



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 10 MARCH 2008
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr William Romans
Ms Sidney Thompson
Ms Doreen Kiggundu

For the Registry:

Ms Rachel Irura

For the Prosecution:

Ms Brenda J Hollis
Mr Mohamed A Bangura
Mr Nicholas Koumjian
Mr Alain Werner
Ms Maja Dimitrova

**For the accused Charles Ghankay
Taylor:**

Mr Terry Munyard
Mr Morris Anyah

1 Monday, 10 March 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:30:22 5 PRESIDING JUDGE: Good morning. I note appearances are as
6 on Friday. I don't think there are any changes. In that case,
7 unless there are other matters, I will remind the witness of his
8 oath.

9 Mr Witness, I again remind you this morning as I've done on
09:30:42 10 other mornings that you have taken the oath to tell the truth.
11 The oath is still binding on you and you must answer questions
12 truthfully. Do you understand?

13 THE WITNESS: Yes.

14 WITNESS: TF1-337 [On former oath]

09:30:57 15 PRESIDING JUDGE: Mr Munyard, please proceed.

16 MR MUNYARD: Thank you, your Honour. Good morning, Madam
17 President. Good morning, your Honours. Good morning, counsel
18 opposite.

19 CROSS-EXAMINATION BY MR MUNYARD: [Continued]

09:31:06 20 Q. Good morning, Mr Mansaray. Mr Mansaray, you'll remember on
21 Friday when we broke off we were talking about your contact with
22 the Office of the Prosecutor and the witness management unit in
23 the year of 2006 and you were telling us that you had assistance
24 from the Prosecution during 2006 not just in relation to your
09:31:37 25 visits to Freetown to see them to be interviewed but also for
26 other reasons and you mentioned the fact that you had gone to
27 sort out something to do with a passport photograph. Do you
28 recall telling us that, you'd gone to Bo to sort out your
29 passport photograph?

1 A. Yes.

2 Q. I'm just going over the last part of your evidence on
3 Friday just to remind you where we'd got to before we broke off
4 for the weekend. Now you recalled going to have your passport
09:32:22 5 photograph sorted out as being in August because I told you that
6 in August you received two sums of 25,000 leones on 23 and 28
7 August and you thought that that was to do with going to sort out
8 your passport photograph. Do you remember telling us that?

9 A. It was not in August.

09:32:56 10 Q. When do you now say it was?

11 A. I can remember it was in July 2007.

12 Q. All right. Well, we'll come to July 2007 in due course.

13 Do you agree that in August of 2006 as well as being given
14 250,000 leones for your children's school fees, uniforms, et
09:33:47 15 cetera, that you were also given two sums of 25,000 leones to
16 cover transport on 25 and 28 August? I'm not suggesting you will
17 remember the precise dates, but do you remember in August
18 receiving two separate sums of 25,000 leones each for transport
19 costs?

09:34:17 20 A. They only gave me 25,000 leones for transport and there was
21 a document to the effect.

22 Q. Are you talking about August 2006?

23 A. Yes, it was August 2006.

24 Q. You see we've been supplied with the document that sets out
09:34:43 25 all the payments that were made to you by the Prosecution and I
26 can certainly show you a copy, but on 23 August and on 28 August
27 it is said that you received 25,000 leones on each of those two
28 occasions. Would you like to see the document?

29 A. As long as it bears my signature it could be correct,

1 because whatever money they gave to me I signed them, so as long
2 as it bears my signature it is correct.

3 Q. Right, what we've been supplied with doesn't include the
4 actual receipts so if you want to see the actual receipts with
09:35:36 5 your signature they will have to be obtained. I'm going to move
6 on from August of 2006 to November of 2006. Were you interviewed
7 in November 2006 over a period of four days? I want to make it
8 clear I'm asking you the question, I'm not suggesting necessarily
9 that you were interviewed in November, I just want to know if you
09:36:16 10 can help us with why you would have received a payment in
11 November 2006?

12 A. Yes, I can remember it was in Bo.

13 Q. And were you interviewed then or what went on then?

14 A. I told them about a health problem and they invited me to
09:36:47 15 Bo. When I got there they asked me about the condition.

16 Q. And what, if anything, did they do for you in relation to
17 that health problem?

18 A. They gave me a transportation fare to return and gave me
19 time and they said they would inquire if I spoke the truth to
09:37:16 20 them.

21 Q. Did they assist you at all in relation to your health
22 problem in 2006?

23 A. No, they only gave me transportation cost. It was later
24 that they assisted me.

09:37:44 25 Q. Can you now remember when it was that they assisted you in
26 relation to your health problem?

27 A. Yes.

28 Q. When was that?

29 A. It was in February 2007.

1 Q. Right. Well, I'm going to just go through the remaining
2 payments that we've been told about for 2006. We've dealt with
3 August. On the document that we've been given on 28 November
4 2006 you were paid 60,000 Leones under the category of lost
09:38:31 5 wages, but the reason that's given is payment for four days
6 meals. I think we touched on that actually on Friday. Can you
7 remember that? Late November 2006 before they ever gave you any
8 money for your health problem can you remember being paid either
9 for lost wages or for four days worth of meals?

09:38:59 10 A. Well, I cannot remember that.

11 Q. If you were paid for four days meals that suggests, does it
12 not, that you spent four days engaged with the Prosecution?

13 A. I don't believe so.

14 Q. Mr Mansaray, are you saying that you don't believe that you
09:39:32 15 spent four days with the Prosecution in November 2006?

16 A. I cannot remember.

17 Q. We've been told by them that they paid you 60,000 Leones
18 and the reason that's given is payments for four days meals,
19 although it's also listed as lost wages, but that might simply be
09:40:06 20 a general title under which four days meals is paid for. Can you
21 remember getting money for four days worth of meals in late 2006?

22 A. Okay, yes, I can remember. That was the time I was on
23 treatment in Bo.

24 Q. Well, on 6 December for emergency medical treatment for
09:40:57 25 yourself on 2 and 6 December you were given a total of 260,000
26 Leones. Now that money was paid to you for emergency medical
27 treatment that you had to have on that day, 6 December, and four
28 days previous on 2 December. So that on the face of it wasn't
29 anything to do with the payment for four days meals in late

1 November, was it?

2 A. No, I have now recalled it. I was there on treatment.

3 They assisted me, they paid that money.

09:42:01

4 Q. Do you accept that in the light of the document that the
5 Prosecution have given us that you were paid 60,000 leones in
6 late November for four days meals?

7 A. Well, the 60,000 was for the eye operation that I underwent
8 and later they assisted me again for the time that I spent in Bo.
9 I had nothing, I was on treatment, so they gave me money for
10 feeding.

09:42:37

11 Q. All right. And was the emergency medical treatment for
12 your eye?

13 A. Yes. It was my eye and my teeth.

09:42:59

14 Q. And did you have two separate lots of medical bills that
15 the Prosecution paid for - sorry, assisted you with?

16 A. Yes.

17 Q. And that's the total of 260,000, is it?

18 A. Yes.

09:43:23

19 Q. Now on 14 December 2006 we're told that you were given
20 40,000 leones for transport for your fare, I presume, from your
21 home to Bo and back upon invitation to meet witness management
22 unit staff to sort out documentation issues. Now that's a rather
23 long way of saying that you were paid the cost of your transport
24 to see people to sort out your documents. Can you remember going
25 in December to sort out your documents?

09:43:57

26 A. Yes, I can remember I met with some staff and they assisted
27 me and paid my transportation cost.

28 Q. And from what you've told us this morning that wasn't the
29 time when you went to sort out your passport photo. Is that

1 right?

2 A. Yes, that was not the time.

3 Q. It was other documents you were sorting out then, was it,
4 in December 2006?

09:44:50 5 A. Yes, it was for some other different arrangement. It was
6 not for a passport photo.

7 Q. All I want to know is was it anything to do with the
8 Special Court or were these simply documents that you wanted to
9 sort out that they gave you some help with, nothing to do with
10 the Court?

11 A. Well, I made a request for assistance and that was why they
12 called me to interview me.

13 Q. I see. Well, just finally in relation to the end of 2006
14 if the Office of the Prosecution had not been able to give you
09:45:55 15 260,000 Leones for your medical treatment would you have been
16 able to pay for that medical treatment yourself?

17 A. Well, I would have tried because I was not expecting
18 Special Court to have come to Sierra Leone, but then they came
19 and when I was with them, when I assisted them to testify, so in
09:46:28 20 return they told me if I had a problem they would assist me.
21 They were humanitarian enough, they are human enough so they
22 assisted me.

23 Q. Yes, now the question I asked you was a rather different
24 one. I asked you if they had not come up with the 260,000 Leones
09:46:54 25 for your medical treatment in December 2006 would you have been
26 able to pay that money yourself from your own resources?

27 A. I would have tried, but at that moment when I hadn't the
28 opportunity that's why I told them and they assisted me, but at
29 that time I hadn't the opportunity.

1 Q. Does that mean that you didn't have the money to pay
2 yourself for your medical problems?

3 A. Yes.

09:47:46 4 Q. I want to move now to 2007. Did you have more medical
5 assistance from the Prosecution in 2007?

