank and tyres on
28 the wheels and your role didn't go much beyond that?

29 A. Who was the CPS reporting to?

1 Q. I am suggesting that the man Osibio Dembi was the person in
2 charge of that. You had nothing to do --

3 A. To whom did he report?

4 Q. I am not here to answer the questions.

15:36:23 5 PRESIDING JUDGE: Mr Witness, it would help if you would
6 answer the questions rather than ask them.

7 THE WITNESS: The answer is I was the boss for the CPS. He
8 never did anything on his own. He had instructions from me.
9 When he says CPS it means chief of protective service. He also
10 had a unit under him. He had an advance under him. He had a
11 motorcade under him. Equally so for me, whatever thing I did
12 I will pass it through my senior boss the deputy director for
13 operation and then it will go upwards to the SSS director. That
14 was how the hierarchy was. That was how the [indiscernible] was.
15:37:08 15 Up to the moment I am talking. The act that created the SSS will
16 show that.

17 Q. I have made my suggestion so I am going to move on. We do
18 know, don't we, that it was following the bombing raid on
19 Freetown that a helicopter arrived at Springfield containing
15:37:39 20 some AFRC members. Do you recall that incident?

21 A. Yes.

22 Q. And the helicopter was in effect impounded by ECOMOG
23 troops. That's right, isn't it? They seized the helicopter and
24 its occupants?

15:38:03 25 A. Yes.

26 Q. Now the occupants of that helicopter which included the
27 commander of the Sierra Leonean air force were eventually
28 returned to Sierra Leone, weren't they?

29 A. ECOMOG took them back to Sierra Leone.

1 Q. I am suggesting that they were taken back to Sierra Leone
2 with the full approval and support of President Taylor. Would
3 you agree?

4 A. No.

15:38:35 5 Q. Why not?

6 A. I was instructed by Mr Taylor to receive the people at the
7 James Spring field, but when we went there ECOMOG had intercepted
8 the whole helicopter. They did not even give us opportunity to
9 go closer to the helicopter. The ECOMOG took total control of
10 the people and sent them back to Freetown.

15:38:59

11 Q. And of course ECOMOG were in a position to do that because
12 of their superior military might. Would you agree?

13 A. Yes.

14 Q. Because effectively at this stage ECOMOG was controlling
15 Liberia, wasn't it, militarily?

15:39:17

16 A. Not all over Liberia. It was around the city.

17 Q. So let's just take it in stages and look at various aspects
18 of that control, shall we, because it has relevance later. We
19 know from the incident with the AFRC helicopter that they
20 controlled James Spring Airfield. Would you agree?

15:39:41

21 A. ECOMOG had their sub-base at James Spring field, but I told
22 you ECOMOG was no longer in charge of any security in Liberia.

23 Q. But you have already agreed with me that they had a force
24 at Roberts International Airfield. That's right, isn't it?

15:40:11

25 A. Please repeat. Please repeat. Because I am getting Krio
26 in my ear.

27 PRESIDING JUDGE: What did you say, Mr Witness?

28 MR GRIFFITHS: Somebody is speaking Krio to him through --

29 PRESIDING JUDGE: Mr Interpreters, will you please sort

1 yourselves out so that you do not confuse what is coming through
2 in the microphones and the earphones.

3 THE INTERPRETER: There might have been an overlap, your
4 Honours.

15:40:45 5 PRESIDING JUDGE: Please ask the question again,
6 Mr Griffiths.

7 MR GRIFFITHS:

8 Q. ECOMOG, as the incident with the helicopter carrying the
9 AFRC people reflects, they controlled James Spring Airfield,
10 didn't they?
15:41:05

11 A. ECOMOG move in with their convoy and took complete control
12 of the helicopter. That was what happened. It was not that
13 ECOMOG was in charge of the security of the James Spring field.
14 They moved in with the convoy and took total control of the
15 helicopter. That was what happened.
15:41:32

16 Q. But also ECOMOG had established road blocks all over the
17 country, hadn't they?

18 A. Not all over the country. ECOMOG was staying still in the
19 capital city Monrovia, only Monrovia, Robertsfield and James
20 Spring field. They were not in control of the side of the
21 countries any longer.
15:41:58

22 Q. What about road blocks along that green route going up to
23 Kolahun? Had they established road blocks on that?

24 A. Who put road blocks on the road?

15:42:20 25 Q. I am asking if ECOMOG had established road blocks on that
26 road going up to Kolahun to Monrovia?

27 A. ECOMOG was from 15 Gate, to Mabarklay, to Careysburg and
28 Robertsfield and James Spring field. ECOMOG was not within the
29 rest of the country any longer. This 15 Gate was very close to

1 the city.

2 Q. You see, the reason I am asking you about this is yesterday
3 during the course of your evidence when you were speaking about
4 the trip to collect Sam Bockarie you were asked this question:

15:43:21 5 "Q. Now when you went to Sam Bockarie you said that you
6 did not know him personally. Were you given any type of
7 letter of introduction, or other document to take with you?

8 A. No, I was not given a document."

9 Q. Do you know why you were not given such a document?"

15:43:45 10 I want you to listen to this part carefully, please.

11 "A. If document had been given to me, if ECOMOG intercept
12 that is going to be a problem so because of" - and there
13 was an indiscernible word - "and knowing personally to
14 myself, but he did not explain to me why he did not give me
15:44:10 15 document and I also did not request for document."

16 Now that's a passage from the transcript of
17 yesterday's proceedings. Do you remember telling us that?

18 A. Yes, I said that. ECOMOG was around red light area. They
19 were at Mabarklay they were at Careysburg, they were at 15 Gate.
15:44:30 20 Those were the areas I was referring to. But the moment you move
21 an inch from that area, the rest of the parts of the country
22 there was no longer ECOMOG presence there.

23 Q. But in any event the fact of the matter is from that answer
24 you gave yesterday one needed to take precautions because of
15:44:51 25 ECOMOG's presence. Would you agree?

26 A. No. I had the confidence that I could get the man, so that
27 made me capable and the most trustful person that he appointed as
28 the assistant director for operation. He knew that I was a
29 mature man, I was capable, I was strong enough in Lofa County.

1 I could liaise with the RUF commander to get him. He had that
2 confidence in me. That was why he said I should go.

3 Q. I am not asking you about that. All I am simply asking you
4 about is the effectiveness of ECOMOG control during that 10 year
15:45:35 5 period. So let me ask you again: Did you not take documentation
6 with you for fear of being caught in possession of them by
7 ECOMOG?

8 A. I did not take a document. If I took documents to go and
9 get Sam Bockarie it will be known to the Liberian people that Sam
15:46:04 10 Bockarie is coming to Monrovia, if we were intercepted anywhere
11 in Monrovia. So if that document was found on me it was going to
12 be a problem to me. So knowing myself, I knew that I was not
13 going with the document, but I knew I could do the job. That was
14 in fact the reason why I did not ask for a document and I did not
15:46:25 15 go with any document. So many assignments were given to me, but
16 no document was given to me at that point in time. But it never
17 happened that somebody sent me on an assignment but he put a
18 document behind that. It never happened.

19 Q. Do you agree that you did not carry documentation with you
15:46:43 20 because of ECOMOG?

21 A. Yes.

22 Q. Now what kind of equipment did ECOMOG have?

23 A. I don't know. I am not a member of ECOMOG to know what
24 type of equipment they were dealing with.

15:47:10 25 Q. So you never came in contact with them during that 10 year
26 period?