6 A. Yes.

7 Q. Did you receive medical assistance from them for both
8 yourself and your wife in 2007?

9 A. Yes.

09:48:07 10 Q. I think in February of 2007 you received 225,000 Leones on
11 8 February and another 225,000 Leones on 22 February for medical
12 assistance for both you and your wife. Do you agree?

13 A. Yes, it was for my wife at that time.

09:48:51 14 Q. Well, according to the document that we've been given it's
15 medical assistance rendered to both you, the witness, and your
16 wife. I'm not asking you about what the medical problems were, I
17 don't need to know that, but do you agree that you were given
18 money on both of those occasions for medical assistance rendered
19 not just to your wife but to you too?

09:49:17 20 A. February, it was for my wife. It was my wife's medical
21 bill. After she had undergone an operation they paid that.

22 Q. And in February therefore they paid you 450,000 Leones for
23 her medical bills. Is that right?

24 A. Yes.

09:49:41 25 Q. Were you interviewed by the Prosecution in March of 2007?

26 A. Well, I have forgotten a little regarding March.

27 Q. Or did you go and see them in March of 2007 even if you
28 weren't interviewed by them?

29 A. Well, that one I have forgotten.

1 Q. In the document we've been given it says that on 10 March
2 2007 a payment was made to you for meals and transportation to
3 enable you to travel from somewhere, we're not told where, and
4 they gave you 30,000 leones. Can you remember in March of 2007
09:51:01 5 going somewhere that was - the transport costs of which were paid
6 by the Prosecution?

7 A. That one really I cannot recall.

8 Q. But again do you accept that you received that money?

9 A. That's what I'm telling you. I have forgotten. If there
09:51:43 10 is a document to the effect then I can remember the event or
11 whatever could have happened at that time, I could have recalled,
12 but that month I cannot recall.

13 Q. Mr Mansaray, do you appreciate that what I'm reading from
14 is a document supplied to us by the Prosecution telling us the
09:52:01 15 money that they paid to you? You understand that's what I'm
16 reading from?

17 A. Well, I know you are reading from a document, but if it has
18 my signature on it I would accept it because human beings can
19 make mistakes.

09:52:25 20 Q. The problem for us is we don't have the actual receipts
21 with your signatures on them, all we have is a summary of the
22 monies that were given to you by the Prosecution. This isn't
23 something that the Defence have found somewhere, it's something
24 the Prosecution has given us openly. Do you follow?

09:52:51 25 A. Yes, I can hear you.

26 Q. July of 2007, can you remember any dealings with the
27 Prosecution then?

28 A. Yes.

29 Q. What did you do with the Prosecution in July of 2007?

1 A. Well, they came, took me from my home town and took me to
2 Bo and I filled a document, a passport document.

3 Q. Is that all that happened in July of 2007?

4 A. No, they paid a medical bill for my child.

09:53:51 5 Q. How many medical bills did they pay in July of 2007?

6 A. They paid one medical bill, about 150,000 leones.

7 Q. Can you remember them paying another medical bill in July
8 of 2007? Sorry, can you remember them paying another medical
9 bill that year, 2007?

09:54:29 10 A. Yes, it was November to December they paid a medical bill
11 for me.

12 Q. And do you remember now how much that was?

13 A. Yes, it was 195,000.

14 Q. Let me just put to you what I've got here for July of 2007
09:55:08 15 and see if you agree with this. That on 3 July 2007 you were
16 paid 20,000 leones for meals. Do you remember that?

17 A. Yes.

18 Q. And where were you when your meal was either being paid for
19 or you were being given to pay for your meals on 3 July 2007?

09:55:38 20 A. They brought me to Bo. I was in Bo that night when they
21 gave me that money.

22 Q. On 4 July 2007 they gave you 150,000 leones in medical
23 expenses, 35,000 leones for transport/lost wages, 25,000 leones
24 for documents, passport photographs, and 120,000 leones for
09:56:14 25 accommodation. A total of 330,000 leones. Now I just want to

26 ask you first of all about the medical expenses there. How would
27 you have paid for those medical expenses if the Prosecution
28 hadn't given you that money?

29 A. It would have been difficult for me. I hadn't the

1 opportunity at that time.

2 Q. 120,000 leones accommodation. How long were you
3 accommodated for by the Prosecution in early July of 2007?

4 A. Well, I'm not sure that it was up to that amount, because
09:57:19 5 what they gave me for that lodging, whatever they gave to me they
6 would give me a document on which I signed, so I don't think if
7 it was up to that amount that you've just mentioned.

8 Q. Well, that's the amount that they've told us that they paid
9 you, but I'm asking you really about the amount of time that you
09:57:40 10 spent. How many nights accommodation was required for you in Bo
11 in July of 2007? Was it one night or more than one night?

12 A. It was more than one night.

13 Q. How many, can you recall?

14 A. It was two.

09:58:05 15 Q. And they paid your transport costs or was it lost wages?
16 We've got it down as transport/lost wages, so it could be
17 either/or or both. Can you help us with what it was?

18 A. Well, they paid my transport and the time they met me I was
19 doing farming. They asked me what I was doing when they met me
09:58:45 20 and I told them I was doing farm work, that was where I got money
21 to take care of my family.

22 Q. And the passport photographs, why did you need passport
23 photographs?

24 A. Well, I did not request for that. They were in need of me
09:59:10 25 and they went and took me - they asked me to come and take
26 passport pictures. I did not request that.

27 Q. I understand. So if they had not asked you to get a
28 passport to travel to The Hague would you have been getting a
29 passport then anyway?

1 A. No.

2 Q. Now you told us that later in the year they paid you
3 another sum for medical expenses. Can you just tell us again how
4 much you think that was?

09:59:49 5 A. Yes. It was November to December 2007. They gave me
6 195,000 leones.

7 Q. Now 195,000 euros is a very specific sum to remember --

8 PRESIDING JUDGE: He said leones, Mr Munyard.

9 MR MUNYARD: Sorry, have I done it again?

10 PRESIDING JUDGE: Yes. It's a different - well, I'll not
11 bother with the calculation.

12 MR MUNYARD:

13 Q. 195,000 leones, Mr Mansaray, is a very specific figure to
14 remember. Are you quite sure that it was 195,000 local currency?

10:00:46 15 A. Yes, because the medical bill for my wife and I, it was
16 around 194, but in the office the staff who - to whom I paid told
17 me they hadn't 1,000 leones change, so the staff just took the
18 195,000 leones without giving me the change.

19 Q. And you're quite sure about that, are you?

10:01:19 20 A. Yes.

21 Q. The reason I'm asking you about this is because we have on
22 this document the following: 28 July 2007 for medical bills,
23 amount 107,000 local currency paid on 27 November 2007. Then the
24 next receipt dated 15 August 2007 for medical bills, 86,000 local
10:02:07 25 currency paid on 27 November 2007.

26 You're quite right. Well, I'm not sure about the
27 mathematics, but it's certainly over 190,000 leones. Now are you
28 able to tell us why those bills were paid in November even though
29 the receipts are dated July and August 2007? Was this medical

1 treatment that you had in July and August 2007 but they didn't
2 pay until the end of the year?

3 A. Yes.

10:02:52

4 Q. Again I don't want to know what the medical treatment was,
5 I just want to understand why the documents have these different
6 dates on them?

7 A. Well, it was the way the treatments were done. That's why
8 the dates are different.

10:03:20

9 Q. All right. I'm not too concerned about the dates. Again
10 do we understand that if the Prosecution had not paid those
11 medical bills that you yourself would not have been able to
12 afford them?

13 A. Well, at that moment there was no way I could pay. That's
14 why I asked them to assist me.

10:03:46

15 Q. All right. Then in October of 2007 you were interviewed
16 for the only time that year and were you interviewed in your home
17 town or were you interviewed elsewhere?

18 A. It was in Freetown at the Special Court office. That was
19 where I was interviewed, October 2007.

10:04:24

20 Q. And we know that on 2 October you were paid for a meal
21 10,000 Leones whilst travelling to Freetown?

22 A. Yes.

23 Q. You were interviewed on the 4th and again on the 8th and
24 again on the 15th October so does it follow again that you stayed
25 in Freetown for those interviews?

10:04:55

26 A. Yes, I was in Freetown.

27 Q. Between the 2nd or 3rd and the 15th. Now I'd just like to
28 ask you about the other payments in October of 2007. We are told
29 that on 6 October payment was made for one night's accommodation

1 for you and that sum was 100,000 Leones. Help us with this: Was
2 that money that you had already spent and you needed them to
3 reimburse you for or did they just pay the costs of your
4 accommodation and you never had to hand out any money at all to
10:05:58 5 the place where you were staying?

6 A. I don't think it was that. They did not give me money that
7 was 100,000 for accommodation.

8 Q. Well, that's what it says here but can you help us with
9 this: Were you given money, was money put into your hand to
10:06:25 10 reimburse you for what you had paid for your accommodation or
11 were the Prosecution simply looking after the cost of that
12 themselves without troubling you about it?