27 A. No, I had no dealings with any ECOMOG person.

28 Q. And you didn't see any of them?

29 A. I saw them. I saw them.

1 Q. Given that you have seen them, what equipment did they
2 have, remembering of course that you are a military man?

3 A. ECOMOG had jet bombers. ECOMOG had arms. ECOMOG had
4 vehicles. ECOMOG wore uniforms, military uniforms.

15:47:54 5 Q. Types of equipment which the Liberian military did not
6 have, would you agree?

7 A. Yes, they had some weapons that the Liberian government
8 never had.

9 Q. And they also had tanks, didn't they?

15:48:16 10 A. They also had war tanks.

11 Q. Thank you. Now if I understand the sequence of events
12 correctly as described by you yesterday, it was after the seizure
13 of that helicopter at Springfield that you were asked by
14 President Taylor to go and get Sam Bockarie. Is that right?

15:48:46 15 A. Yes.

16 Q. So we can take it then that your trip to Sierra Leone took
17 place some time after 13 February 1998?

18 A. When the helicopter was seized from Freetown, two days
19 after that, just two days after, when he made an announcement
15:49:18 20 that actually ECOMOG should not leave - should now leave, he is a
21 government of his own. It was on the third day that he called me
22 to his office and gave me the instruction to go and get Sam
23 Bockarie.

24 Q. So it was within a matter of days of that helicopter
15:49:38 25 incident, yes? It was within a matter of days of the helicopter
26 incident that you embarked on your mission?

27 A. What I know, it was the beginning of the year 19 - I can't
28 recall the actual dates.

29 Q. There was another event, important event, in 1998, wasn't

1 there, that's when LURD invaded Liberia. When in 1998 was that?

2 PRESIDING JUDGE: Mr Witness, don't nod your head, please.

3 We would like you, for the record, to say something.

4 MR GRIFFITHS: I will ask the question again, your Honour.

15:50:31 5 Q. LURD invaded the country in 1998, didn't they?

6 A. The end of 1998 going into 1999.

7 Q. Now, who armed and supported LURD?

8 A. I have no idea. I was not a member of LURD. The

9 intelligence information that I got was that they used Guinea to

15:51:03 10 enter Lofa County through Foya. Those were the information that

11 I got. I did not know where they got their support or whom they
12 got it from.

13 Q. But they invaded from Guinea, is that right?

14 A. Yes, yes.

15:51:20 15 Q. Guinea which had financed ULIMO?

16 A. Yes.

17 Q. Who led them, LURD?

18 A. I heard the leader on the radio and that he was Jamani

19 Kamara and later we heard another name Sekou Damate Conneh.

15:51:52 20 I used to get my information through the radio.

21 Q. Now when LURD invaded they were very well equipped, weren't
22 they?

23 A. I have no idea whether they were equipped or not.

24 Q. They made major incursions into Liberia, didn't they?

15:52:23 25 A. Of course, yes.

26 Q. Help me with this: In that situation do you agree that the
27 Government of Liberia had every right to defend itself?

28 A. Yes.

29 Q. And during that time arms were in short supply in Liberia,

1 weren't they?

2 A. You mean the government forces? Yes, yes.

3 Q. [Overlapping speakers]

4 THE INTERPRETER: Your Honours, please, it appears counsel
15:53:03 5 is not waiting for the English interpretation, thus some of the
6 overlappings that are taking place.

7 MR GRIFFITHS: Please blame me. Let me ask the question
8 again.

9 Q. Compared to LURD the government forces in Liberia including
15:53:22 10 the militia were very badly equipped, weren't they?

11 A. They were not well equipped.

12 Q. One of the reasons why government forces were so ill
13 equipped was, firstly, many arms seized from former combatants
14 had been burned, hadn't they?

15:54:13 15 A. The reason they were not equipped from the beginning was
16 because the entire country was disarmed and they were burned by
17 ECOMOG, that I know of.

18 Q. Did you say burnt or bombed?

19 A. Burnt. The ECOMOG took the entire arms from all the
15:54:46 20 militia, all the fighters and burnt them down completely. There
21 were no arms and ammunition enough in the country.

22 Q. Of course the United Nations in their wisdom had imposed
23 arms control on Liberia in 1993, five years previous. That's
24 right, isn't it?

15:55:12 25 A. Yes.

26 Q. If we can put all of that together we have a country ill
27 equipped to defend itself against an armed invasion from another
28 country funded by another country. Would you agree?

29 A. Yes.

1 Q. Now in 1999 to 2000, and I am going back to the chronology
2 of events now, you were moved from your post in the SSS, weren't
3 you?

4 A. I am listening to you, I didn't get the question clearly.

15:56:15 5 Q. In 1999/2000 you were moved from your post in the SSS,
6 weren't you?

7 A. Yes.

8 Q. And then just three more dates to conclude the chronology.

9 On 6 January 1999, so shortly after the LURD invasion, we had the
15:56:42 10 Freetown invasion, didn't we? Do you remember that?

11 A. I cannot recall that date, that date, but what I know,
12 I was removed from my position and sent to central for six
13 months.

14 Q. Because in 2000, which is the second of the three remaining
15:57:08 15 dates, you were moved to immigration, weren't you?

16 A. In 2000 I was transferred to immigration and also appointed
17 as the deputy chief of staff of army division.

18 Q. Was there a particular reason why you had been moved from
19 your post as assistant director?

15:57:35 20 A. No reason was given to me, but the reason I knew myself was
21 that maybe the intelligence information that was coming out that
22 people were coming in to attack from Guinea, all the intelligence
23 was that they were suspicious of me and maybe that was the reason
24 why he decided to remove me, but nobody gave me any reason at all
15:58:03 25 why I was removed.

26 Q. And help us, why might they have been suspicious of you at
27 that point?

28 A. The reason, the people that were coming in with LURD
29 especially 75 per cent were both Krahn and Mandingo and these

1 same people were the same people who comprised ULIMO and knowing
2 me to be one of the most senior commanders, especially knowing
3 that people whom I recommended to Mr Taylor and he included them
4 in his government, they escaped, they went and joined the LURD,
15:58:48 5 for that reason he looked at me with some suspicious eyes.

6 Q. Was that the sole reason why you were moved as far as you
7 could see?

8 A. To the best of my knowledge that was the reason to me, but
9 in particular to the former leader, he didn't give me any reason.

15:59:15 10 Q. However in 2003, as you have explained, you are appointed
11 deputy chief of staff and your area of responsibility was the
12 Bomi Hills near the Mano River, wasn't it?

13 A. No, I said Bomi County, Bopolu. Bomi and Bopolu and part
14 of Margibi.

15:59:49 15 Q. Now having traversed that historical period can we wind up
16 by dealing with one or two concluding propositions: Firstly --

17 A. Oh, my first position in the immigration?

18 Q. I have not asked the question yet and I was waiting on the
19 interpreter --

16:00:15 20 PRESIDING JUDGE: Mr Interpreters, I don't know what you
21 are doing back there, but please pay attention to the questions
22 being asked by the lawyer and be accurate in your interpretation.

23 MR GRIFFITHS:

24 Q. I just want to put one or two concluding propositions to
16:00:29 25 you on this chapter, okay? Firstly, would you agree that upon
26 his election as President, Charles Taylor was anxious to restore
27 peace to Liberia?

28 A. Actually I can agree with that, yes.

29 Q. Secondly, that it is precisely because he was committed to

1 peace that people like yourself, formerly hostile to him, were
2 willing to be brought into his government?

3 A. Yes.

16:01:26

4 Q. Because, thirdly, you would agree that he was anxious to
5 create unified Liberia and appease the various warring factions?

6 A. Yes.

16:02:03

7 Q. I now want, with your help, to look at one aspect of that
8 and that chapter I have headed "Disarming ULIMO and Other Warring
9 Factions." Do you follow me? That's the chapter I want to deal
10 with, okay? Now it was clear, wasn't it, following the elections
11 in August 1997 that some of the warring factions, including
12 ULIMO, had not totally disarmed?