13 A. I can only remember from 3 October they met me in my home
14 town, they brought me to Bo and paid for my accommodation for one
10:07:00 15 night and the next morning I came to Freetown. There they lodged
16 me in Freetown.

17 Q. And you stayed there until the 15th?

18 A. Yes.

19 Q. Do you remember being interviewed on three separate dates
10:07:22 20 in October last year?

21 A. Well, I can remember. Maybe it was more than three times.

22 Q. On 8 October you were given 50,000 Leones and the reason
23 that's given is this: That it was required for emergency support
24 whilst you were in Freetown for prepping. Now prepping may not
10:07:55 25 mean anything to you, but we'll say for interview. And the
26 category that's given is family. Was there some emergency
27 support that your family needed whilst you were in Freetown being
28 interviewed?

29 A. Yes.

1 Q. I don't need to know what the emergency was, but did it
2 relate to your family back in your home town or was it something
3 to do with you?

4 A. Well, the time they went and took me they said they had no
10:08:42 5 money for feeding for my - for either my family or myself. So
6 they brought me for the prepping. So what they had for the
7 prepping for me was where they took the 50,000 leones and sent it
8 for my family.

9 Q. So how would you have supplied your family with that money
10:09:09 10 if you hadn't been in Freetown for prepping?

11 A. I was doing farming. It was from there we got our living.

12 Q. So this really amounts to loss of wages from which you
13 would have supported your family had not been away in Freetown.
14 Is that right?

10:09:35 15 A. Well, I cannot refer to that as salary. What they gave to
16 me for daily meals, that was - it was out of that that I decided
17 to send some for my family.

18 Q. And on the same date you were paid 5,000 leones for a meal
19 whilst you were travelling from one place to another. Now we
10:10:05 20 know that on 8 October you were interviewed for the second time
21 in October last year. Did you have to travel from one place to
22 another in order to be interviewed?

23 A. No.

24 Q. And two days later on 10 October were you given a cell
10:10:37 25 phone?

26 A. Yes, they gave me a mobile phone.

27 Q. And did they pay what it cost to make the calls on that
28 phone?

29 A. They only gave me the phone and the SIM card which they

1 bought and placed in the phone.

2 Q. And so did the SIM card have a certain amount of call usage
3 on it? In other words, because of the SIM card were you able to
4 make calls without having to pay yourself?

10:11:34 5 A. The credit that was on the SIM card initially, I used it
6 for the time that was - that I had it for that short time. But
7 later I kept - I bought the credit for myself.

8 Q. So they paid for the phone and initially you had credit on
9 the SIM card but later on you had to pay for credit yourself?

10:12:01 10 A. Yes.

11 Q. We are told that either you were given or it cost 140,000
12 leones for the cell phone with the SIM card. Do we follow from
13 what you've told us that you didn't actually get 140,000 leones
14 to buy it, but that it was given to you complete?

10:12:30 15 A. Yes, they gave me the mobile phone.

16 Q. And did you get any money for that or not?

17 A. After the prepping they gave me the transport cost to
18 return home.

19 Q. And we know that the last occasion in October when you were
10:12:54 20 prepped by them was the 15th and you were then - are you telling
21 us now that you were then given money to cover the cost of
22 transport home?

23 A. Yes.

24 Q. Were you given any money for meals on the journey home?

10:13:20 25 A. Yes, everything was included in the transport fare that
26 they gave to me and they also gave to me 10,000 to use for food
27 on the way.

28 Q. And that is some time on or after 15 October last year, the
29 last day that you were interviewed in October last year? I'm

1 sorry, the last day I think is 16 October. Can you remember the
2 last day that you were interviewed, what the date was?

3 A. I cannot remember the exact date on which I was
4 interviewed, but it could be around that 15th, 16th and 17th.

10:14:28 5 Q. According to the document that I've got, 16 October 2007 at
6 10.30 prepping resumed. So I was wrong to say the last day was
7 the 15th, it appears as though it was the 16th. I don't think
8 you'd dispute that, would you, Mr Mansaray?

9 A. Yes, I cannot dispute that because --

10:15:00 10 Q. Yes. Sorry, I thought I was interrupting your answer. One
11 thing though that you are clear about from what you've just told
12 us is that after the interviews or prepping in October you were
13 then given another sum of money to cover your costs home. That's
14 right, isn't it?

10:15:27 15 A. Yes.

16 Q. And that was the - 4 October was the sixth time that you
17 were interviewed by the Prosecution. The interview then
18 continued on 5 October which would be the seventh time. You
19 don't mention seeing Charles Taylor in the Bomi Hills until 5
10:16:17 20 October 2007, your seventh interview with the Prosecution. Why
21 did it take you so long to remember that, Mr Mansaray, if it
22 actually happened?

23 A. Well, it happened, it had been in my statements, even the
24 previous interviews, so I just thought that since I had said it
10:16:46 25 in my previous statements, or even if I was late to say so in the
26 interview, it happened and I've been talking about it.

27 Q. Will you take it from me that it's not in any of your
28 earlier interviews; your claim that you saw Charles Taylor in the
29 Bomi Hills?

1 A. But I had been saying so in my statements. This was - this
2 is my first time, I don't know, I didn't know about courts, the
3 procedures and whatever, so what I thought was important was that
4 I said it in my statements and there were sometimes I could make
10:17:35 5 mistakes, I couldn't recall everything at the same time.

6 Q. But seeing Charles Taylor was quite a dramatic event,
7 wasn't it? Something that you would remember, is what I mean?

8 A. Yes, because at that time he - at that early time he was a
9 leader, the time that I was referring to, 1991. Yes, it was.

10:18:03 10 Q. And yet it's not until interview number seven that you
11 remember to tell them that you saw him there?

12 A. Well, just as I told you, sometimes when I would come for
13 those interviews I would make mistakes because I would think
14 about a lot of problems that I had left back home, so it was not
10:18:31 15 that I could recall everything accurately because I also had some
16 other problems that I thought about back home.

17 Q. Mr Mansaray, you are then interviewed again on 8, 15 and 16
18 October. So you're interviewed quite a few times in October of
19 2007. Then we move to 2008 and you're interviewed on 24, 25 and
10:19:10 20 28 January of this year. Can you recall where you were when you
21 were interviewed in January this year?

22 A. Yes.

23 Q. Can you tell us where you were?

24 A. I was in Freetown.

10:19:38 25 Q. How did you get to Freetown?

26 A. Well, I used to feel pain in my teeth so I complained to
27 the Special Court staff so they asked me to come to Freetown. So
28 they - when I came to Freetown, after the treatment they said I
29 should be interviewed.

1 Q. So they were going to pay more medical bills for you, is
2 that what you're telling us?

3 A. Yes, they took me to the hospital. They footed the bill at
4 the hospital.

10:20:28 5 Q. Can you recall how much that was?

6 A. Well, I cannot tell because they paid the money and I was
7 under treatment at that time.

8 Q. Well, how much time did you have to spend at the hospital?

9 A. It was more than a week. They will take me to the
10 hospital, after treatment I will come to my house, after two or
11 three days after some rest we would go there again. I was not
12 admitted in the hospital. I was home. They would just take me
13 there for treatment.

10:21:03 14 Q. And was this hospital at your home or was it in Freetown, I
15 haven't quite followed?

16 A. It was in Freetown.

17 Q. So when you say after treatment I would go home, you mean
18 you would go back to the place where you were staying in
19 Freetown?

10:21:45 20 A. Yes, where they lodged me at the private house. That's
21 what I mean.

22 Q. Again if the Prosecution had not paid your medical bills in
23 January of this year would you have been able to afford them?

24 A. No.

10:22:09 25 Q. And have you any idea even in rough terms how much it would
26 have cost for all that medical treatment in January?

27 A. Well, it could have been more than 50 to 70,000.

28 Q. Could it have been more than that?

29 A. Yes, because it was not only once. I underwent the

1 treatment twice for --

2 THE INTERPRETER: Your Honours, the witness has used a word
3 that could be tooth or teeth. Can he clarify?

4 PRESIDING JUDGE: Mr Witness, the interpreter wants you to
10:23:05 5 clarify do you mean one tooth or more than one tooth?

6 THE WITNESS: More than one.

7 MR MUNYARD:

8 Q. You were being accommodated for over a week and presumably
9 your meals were provided for you. Is that right?

10:23:27 10 A. Yes, they used to give me meals.

11 Q. Were you given any payments though either for loss of wages
12 or family support or anything else?

13 A. No.

14 Q. So in addition to transporting you to Freetown,
10:23:51 15 accommodating and feeding you are you saying that the only
16 additional sum they paid then was for your medical treatment?

17 A. Yes.

18 Q. And can you remember when in January you went back home
19 from Freetown, or did you go back home from Freetown?

10:24:35 20 A. No.

21 Q. Did you stay in Freetown until you left by air to come here
22 to The Hague?

23 A. Yes.

24 Q. Right. Well, I want to ask you about the next interview
10:24:55 25 which was on 31 January this year. Were you still in Freetown or
26 had you left for The Hague by then?

27 A. I was in Freetown.

28 Q. Who was providing for your family while you were in
29 Freetown in late January?

1 A. Well, they lived from out of the farming that we did.

2 Q. Well, it was you who was doing the farming, wasn't it,
3 Mr Mansaray, and you're away in Freetown being proofed or prepped
4 or whatever the word is?

10:25:47 5 A. Well, I have some other dependents who could work in my
6 absence. I am not alone. At times I could be there to organise
7 them. But I have people there who would work for me on the farm
8 that I have.

9 Q. Did you get any further assistance from the Prosecution
10:26:07 10 while you were in Freetown in order to support your family in
11 January of this year?

12 A. No.

13 Q. When you were in Freetown then did you receive --

14 JUDGE SEBUTINDE: Excuse me, Mr Munyard. I thought the
10:26:32 15 witness's answer was no. I see the record shows yes. I hope
16 that that record will be corrected to reflect the correct answer.

17 MR MUNYARD: It certainly is the opposite of the answer
18 that he gave. I think it will no doubt be corrected by the time
19 of the final version, but I'm sure it could be corrected now
10:26:59 20 because we're still so close to it. Your Honour, do you want me
21 to pause until that's corrected? Would your Honours like me to
22 continue or should we pause until that's corrected? I'm in the
23 Court's hands.

24 PRESIDING JUDGE: Please continue, Mr Munyard. The Court
25 Attendant has gone to deal with it.

26 MR MUNYARD: Certainly:

27 Q. Mr Mansaray, while you're being interviewed in January in
28 Freetown we know that you're also going to the hospital for
29 dental treatment, but during the course of those interviews were

1 you shown any copies of the previous interviews that you'd had,
2 any documents, setting out in writing what you had previously
3 told the Prosecution?

4 A. Yes, they showed me those documents. They read them to me.

10:28:17 5 If there were corrections to be made I would make them.

6 Q. And did they give you copies to keep yourself?

7 A. No, they did not give me any copy.

8 Q. Let's move on them from the end of January. You were
9 interviewed again on 19 and 21 February. I think you're here in

10:28:49 10 The Hague by then. Is that right?

11 A. Yes, when I came here I've been interviewed.

12 Q. And again was what you had previously said that was written
13 down read back to you?

14 A. Yes.

10:29:20 15 Q. You were interviewed on 23 February as well. Can you
16 remember that?

17 A. Well, I remember when I came here I was interviewed, but I
18 cannot recall the exact dates.

19 Q. Well, these are the most recent interviews and they're only
10:29:48 20 a matter of a couple of weeks ago really. How many times do you
21 think you were interviewed since you arrived in The Hague? On
22 how many different dates?

23 A. Well, as I can recall it could be up to four or five times.

24 Q. Now in addition to being accommodated in The Hague have you
10:30:22 25 also been given any money yourself?

26 A. No, since I've been here they've not given me money.

27 Q. You've been here now for at least two weeks, haven't you?

28 A. Yes, it's more than two weeks ago.

29 Q. Were you given any money in Freetown to bring with you to

1 The Hague?

2 A. Yes, they gave me money that it was a travelling allowance.
3 They gave me that money in Freetown, the very day that I was
4 travelling to here.

10:31:16 5 Q. Can you help us with how much that is?

6 A. They gave me 300 United States dollars. That was what they
7 gave me as travelling allowance.

8 Q. And have you had to change that into euros and this time I
9 do mean euros?

10:31:49 10 A. No.

11 Q. So how have you been able to spend any money while you've
12 been in The Hague?

13 A. Since I've been here I've not spent any money and the money
14 they gave to me, I sent that to my family. The very day they
10:32:13 15 gave it to me I sent it to my family even before I travelled
16 here.

17 Q. So whilst you've been in The Hague, in order to move around
18 from one place to another are you entirely dependent on the
19 witness service?

10:32:37 20 A. Yes, because the only place I go, it's only from where I am
21 lodged to here. I can only move from where I am lodged to here.
22 I don't go anywhere else.

23 Q. Now, Mr Mansaray, on the documents that we've been supplied
24 with there is no reference to any money given to you after 10
10:33:22 25 October 2007 when you were given - you were either given or it
26 cost 140,000 leones to buy your cell phone with SIM card. Are
27 you quite sure that you received dental treatment during October
28 of last year while you were in Freetown being interviewed on a
29 number of different dates by the Prosecution?

1 A. Well, they gave me money from the time I started the
2 interview. They were giving me money after I had completed the
3 medical treatment.

4 Q. I want to be quite clear about this. You presumably you
10:34:19 5 remember the last time you had dental treatment. Is that right?

6 A. Yes.

7 Q. When was the last time you had dental treatment?

8 A. January 2008.

9 Q. All right. Well, I'm going to deal with two lots of dental
10:34:52 10 treatment in that case. Where did you have dental treatment in
11 January 2008?

12 A. I cannot recall the date. I can only recall the month and
13 the year which I have already shown to you.

14 Q. Right. And the cost of the dental treatment then was met
10:35:24 15 by the Prosecution, yes?

16 A. Yes.

17 Q. And you're quite sure about that?

18 A. Yes. They provided me with a nurse and the nurse took me
19 to the hospital and that nurse paid.

10:35:51 20 Q. When was the time before that that you had dental
21 treatment?

22 A. It was around November and December 2007.

23 Q. And where were you when you had that dental treatment?

24 A. I was in my home town then I came to Freetown where the
10:36:25 25 treatment was done.

26 Q. And who paid for that treatment?

27 A. The Special Court. The Special Court people paid.

28 Q. Now do you remember when I was asking you about payments
29 made to you in July and August of 2007 I said to you that there

1 is a receipt for 28 July 2007 for 107,000 and a receipt for 15
2 August 2007 for 86,000, both of those it says were paid on 27
3 November 2007. Now is that your medical treatment for your teeth
4 or is that some other medical treatment?

10:37:30 5 A. No, it was not for the teeth. I had - it was for the
6 sickness for which I was treated and for my wife --

7 THE INTERPRETER: Your Honours, can the witness repeat the
8 last bit of his answer.

9 PRESIDING JUDGE: Mr Witness, the interpreter requires you
10:37:53 10 to repeat the last part of your answer. Pick up please where you
11 said that it was for your wife. Continue from there.

12 THE WITNESS: The money that I received for the first
13 dental treatment, that was the treatment for my wife and I when
14 we were sick. I got sick first and I underwent treatment and
10:38:23 15 later my wife got sick. That was the money when I came, they
16 paid that to me.

17 MR MUNYARD:

18 Q. So the dental treatment that you had in October/November
19 2007, that was completely separate from the 193,000 leones that I
10:38:55 20 calculate those two sums come to. Is that correct?

21 A. Yes, it was different.

22 Q. And the money that was paid for the dental treatment is on
23 top of the 193,000, yes?

24 A. Well, for that one the Special Court staff paid the money
10:39:33 25 in the hospital.

26 Q. Yes, I'm just trying to find out did they pay 193,000 for
27 your earlier medical problems and then pay a further sum in
28 October or November for your dental treatment?

29 A. Yes.

1 Q. And I'm not sure if when you answered earlier you were able
2 to give us a rough estimate of what it cost for your dental
3 treatment other than probably more than 70,000. Are you able to
4 do any better than that now you're thinking about it? Can you
10:40:22 5 give us a rough idea of how much the October/November dental
6 treatment would have cost?

7 A. Well, that one, I cannot tell you now because that was paid
8 by the staff of the Special Court.

9 Q. And then can you move on then to January of this year when
10:40:43 10 you had more dental treatment. You've told us you had more
11 dental treatment in Freetown and how much time did you spend
12 having dental treatment in January?

13 A. Well, it was more than a week. I was in Freetown for more
14 than a week.

10:41:11 15 Q. How often did you have to go to the hospital, if it was a
16 hospital, for dental treatment?

17 A. I used to go to the hospital, the Connaught Hospital. It
18 was more than three times. They used to come to my house and
19 then take me to the hospital.

10:41:33 20 Q. Have you any idea how much you would have had to pay for
21 that dental treatment if the Prosecution hadn't paid for it?

22 A. Well, it could be more than 70,000 Leones because to
23 extract it took the prices a bit high, but I don't know exactly
24 the amount paid by Special Court.

10:42:14 25 Q. And again does it follow in January of this year if the
26 Special Court hadn't paid that money for your dental treatment
27 you would not have been able to afford it?

28 A. Well, it would have been difficult for me because - because
29 of the sort of job I was doing, it would have been difficult for

1 me. But for me to have be cured quicker one that's the reason
2 why they assisted me.

3 Q. Well, we understand why they assisted you. All I want to
4 know is --

10:43:04 5 JUDGE SEBUTINDE: What was that he said?

6 MR MUNYARD: For me to have been --

7 JUDGE SEBUTINDE: To have been cured what? It's not
8 recorded. Even the transcriber didn't get the word.

9 MR MUNYARD: Shall we try again, your Honour?

10:43:18 10 THE INTERPRETER: Your Honours, it's for me to have got
11 faster treatment.