13 A. Yes, including NPFL also.

14 Q. And an atmosphere of mistrust pervaded the country?

16:02:39

15 A. Yes.

16 Q. President Taylor's government then adopted, did it not, a
17 policy to use former senior members of each faction, such as
18 yourself and Ruth Milton. Would you agree?

16:03:12

19 A. Others were invited, especially the ULIMO-J, but they
20 refused. Actually he had a plan to do that, but the others
21 refused.

22 Q. And the idea of recruiting people like yourself into the
23 government was in order to persuade your supporters to give up
24 their arms. Would you agree?

16:03:32

25 A. Yes.

26 Q. You can assist us with this aspect of it if you were to
27 turn with me, please, to page 104 in that bundle. The number at
28 the top of the page for the record is 00025745. Do you have that
29 page?

1 A. Yes, I have got it.

2 Q. If we pick it up on the top line about two-thirds of the
3 way through:

4 "The witness got concerned about the possibility that in
16:04:39 5 spite of the disarmament process being officially over in Liberia
6 arms and ammunition from ULIMO could be discovered in Lofa County
7 and that he might be blamed for it by Taylor as he was a former
8 high level ULIMO commander and was well known to still have a lot
9 of influence in that county. Therefore he approached
16:05:01 10 Charles Taylor with the proposal to do a mission to Lofa County
11 and look around to check if there still were any weapons hidden
12 there. Charles Taylor agreed with this proposal, assigned the
13 witness on that mission and gave him a new Land Rover for the
14 trip to Lofa County."

16:05:23 15 Do you agree with that?

16 A. Yes.

17 Q. Now I agree, I have a slight dispute over this, but I don't
18 want us to fall out over this little dispute. Was it not the
19 case that it was Mr Taylor's idea in the first place to send you
16:05:39 20 off to Lofa County to see if you could discover arms which might
21 have been retained? Wasn't it his idea, not yours?

22 A. It was a good idea.

23 Q. Whose idea was it, yours or President Taylor's?

24 A. The idea came from myself. It was I who proposed it to
16:06:08 25 him, knowing the fact that I was one of the most senior former
26 commanders of ULIMO-K and I knew very well that the various
27 warring factions, they didn't disarm totally so if arms were in
28 Lofa and I didn't come out as the first person to inform the
29 former leader about it at that time, if it was discovered then he

1 would not have confidence in me. That was the reason why I met
2 him personally and told him. I said, "It is necessary for me to
3 take an assignment in Lofa so that I can look around if I can
4 find some arms because some people did not disarm."

16:06:51 5 Q. Very well. As I said. I am not going to spend time over
6 that because it is a minor dispute, but if we can stick with this
7 page please and the second paragraph.

8 "The witness went to Lofa County and met with former
9 ULIMO-K officers and leaders. He told them that the war was
16:07:09 10 over, that Taylor was now the President of the country and that
11 they had no choice but to cooperate with his government and
12 disarm. They also discussed possibility for some of the former
13 ULIMO-K commanders to accept employment in the Taylor's
14 government. Most of them agreed to give away arms and ammunition
16:07:28 15 to the witness for Charles Taylor and they put together over a
16 period of two weeks 10 pick-up trucks full of arms and
17 ammunition. The arms and ammunition were taken to Monrovia in
18 several shipments. The witness also recovered a 107 millimetre
19 Howitzer from Bopolu forest in Bopolu County. It was cannon that
16:07:58 20 belonged to the ULIMO-K faction and was turned over to
21 Charles Taylor as one of the shipments." Is that correct?

22 A. Yes.

23 Q. "Charles Taylor was impressed and with Benjamin Yeaten,
24 Momoh Jibba, Musa Ija" - do I need to spell that given that we
16:08:16 25 have the documents, your Honour? Do you think I ought to spell
26 it into the record?