12 MR MUNYARD: Yes, I think cured, I think the word that
13 followed was quicker or faster or something like that:

14 Q. But you wouldn't have been able to afford it in January of
10:43:37 15 this year, would you, you yourself?

16 A. Yes.

17 Q. That's one of those answers I think I'm going to have to
18 explore. When you say yes are you agreeing with me that you
19 would not have been able to afford to pay for that treatment
10:43:54 20 yourself in January of this year? Are you agreeing with me?

21 A. Yes, I could not have been able to pay for myself. That's
22 the reason why I requested for their assistance.

23 Q. So, Mr Mansaray, do you agree with me also that because of
24 your connection with the Prosecution an awful lot of bills have
10:44:23 25 been paid for you that you would not otherwise have been able to
26 afford?

27 A. Yes, I wouldn't have been able to pay because I hadn't the
28 opportunity to get set money.

29 Q. Medical bills have been paid for you and your wife, school

1 bills have been paid for your children. That's right, isn't it?

2 A. That was what happened. They assisted me for medical, for
3 my wife and for myself and paid school fees for my children.

4 Q. And do you agree that up to 10 - well, I had better correct
10:45:31 5 that in the light of the dates on this. Up to 27 November 2007
6 you had been paid 2,423,000 leones? Mr Mansaray, I'm not
7 expecting you to have done the mathematics. This is the figure
8 that we've been given by the Prosecution. Do you accept that you
9 had received something around 2,423,000 leones from the Office of
10:46:16 10 the Prosecution up to 27 November last year?

11 A. I did not understand, sir. I want you to repeat.

12 Q. Let me explain where I get the figure from. I have been
13 putting to you sums of money that you've received from the
14 Prosecution and I've been putting those sums of money from a
10:46:38 15 document that the Prosecution have given us telling us what they
16 paid you, when they paid you and what it was for. Do you follow?
17 Do you understand?

18 A. Yes, I am listening.

19 Q. Thank you. They, the Prosecution, have added it up all and
10:47:01 20 the total that they have given is 2,423,000 leones in payments
21 either to you or on your behalf while you've been engaged with
22 them. Now I don't imagine you're going to dispute that figure,
23 are you, because it comes from the Prosecution and it's their
24 addition of the sums that they have paid for you or on your
10:47:33 25 behalf?

26 A. I wouldn't deny it because all those monies you've
27 mentioned that I've answered to, when it was being given to me I
28 did sign for them. So if you take a - if you calculate all that
29 money I believe it is true.

1 Q. Thank you. Now we have to add to that an unknown sum that
2 was either given to you or expended on your behalf in the year
3 2004 when you were interviewed in March of that year, don't we,
4 because that doesn't feature on the document that we've been
10:48:26 5 given. So we have to put more money on to the total, don't we,
6 to cover what you told us you were paid in 2004. Do you agree?

7 A. I've heard you.

8 Q. Well, when you say you've heard me are you agreeing with
9 me? It may simply be my not understanding what you mean by,
10:48:53 10 "I've heard you"?

11 A. Yes, as long as it has to do with money and there is a
12 document to the effect between myself and the Special Court I
13 will agree with you.

14 Q. Now this document stops at 10 October 2007, although on two
10:49:21 15 earlier entries in July and August 2007 it says you were paid
16 medical expenses on 27 November 2007. You've told us that after
17 the last interview on 16 October 2007 you were also paid some
18 money, so that would have to be added on, would it not?

19 A. Yes, I have agreed to what you've said. Whatever money
10:50:00 20 Special Court had given me for which I signed, you are in the
21 place to add it to that. As long as they have their own
22 signature there as well then mine too is there I would agree to
23 it.

24 Q. Yes, we haven't got any documents with or without your
10:50:18 25 signature covering the period after 10 October 2007 except the
26 medical bills. But you've told us that you were given more money
27 then. You've also told us, have you not, that you were paid
28 medical expenses, that is to say dentist's bills, in January of
29 2008 and they don't appear on this document so we would have to

1 add the cost of your dental treatment and any other expenses that
2 were met by the Prosecution in 2008, wouldn't we?

3 A. Yes.

4 Q. So, Mr Mansaray, do you agree with me that you've actually
10:51:24 5 made quite a lot of money as a result of cooperating with the
6 Prosecution in this case?

7 A. Well, I cooperated with the Prosecution but with regards
8 the money, it was utilised for the purpose of my health, it was
9 not a personal benefit I made out of that.

10:51:58 10 Q. It was a benefit in this sense that you didn't have to
11 spend those large amounts of money on medical bills for you and
12 your wife and so you benefitted in that way, didn't you?

13 A. Yes, I will agree with you because without those monies
14 allowing me to undergo medical treatment probably I would have
10:52:33 15 lost my life or my wife's life. For you to say it's a benefit,
16 well, that's good for me.

17 Q. And was it made clear to you the very first time you spoke
18 to the Prosecution that they would be able to meet your medical
19 bills if any arose if you cooperated with them?

10:53:06 20 A. Well, they told me if I incur a medical bill they will
21 assist me, but they will have to check first to ensure it is the
22 truth. So I was not expecting them to pay me on a monthly basis
23 or a weekly basis, but if I fell ill or my wife or my children
24 they assisted me.

10:53:39 25 Q. And apart from providing - does your Honour have a problem
26 with the record of that answer?

27 JUDGE SEBUTINDE: I personally I am having a problem with
28 the interpretation. Maybe it's the accent. I don't know.

29 MR MUNYARD:

1 Q. Mr Mansaray, apart from feeding and clothing your family
2 and putting a roof over their heads the most important
3 expenditure you have to meet is medical bills, isn't it?

4 A. Yes.

10:54:25 5 Q. And you knew from the outset that if you helped the
6 Prosecution they would pay your medical bills if and when any
7 need for medical treatment arose?

8 A. Yes, for that - that too was on my mind because what
9 happened, I was not pleased with it because if it had not been
10:55:01 10 for the peace accord which was disturbed, there was no need for
11 me to go and beg them, I would have been able to do everything
12 for myself.

13 Q. But you've told us that you wouldn't have been able to meet
14 any of those medical bills that we've discussed today and Friday.
10:55:23 15 Do you agree?

16 A. I will agree with you, because we were not expecting the
17 Special Court, but the commanders and the ex-president
18 contributed to that for us to continue begging. So if there is
19 no way for me, rather than going to steal I will prefer to go and
10:55:54 20 beg for assistance.

21 Q. In this instance you didn't need to because of your
22 cooperation with the Prosecution. That's right, isn't it?

23 A. Yes, in the interest of justice I cooperated with the
24 Prosecution because where there is justice there will be peace
10:56:20 25 and then there will be respect for human rights, so I cooperated
26 with the Prosecution to testify to explain to them what I saw.

27 Q. And you also benefitted financially to a very great degree,
28 didn't you?

29 A. Well, it was an assistance I received from them. I didn't

1 put that money into a bank or to do any other thing. It went to
2 assist me for my health and my family.

3 Q. We're not disputing that, but the fact remains it was a
4 very considerable benefit to you, wasn't it?

10:57:15 5 A. It was not a benefit because whenever you needed something
6 you will have to beg. Then sometimes when you are ready for it
7 it will not be forthcoming at the time you needed it. So that
8 was just an assistance.

9 Q. A significant financial assistance, yes?

10:57:47 10 A. Yes, it is important. It was so important. The assistance
11 they gave to me was so important.

12 MR MUNYARD: Thank you, I have no other questions.

13 PRESIDING JUDGE: Thank you, Mr Munyard. Mr Bangura, do
14 you have re-examination of the witness?

10:58:08 15 MR BANGURA: Thank you, your Honours. Yes, I do have some
16 questions for the witness in re-examination.

17 RE-EXAMINATION BY MR BANGURA:

18 Q. Good morning, Mr Witness.

19 A. Yes, good morning.

10:58:21 20 Q. Mr Witness, in answer to questions put to you by counsel
21 for the Defence last week regarding the period you were at Peyama
22 as an IDU agent - do you recall that time?

23 A. Yes.

24 Q. You did say that civilians were captured and they were sent
10:58:57 25 to Kailahun. Is that correct?

26 A. Yes.

27 Q. You also did say that you had women with you who stayed
28 with you at Peyama who were not sent to Kailahun. Is that
29 correct?

1 A. Yes.

2 Q. Now can you clarify for what purpose those women who were
3 not sent to Kailahun were kept for at Peyama at the time?

10:59:43

4 A. Yes, I can make that clarification. Those women that
5 stayed with us in Peyama, they were there as bush wives. Those
6 that we captured who were willing to stay with us, those were the
7 women that stayed with us there. Then there were some of them
8 who agreed to be trained as fighters. They were the sort of
9 women that stayed with us there. But there were those who were
10 captured and there were men who were not prepared to take them up
11 as bush wives, we sent them to Kailahun.

11:00:28

12 Q. Now when you say they were bush wives can you clarify what
13 you mean?

11:01:06

14 A. Yes. Those were the women that had stayed with us for us
15 to have sexual intercourse with them during the time we were in
16 the jungle.