27 PRESIDING JUDGE: No, it is not necessary.

28 MR GRIFFITHS:

29 Q. "With Benjamin Yeaten, Momoh Jibba, Musa Ija and General

1 Jackson they went to see the arms and ammunition brought from
2 Lofa County. Musa Ija took control of the first convoy, the
3 other convoys were handed over to Leo Mento in a location
4 situated in Monrovia where the German embassy is located today.

16:08:51 5 Leo Mento was the senior bodyguard commander of Joe Montgomery."
6 Pause there, is that the truth?

7 A. Yes.

8 Q. Now, again I don't want to delay long over this, but I have
9 to deal with a little objection with you. What is the location
16:09:14 10 close to the German embassy that you are referring to there?

11 A. When I mean German embassy, the house is close to German
12 embassy. I don't know if it is part of the embassy. That
13 I don't know, but that was the area where he was living first
14 before he moved to the new area we call White Flower.

16:09:47 15 Q. You see the reason why I am delaying slightly over this is
16 this: Yesterday you explained to us that those arms were taken
17 to President Taylor's address by the German embassy and I would
18 just like to pause to enquire, when we look at this passage why
19 does it read, "A location near the German embassy" rather than
16:10:18 20 Charles Taylor's house?

21 A. I said yesterday the house is close to German embassy.
22 I said it yesterday.

23 Q. No, I am asking about this passage. Contained in an
24 interview conducted with you on 29 and 30 November 2006 and 4
16:10:42 25 December 2006 and the very same gentleman sitting directly across
26 the room, Mr Werner, was present. You said to them, "Taken to a
27 location situated in Monrovia." My question is very simple. Why
28 didn't you just say Mr Taylor's house?

29 A. The arms and ammunition that were taken, they were taken to

1 Mr Taylor's house and that house was very close to German
2 embassy.

3 Q. Was it to Mr Taylor's house that you took the arms?

4 A. Yes.

16:11:32 5 Q. Why didn't you say so in this passage?

6 A. I told you earlier that these things have taken almost 17,
7 18 years now. My brain is not a computer to remember all the
8 dates to say which dates this one took place or which date that
9 one happened. Sometimes some of the things slip off my mind. My
16:11:58 10 head is not a computer.

11 Q. That is about the sixth time you have given me that answer.
12 Were you coached to give me that answer by anyone?

13 A. Please repeat that question.

14 Q. Were you coached to give me the answer, "My head is not a
16:12:17 15 computer"?

16 A. No.

17 Q. In the several days in which you spent time with
18 prosecutors last week were you told to give that answer if a big
19 bad defence advocate keeps pressing you on a point? Were you
16:12:37 20 told that?

21 A. Nobody told me anything.

22 Q. Let us see if we get that answer again and for the final
23 time I am going to ask you: Why did you not mention Mr Taylor's
24 house in this paragraph?

16:13:02 25 A. When I said the house is close to the German embassy I was
26 referring to Mr Taylor's house.

27 Q. Very well. I am not going to waste time on that. Let us
28 go to the next paragraph:

29 "For the rest of the arms and the ammunition handed over by

1 the former ULIMO-K commanders Leo Mento and the witness went
2 together to Voinjama in Lofa County. Leo Mento stayed there
3 while the witness went to pick up the arms and ammunition. Then
4 the witness handed over the arms and ammunition to Leo Mento who
16:13:46 5 brought the shipment back to Monrovia with the witness's driver
6 and bodyguard. The shipment was handed over to Joe Montgomery.

7 The witness does not know what exactly happened with these
8 weapons and ammunition but knew that they were brought in a place
9 near White Flower in Monrovia. He heard that from his driver and
16:14:10 10 his bodyguard." Pause there.