17 Q. Now apart from being used as bush wives did they perform
18 any other role for you the fighters in Peyama?

11:01:36

19 A. Well, apart from having sexual intercourse with them,
20 except doing domestic chores.

21 Q. Thank you. Now also in answering questions to counsel last
22 week you did say that - he suggested to you that there was no
23 point in making a report about your own conduct - you as an IDU
24 agent, there was no point in making report about your own conduct
25 because nothing was being done about those reports. Do you
26 recall?

11:02:06

27 A. I remember, but that was not the way it happened.

28 Q. Do you want to explain how it happened?

29 A. Yes. The work was a Joint Security work. It was not an

1 individual work. So even the fighters had the right to give a
2 report about a bad conduct. Whether the person is a Joint
3 Security personnel or a fighter, the security situation was open
4 at the time I was in Peyama in 1995. Almost all of us were
11:03:18 5 security men but we were in the Joint Security, we were Joint
6 Security officers, but that doesn't mean we were above the law.
7 We were all being guided by the law. So even if it happened that
8 I did something wrong I was liable to be prosecuted. So I was
9 not above the law.

11:03:45 10 Q. Now when it came to some of the wrong things that you did
11 as RUF fighters you did say that your commanders instructed you
12 to survive on what you found on the field. Is that correct? Do
13 you recall that?

14 A. Yes, that was what was in the law, that whatever item that
11:04:24 15 was looted, we were to survive from there. Whether it was
16 clothing, food. So that was what we survived on. From the
17 commanders coming down to the least person, we had survived from
18 looted properties.

19 Q. Do you recall which commanders gave you those instructions?

11:04:52 20 A. For that it was part of the phase 22 standing order. That
21 came directly from the office of the leadership. They said we
22 live on what we capture. So that didn't come from a particular
23 commander, but it was the entire revolution that issued that
24 order.

11:05:26 25 Q. Now when you say that came from the leadership, is your
26 reference to leadership limited to one particular leader of the
27 RUF over the time?

28 A. Yes, at the time we had a leader who was the head of the
29 RUF organisation. Then we had senior commanders who were part of

1 the revolution.

2 Q. When you say a leader, that this order came from a leader,
3 are you referring to one particular leader only?

4 A. Well, at the time we had only a leader that I knew.

11:06:27 5 Q. Was this standing order only practiced during the
6 leadership of one leader only or was it a standard - as you've
7 called it, a standing order that went through other leaders?

8 A. Well, that was the way it happened. It was a continuation.
9 When one leader was replaced and another leader comes in it would
11:07:02 10 be the same. But after the leadership from 1995 to '96, when the
11 other leader took over his own reign was destructive more than
12 the previous one.

13 Q. And when you say the leaders here, can you name the names
14 of the leaders over time that had this policy as a standing
11:07:33 15 order?

16 A. Yes.

17 Q. Please do.

18 A. The first leader I knew from 1991 to 1996 March, that was
19 Corporal Foday Saybana Sankoh. Then later in 1996 March to 28
11:08:12 20 November 1996, Mohamed Tarawali. Then Sam Bockarie 28 November
21 1996 to December 1999.

22 Q. Now on Friday again in answer to questions put to you by
23 counsel for Defence you indicated that in 1991 until '92 - in
24 1991 you went across the border from Sierra Leone into Liberia.

11:08:56 25 Do you recall that evidence?

26 A. Yes.

27 Q. And you indicated the names of the locations that you went
28 to or that you were in during that period. Do you recall?

29 A. I want you to repeat, sir.

1 Q. You named certain locations where you - first you named the
2 town from which you crossed from Sierra Leone across to go into
3 Liberia. Do you recall that?

4 A. Yes.

11:09:41 5 Q. And you also named the place in Liberia where you -
6 immediately where you got to when you went across the border. Do
7 you recall that?

8 A. Yes.

9 Q. And further counsel showed you a map or two maps but those
11:10:06 10 locations were not on those maps that you looked at. Do you
11 recall?

12 A. Yes.

13 Q. In fact your evidence was that you crossed from a place in
14 Sierra Leone called Mano Kpende, is that right?

11:10:27 15 A. Yes.

16 Q. And that you went across at a point in Liberia called York
17 Island. Is that correct?

18 A. Yes.

19 MR BANGURA: Your Honours, at this stage I would ask that
11:10:46 20 the Court Officer show the witness a set of maps that we have
21 provided, three maps, and I would seek the witness to identify
22 those locations on the maps. Please show the witness - the first
23 one would be a Google satellite map of Mano Kpende and the date
24 on that one if you look at the foot of that page is 9 March.

11:11:20 25 There are two maps of that same description, one is dated 9 March
26 and the other is dated the 10th. First show the witness the one
27 dated the 9th:

28 Q. Now, Mr Witness, if you look at the top of that map you
29 could see there's a title there, there's some writing there

1 describing what is contained on the page. Do you see it? Do you
2 see the writing there?

3 A. I see some writing on the map.

4 Q. Can you read that at the top, right at the top?

11:12:14 5 A. On top?

6 Q. Yes, the very first line.

7 A. Yes, I am seeing "Mano Kpende/Sierra Leone Google satellite
8 maps".

9 Q. Now this map shows you the location of Mano Kpende on it.

11:12:39 10 Now if you look at the map itself do you recognise the outline of
11 Sierra Leone, the country Sierra Leone?

12 A. Yes, I am seeing Sierra Leone.

13 Q. If you look south of Sierra Leone almost down to the tip -
14 can the witness be moved to the --

11:13:13 15 MR MUNYARD: Madam President, we don't dispute that this is
16 where Mano Kpende is. The Prosecution has produced this map from
17 Google satellite maps and we're quite content to work on the
18 basis that that's where it is. The witness needn't be put
19 through a long painstaking process. He can just be directed to
11:13:35 20 it.

21 PRESIDING JUDGE: Mr Bangura, counsel for the Defence
22 concedes that this Mano Kpende is as marked on this map.

23 MR BANGURA: In that case, your Honour, I will just ask the
24 witness to indicate that the spot there is Mano Kpende:

11:13:54 25 Q. Witness, there is a big spot there south of Sierra Leone
26 like a watermark, do you see it? Do you see it? There's no name
27 there, just south of Sierra Leone?

28 A. Yes.

29 Q. Do you agree that that is Mano Kpende, the point from which

1 you crossed into Liberia?

2 A. Yes.

3 MR BANGURA: Can the witness be shown the next map, please.
4 That's the same map but in a much zoomed out - not that one.

11:14:53 5 Yes:

6 Q. Mr Witness, do you again see the location of Mano Kpende on
7 the map?

8 MR MUNYARD: He can be led on this point. No one can
9 actually see Mano Kpende on the map because the town name isn't
10 attached to the dot, but I'm quite content for him to be told
11 that dot is on Mano Kpende.

12 PRESIDING JUDGE: Mr Bangura, you have heard counsel for
13 the Defence.

14 MR BANGURA: Thank you, counsel:

11:15:37 15 Q. Mr Witness, the big mark there which you see, do you agree
16 that that is the location of Mano Kpende from which you crossed
17 into to Liberia?

18 A. Well, I am seeing the mark, then if I can see the names of
19 towns on this map I'll be able to see where Mano Kpende is easily
20 on this map.

11:16:09 21 Q. If you look right across on your right, towards the right,
22 you will see a town there called Tiene. Do you recognise that
23 town?

24 A. Yes.

11:16:30 25 Q. Is that the town in Liberia where you said you were when
26 you went across?

27 A. Yes, I was there for more than two months to three months.
28 I was in Tiene. I have seen the spelling on this map.

29 MR BANGURA: Your Honours, the witness recognises Mano

1 Kpende and Tiene on the second of the two Google maps.

2 PRESIDING JUDGE: I'm not convinced he recognised Mano
3 Kpende on the second map, but it's not in dispute.

4 MR BANGURA: All right. And Tiene --

11:17:10 5 PRESIDING JUDGE: Tiene he definitely recognised.

6 JUDGE SEBUTINDE: Mr Bangura, the spelling we had before of
7 Mano Kpende had a G-B spelling with an H at the end.

8 MR BANGURA: Yes, I realise that, your Honour. We had a
9 spelling from the witness which probably reflects the way he
11:17:37 10 pronounced the name. We Googled it but nothing in that spelling
11 came up and for this location. I wonder whether my learned
12 friend on the other side would --

13 MR MUNYARD: I would have absolutely nothing to say on
14 this. We all know that - we've seen from the maps I produced the
11:18:00 15 town of Klay had two completely different spelling depending on
16 which map company you used. I'm not taking any point on this.
17 He can be led on where Mano Kpende is and that's all. I'm happy
18 for him to be led on that.

19 MR BANGURA: Thank you:

11:18:23 20 Q. Mr witness, the map which is shown to you now shows two
21 sides of two different countries. Do you recognise that?

22 A. Yes.

23 Q. There's a big black dotted line running through between two
24 parts of this map. Do you realise that?

11:18:58 25 A. Yes.

26 Q. The area on the left side which has a fewer names on it
27 represents Sierra Leone. Do you agree?

28 A. Yes.

29 MR MUNYARD: None of that is in dispute. There aren't any

1 names apart from some river names on that side. Again I just
2 would like us to speed up, if we can. The witness doesn't have
3 to be asked if he recognises it. We accept that this is a map of
4 part of the border between Sierra Leone and Liberia.

11:19:40 5 PRESIDING JUDGE: It would appear, Mr Bangura, you can lead
6 the witness on the specific places that you wish him to identify.

7 MR BANGURA: Thank you, your Honour:

8 Q. Mr Witness, if you look right down to the tip and almost to
9 the end on the black dotted line which is the boundary line do
10 you recognise the name York Island?

11 A. Yes, I have seen York Island here. This is here.

12 Q. And is that the place in Liberia where you went to when you
13 crossed from Mano Kpende?

14 A. Yes, this is the river, Mano River where we crossed, from
11:20:30 15 Mano Kpende we crossed the river and then we went to York Island.

16 Q. Now if you go up along the boundary line for about a third
17 of the distance and look right across to the right --

18 MR MUNYARD: I'm sorry to interrupt, but it's been pointed
19 out to me that anyone who is watching this on any streaming will
11:20:54 20 be very unlikely to be able to read the words York Island because
21 of the way the map has been magnified on the screen and so to
22 assist anyone outside of this Courtroom who doesn't have a paper
23 copy of the map the words York Island appear almost immediately
24 to the left of the had town named Bofuma in south - in Liberia.

11:21:26 25 They're coming up a bit clearing now but there's been some
26 consternation as to where it was because nobody could see what
27 was on the screen. That's where it is.

28 PRESIDING JUDGE: Thank you for that, Mr Munyard. I hope
29 the public appreciates it.

1 MR BANGURA:

2 Q. I was going to ask you to identify Tiene on the map. Do
3 you see Tiene?

4 A. Yes.

11:21:50 5 Q. Can you point to Tiene?

6 A. Yes, this is Tiene [Indicated].

7 Q. You also did mention that you came across the border at one
8 point from Liberia into Sierra Leone and you came through a point
9 called Bo Waterside. Do you recall that evidence?

11:22:17 10 A. Yes.

11 Q. Are you able to identify Bo Waterside on the map again,
12 please?

13 A. Yes, look at it [Indicated].

14 MR BANGURA: Your Honours, may I respectfully ask that
11:22:41 15 these maps in the order in which they have been introduced be
16 marked for identification.

17 PRESIDING JUDGE: Identification at this point? Please
18 correct me if I'm wrong, Mr Munyard, but they appear not to be in
19 dispute?

11:23:00 20 MR MUNYARD: They're not in dispute. What we don't know
21 from the last map we've looked at is what the dark lines are,
22 whether they are roads or boundaries of counties. But unless my
23 learned friend wants to go into that I don't mind us being in the
24 dark as to what they are. What is not in dispute is that this
11:23:26 25 shows a border area between Sierra Leone and Liberia and it shows
26 the towns of York Island and Bo Waterside and previous maps
27 show --

28 PRESIDING JUDGE: Perhaps Mr Bangura can tender them now
29 and you can reply one by one unless you're conceding the entire

1 lot.

2 MR MUNYARD: Not so much concede as accept.

3 PRESIDING JUDGE: Accept.

4 MR MUNYARD: We accept them, yes, as they are.

11:23:51 5 PRESIDING JUDGE: There's no objection, Mr Bangura.

6 MR BANGURA: In which case then, your Honour, may I move
7 that these documents be tendered as exhibits.

8 PRESIDING JUDGE: The first map dated 9 March 2008 with the
9 heading "Mano Kpende map/ Sierra Leone" will be come Prosecution
11:24:19 10 exhibit P-89. The second map with a similar title but dated 10
11 March 2008, one page, will be become P-90 and the third map which
12 does not have a title but which it is agreed or has been
13 identified by the witness as being part of Sierra Leone and part
14 of Liberia, one page, will be become P-91.

11:24:53 15 [Exhibits P-89 to P-91 admitted]

16 MR BANGURA: I'm grateful, your Honour:

17 Q. Mr Witness, in answering questions this morning about
18 whether you had mentioned before in previous statements the
19 presence of the accused in Bomi Hills you did say that you had in
11:25:17 20 fact mentioned that fact in previous statements, did you not?

21 A. Yes.

22 MR MUNYARD: I put to him it was seeing the accused in Bomi
23 Hills.

24 MR BANGURA: I recall, your Honour, that that was the
11:25:39 25 question but the witness did say that he had mentioned.

26 PRESIDING JUDGE: I can recall him saying he had mentioned
27 it and I think counsel for the Prosecution is entitled to clarify
28 that point.

29 MR MUNYARD: I don't dispute that he'd said he'd mentioned

1 it.

2 MR BANGURA: Your Honours, I would like the witness to be
3 shown one of his previous statements and it is the statement
4 dated 20 November 2003. I believe the Defence have a copy of it
11:26:33 5 but the Court Officer does not have it in the records. I could
6 provide the witness with this copy.

7 PRESIDING JUDGE: Have you a clean copy, Mr Bangura?

8 MR BANGURA: Yes, I do have a clean copy.

9 PRESIDING JUDGE: Very well. Perhaps if it can be given to
11:26:49 10 Madam Court Attendant she can show it to the witness.

11 MR BANGURA: For the benefit of my learned friend, I'm
12 referring to the statement dated 20 November 2003 and I'm at page
13 3 of that statement which is otherwise marked 00004673:

14 Q. Mr Witness, this document before you is part of your
11:27:50 15 statement which you made to the Prosecution on 20 November 2003.
16 Do you recognise it?

17 A. Yes.

18 Q. I want to refer you to lines - reading from line 11 - sorry
19 line 9 of that statement. Are you able to read from that point
11:28:23 20 or shall I read it for you?

21 A. In the 9th? Yes, I can read.

22 Q. Can you read right down to line 19 - sorry, line 20. Line
23 20.

24 PRESIDING JUDGE: I'm just concerned about the time,
11:28:47 25 Mr Bangura. The tape may run out.

26 MR MUNYARD: And the interpretation. Line 9 has come out
27 as, "In the 9th".

28 MR BANGURA: In that event, your Honour, we shall take the
29 morning adjournment and come back.

1 PRESIDING JUDGE: Yes, I think it would be appropriate to
2 adjourn and resume this line of questioning at 12 o'clock.

3 Mr Witness, we are now going to adjourn for the midmorning
4 break. We will resume court again at 12 o'clock. Please adjourn
11:29:21 5 court.

6 [Break taken at 11.30 a.m.]

7 [Upon resuming at 12.00 p.m.]

8 MR MUNYARD: Madam President, I didn't want to interrupt
9 Mr Bangura when he was in his flow earlier, but as we have had
11:59:25 10 the break can I just clarify two separate matters. One is -
11 I don't want to deal with it now, but I just want everybody to
12 know - I have realised I had another document relating to
13 finances which probably explains the gap from 10 October 2007
14 onwards and I can deal with it later, unless my learned friend
11:59:45 15 wants to deal with it in re-examination. I don't think it is
16 particularly controversial. The second is that I have looked up,
17 on the transcript for this morning, the question I asked about
18 Bomi Hills. It is on page 21, line 8 onwards, and the question
19 was, "You don't mention seeing Charles Taylor in Bomi Hills until
12:00:08 20 5 October."

21 PRESIDING JUDGE: Mr Bangura, you have heard Mr Munyard on
22 the question of - two matters, one is the question of some
23 expenses, or payments.

24 MR BANGURA: Yes, your Honour. I don't quite understand
12:00:28 25 what my learned friend wants to do at this stage because he has
26 completed cross-examination.

27 PRESIDING JUDGE: He has completed cross-examination.
28 I think he is possibly suggesting maybe it needs to be put on the
29 record that there were actual proper records.

1 MR BANGURA: Your Honours, we do not - if he wants to
2 tender the material he has got as an exhibit, which would be a
3 way of getting that in, we would not object to that, but
4 otherwise I am not so sure, but we do not have any particular
12:01:04 5 interest in dealing with these matters.

6 PRESIDING JUDGE: I see.

7 MR MUNYARD: Thank you. Shall we resolve it at the end of
8 the re-examination?

9 PRESIDING JUDGE: I think that is appropriate.

12:01:14 10 MR BANGURA: On the second point, your Honour, I still
11 maintain the position that the witness said that he had mentioned
12 this fact in his previous statement and that is the only issue
13 that we want to pursue.

14 PRESIDING JUDGE: [Microphone not activated] I note that he
12:01:33 15 has not actually complied with the directive you gave him in your
16 question, which was to read the record.

17 MR BANGURA: Yes, your Honour, but that was where we left
18 off before the break.

19 PRESIDING JUDGE: Yes, so that really has to be answered.

12:01:47 20 MR BANGURA: I think I had asked him to read. May I go
21 over that again:

22 Q. Mr Witness, I would like you to read from line 15 of the
23 document before you, read 15 to line 20.

24 A. Okay, "At that time" --

12:02:11 25 THE INTERPRETER: Your Honours, can I read because the
26 witness is reading in English?

27 PRESIDING JUDGE: Just pause. Mr Interpreter, the record
28 is in English so he has little choice but to read it, so we will
29 hear him.