11 THE INTERPRETER: Your Honours the Liberian Krio
12 interpreter is still reporting that the counsel is reading too
13 fast for his pace.

14 PRESIDING JUDGE: Perhaps we can go over that text, again
16:14:36 15 Mr Griffiths.

16 MR GRIFFITHS: Very well your Honour.

17 Q. I am picking it up, witness, just below halfway: "For the
18 rest of the arms and ammunition handed over by the former ULIMO-K
19 commanders Leo Mento and the witness went together to Voinjama in
16:15:04 20 Lofa County. Leo Mento stayed there while the witness went to
21 pick up the arms and ammunition. Then the witness handed over
22 the arms and ammunition to Leo Mento who brought the shipment
23 back to Monrovia with the witness's driver and bodyguard. The
24 shipment was handed over to Joe Montgomery.

16:15:34 25 The witness does not know what exactly happened with these
26 weapons and ammunition but knew that they were brought in a place
27 near White Flower in Monrovia. He heard that from his driver and
28 his bodyguard." Pause there, which place near White Flower?

29 A. The residence of Mr Taylor was where we referred to as

1 White Flower.

2 Q. My question is very simple. Which place near White Flower?

3 A. When I said near White Flower it was Joseph Montgomery's
4 residence and Benjamin Yeaten's residence at the back of White
16:16:37 5 Flower. There was not any house in between them so they were
6 almost considered as the same White Flower, because just when you
7 go behind at the back of Mr Taylor's house you see Joseph
8 Montgomery's house and then Benjamin Yeaten's house and then on
9 the other side you find my own house.

16:16:59 10 Q. So in truth that passage ought to read: "The weapons were
11 taken to Joe Montgomery's house at the back of White Flower",
12 shouldn't it?

13 A. The second time, the first one was taken to Mr Taylor's
14 house. It was the second one that I took to Joseph Montgomery's
16:17:36 15 house.

16 Q. Let us go on, shall we. The last two lines on that page:
17 "After having made the necessary arrangement for these 10
18 truckloads of arms and ammunition to be available for Taylor, the
19 witness returned to Monrovia. But he left his junior officer on
16:18:00 20 the ground in Lofa County to carry on looking for more arms and
21 ammunition.

22 Around the end of 1997 the witness made a second trip
23 outside Liberia with Charles Taylor and went with him to Togo for
24 an ECOWAS meeting."

16:18:23 25 I will leave it there for the moment, but would you agree
26 that money was provided by the government of President Taylor to
27 purchase arms from former combatants?

28 A. Money was provided to be given to whom?

29 Q. To former ULIMO fighters to persuade them to give up their

1 weapons?

2 A. He stated to me that he provided some money to Sam Bockarie
3 and he would now get some arms and ammunition in a Lofa area but
4 no money was given to me for that. Mine was free. All the arms
16:19:24 5 and ammunition that I got I brought them free, except for monies
6 he took and gave to me personally, that this is for me.

7 Q. Let me just be clear about this, at no stage were you given
8 money by President Taylor to purchase arms from former ULIMO
9 combatants?

16:19:52 10 A. He did not give money to me to buy arms from former ULIMO
11 fighters. He gave me money several times. He gave me 350 bags
12 of rice and he said I should take them to Lofa to whoever I could
13 distribute them to. All the times he would call on me I would go
14 and he would give me money. One time he gave me money and he
16:20:22 15 said that this money is for me to encourage all my former
16 fighters, but he didn't tell me that this money is for me to go
17 and buy arms. I did not give 5 cents to anybody for arms.

18 Q. Would you regard the disarmament process in Lofa County and
19 other territories formally controlled by ULIMO as a success?

16:21:03 20 A. I did not get that clear. Please repeat.

21 Q. Did you regard the recovery of weapons from former ULIMO
22 combatants as a success?

23 A. I regarded it as a success.

24 Q. But despite that fact that area of Lofa County remained
16:21:33 25 quite unstable throughout President Taylor's presidency, didn't
26 it?

27 A. It remained unstable. That was the best way we handled it,
28 by me going to make sure and to get the arms and ammunition and
29 bring it forward.

1 Q. I agree with that, but despite all those efforts the area
2 remained quite unstable, that area of Lofa County?

3 A. It was not stable, yes.

16:22:22

4 Q. Indeed, in part because of its isolation it was a very
5 difficult area to control?

6 A. Yes.

7 Q. Did the RUF buy arms from ULIMO?

8 A. Yes.

16:22:52

9 Q. And they bought arms from ULIMO between 1992 and 1997,
10 didn't they?

11 A. No, from the end of 1997 to 2003.

12 Q. I am suggesting that between 1992 and 1997 the sale of arms
13 by ULIMO fighters to the RUF was quite a thriving business. Do
14 you agree?

16:23:22

15 A. No ULIMO had no contact with RUF. They remained fighting
16 in the Foya area until 2000 or 1996.

17 Q. I have two more questions for you before I end this
18 chapter. The first is this: Yesterday you told us some of the
19 arms recovered from Lofa County were distributed to the police
20 and soldiers, is that right?

16:23:53

21 A. Yes.

22 Q. And that was because there was a shortage of weaponry to
23 equip the police and soldiers, wasn't it?

24 A. Yes.

16:24:10

25 Q. And furthermore much of the arms and weapons recovered were
26 kept by ECOMOG and the UN, weren't they?

27 A. Can you repeat that?

28 Q. Most of the arms and recovered weapons you referred to from
29 Lofa County and elsewhere were kept by ECOMOG and the United

1 Nations, weren't they?

2 A. No.

3 MR GRIFFITHS: I don't know, your Honour, if that would be
4 a convenient - I am perfectly happy to continue for another five
16:24:55 5 minutes.

6 PRESIDING JUDGE: Are you going into a new area?

7 MR GRIFFITHS: I am going into a new area, but it is a
8 fairly short area, your Honour. I could complete it in five
9 minutes.

10 PRESIDING JUDGE: [Microphone not activated] we only have
11 five minutes left of the tape.

12 MR GRIFFITHS: I might be able to complete it in that
13 period. Let me try.

14 Q. I am moving now, witness, from the general to the
16:25:25 15 particular, but before I do so I want to ask you if you agree on
16 a number of propositions. Do you follow me?

17 A. Yes.

18 Q. Firstly, you were never a guest at President Taylor's
19 house?

16:25:48 20 A. That is not true.

21 Q. Either when he lived next to the German embassy or when he
22 moved to White Flower?

23 A. Please repeat that.

24 Q. Were you a guest in President Taylor's house either at
16:26:12 25 White Flower or when he lived up until January 1999 at a house
26 just by the German embassy?

27 A. That is not true. He is not supposed to invite me. I was
28 the assistant director for operation and in charge of his
29 security day and night, unless when I am sick then I can ask my

1 director that I will not be able to come to the job today, but
2 besides that every day, before he wakes up to come outside I am
3 standing by his door and I am [indiscernible] afternoon I brought
4 him back up to the time I was at the Executive Mansion. That
16:26:56 5 happens every day.

6 MR GRIFFITHS: I am sorry, your Honour, but given that we
7 suggest that this man is lying about that it is going to take a
8 lot longer than five minutes. So perhaps that might be a
9 convenient time.

16:27:10 10 PRESIDING JUDGE: This will be a good place to begin
11 tomorrow. Mr Witness, we are now going to adjourn until
12 tomorrow, 9 o'clock. As usual I will caution you not to discuss
13 your testimony with anyone. Court adjourns to tomorrow at
14 9 o'clock.

16:27:31 15 [Whereupon the hearing adjourned at 4.27 p.m.
16 to be reconvened on Friday, 11 January 2008 at
17 9.00 a.m.]
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I N D E X

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