1 MR BANGURA: Your Honours, maybe to help the process I can
2 read and get the witness to follow.

3 PRESIDING JUDGE: Very well. Mr Interpreter, counsel will
4 read it and allow you to interpret it to the witness.

12:02:42 5 THE INTERPRETER: Okay, your Honour.

6 MR BANGURA: Just a moment. I do not have the document up
7 on my screen:

8 Q. Mr Witness, in that statement that you made to the
9 Prosecution on 20 November, reading from line 15 on page 3 of
10 that statement this was what was asked and these are your
11 answers:

12 "Q. At that time where did you get your weapons from?

13 A. We got them from Liberia. They were brought to us from
14 Liberia.

12:03:22 15 Q. How did you know that these weapons were coming from
16 Liberia?

17 A. At that time the border with Liberia was opened.
18 Charles Taylor was in control of the whole of that area up
19 to the Mano River bridge and by then he was staying in a
20 place called Bomi Hills in Liberia."

12:03:41 21 Now, Mr Witness, in answer to a question earlier, when you
22 said that you had mentioned that Charles Taylor was in Bomi
23 Hills, is this what you were referring to?

24 MR MUNYARD: Sorry, the question was - and I have it up.
12:04:04 25 We can all do it on the LiveNote alphabetical index on the
26 left-hand side. The question was not "Was he living there?", the
27 question was, "You don't mention seeing Charles Taylor in the
28 Bomi Hills."

29 PRESIDING JUDGE: I agree with counsel, Mr Bangura, that

1 was quite precise about seeing as opposed to the existence of the
2 gentleman in that area, or his control over that area.

3 MR BANGURA: Yes, your Honour, but we can agree that this -
4 our position is that the witness did simply say that he had
12:04:36 5 mentioned to the Prosecution previously in a statement. It may
6 be that he was not answering the question put to him directly by
7 counsel, but the fact that he says he had mentioned the name of
8 the accused in a previous statement is, for us, a matter to be
9 clarified, your Honour.

12:04:56 10 PRESIDING JUDGE: The best you can do, I think, in the
11 circumstances, is refer the witness to this part of his record of
12 interview. The fact that to my mind it doesn't overcome the
13 actual - it does not present evidence that he said seeing. It is
14 not entirely relevant. It just goes to credibility and weight
12:05:21 15 and that is as far as I am prepared to take it.

16 MR BANGURA: I can rephrase the question put to the witness
17 in relation to the question which has been read, certainly not
18 pointing to the fact that he saw, but just the fact that he
19 mentioned:

12:05:35 20 Q. Mr Witness, when you said you had mentioned something about
21 the accused, Charles Taylor, before in a statement to the
22 Prosecution, is this what you meant: The portion of this
23 statement which I have just read to you?

24 A. Yes. At that time, 1991, Charles Taylor was staying in
12:05:59 25 Bomi Hills. It was only in 1992, when we returned to Sierra
26 Leone, that we heard that he had gone to Gbarnga, but at the time
27 that we went there I got the information that he was in Bomi
28 Hills with Foday Sankoh.

29 Q. Were you asked, during this interview, how you came to know

1 that he was in Bomi Hills?

2 A. Yes, they asked me at that time.

3 Q. What was your answer to that question?

4 A. At that time I responded that even his fighters told us
12:06:39 5 that and the time we went, I saw somebody who introduced himself
6 to us and the person said his name was Charles Dankpannah Ghankay
7 Taylor. That was how I knew about his presence in Bomi Hills in
8 1991 with Foday Sankoh.

9 MR MUNYARD: This is a transcript of a tape recorded
12:07:04 10 interview. If my learned friend is putting to the witness, "Were
11 you asked how you knew he was there?", then I insist that he
12 shows us on the transcript where that question was asked. It
13 simply isn't good enough to start throwing out lifelines to the
14 witness, on the basis he was asked a question, when we know this
12:07:27 15 is a typed up account from the tape.

16 MR BANGURA: Your Honours, we do not have any objection to
17 counsel re-examining, going again.

18 PRESIDING JUDGE: I don't understand what you are saying,
19 Mr Bangura.

12:07:43 20 MR BANGURA: I have asked this question to the witness,
21 which counsel - admittedly it is not in the transcript of the
22 interview which was given to the witness at the time, which would
23 amount to something new. If counsel wants to pursue a line of
24 re-cross on this question - that is the point I am saying.

12:08:06 25 JUDGE LUSSICK: Just to clear up my mind, Mr Bangura, are
26 you suggesting that that record of interview is not the complete
27 record of what went on in that interview? Are you saying that
28 there are some questions that have been omitted from the record
29 that has been provided to the Defence?

1 MR BANGURA: Not specifically so, your Honour. Not
2 specifically so, your Honour, but I needed to clear the position
3 of the witness's knowledge of this statement at the time. Your
4 Honours, if this is going to create any difficulty I may then ask
12:08:52 5 that that question be struck out and leave it at the --

6 PRESIDING JUDGE: The question and answer, if any, are on
7 the record.

8 MR BANGURA: Not the entire stretch of that line of
9 questioning, just the last question to which counsel is
12:09:10 10 objecting.

11 PRESIDING JUDGE: [Microphone not activated].

12 MR BANGURA: The question was whether he had been asked
13 about his source of knowledge.

14 PRESIDING JUDGE: I understood him to say that the fighters
12:09:36 15 had told him.

16 MR BANGURA: Yes, that he had been told and when he also
17 went across to Bomi Hills later he did see --

18 PRESIDING JUDGE: The answer is on record. It is on
19 record. You can't withdraw it at this point. Continue with your
12:09:54 20 re-examination.

21 MR BANGURA: That was all I was going to ask the witness,
22 your Honour.

23 PRESIDING JUDGE: Thank you, Mr Bangura.

24 MR BANGURA: Thank you.

12:10:11 25 PRESIDING JUDGE: Mr Witness, that is the end of your
26 evidence. We thank you for coming here and giving your evidence
27 over the last few days and wish you a safe journey home.

28 MR MUNYARD: Madam President, before the witness actually
29 goes, it may not need to detain him, but I realise that I had in

1 my papers a document from the Witnesses and Victims Service that
2 deals with expenditure since 3 October 2007 and it probably is
3 right that I put it to the witness because it is a formal
4 document and I was saying that we have no information beyond the
12:10:54 5 date that I gave in October 2007. In fact, that was from the
6 Prosecution documents. This is a Witnesses and Victims Service
7 document and maybe I can just put it to him in the round.

8 PRESIDING JUDGE: I will just ask Mr Bangura if he has any
9 objection.

12:11:12 10 MR MUNYARD: Certainly. I am happy for Mr Bangura to do
11 it, if he wishes, as part of re-examination.

12 PRESIDING JUDGE: This is a document you didn't object to,
13 is that correct?

14 MR BANGURA: Yes, I indicated that earlier.

12:11:22 15 PRESIDING JUDGE: Although it is unusual to re-open a
16 cross-examination, in fairness to the witness I think in this
17 situation it is fair to allow this document to be put to him.

18 MR MUNYARD: Thank you. I also didn't want the suggestion
19 left hanging that the Prosecution hadn't supplied us with
12:11:39 20 information.

21 PRESIDING JUDGE: Indeed, in fairness to the Prosecution as
22 well.

23 FURTHER CROSS-EXAMINATION BY MR MUNYARD:

24 Q. Mr Mansaray, one final question, please. I was asking you
12:11:47 25 questions earlier about the money that had either been given to
26 you, or spent on your behalf, by the Prosecution. We do have a
27 document from a different part of the Court, the Witnesses and
28 Victims Service, which shows that from 3 October last year to 27
29 February this year you were paid medical expenses of 41,000, that

1 is leones, transportation costs of 290,000 and other expenses of
2 431,000. I am really only concerned with the medical costs.
3 Does the 41,000 sound to you as though that is the money paid for
4 your later dental treatment?

12:12:47 5 A. It could be so. Just as I told you, I don't know how much
6 they paid. The staff went and paid the money.

7 Q. Thank you, Madam President.

8 PRESIDING JUDGE: Thank you, Mr Munyard. I may release the
9 witness, or is there a question arising, Mr Bangura?

12:13:07 10 MR BANGURA: No, your Honour.

11 PRESIDING JUDGE: Mr Witness, as I said, we thank you for
12 your evidence here in court over the last few days and you will
13 now be assisted to leave the Court. Thank you.

14 THE WITNESS: Thank you.

12:14:25 15 PRESIDING JUDGE: Your next witness? Mr Koumjian, you are
16 leading the next witness, are you?

17 MR KOUMJIAN: Yes and just to clarify, your Honour, as to
18 which that was, because your Honours ruled that 399 would begin
19 Wednesday unless lead counsel was available earlier and we have
12:14:44 20 not heard the update on that.

21 PRESIDING JUDGE: I do recall, Mr Munyard, I was waiting
22 for you. You had hoped to get us some more information over the
23 weekend. You indicated an expert was finishing on Friday
24 afternoon in the retrial.

12:14:58 25 MR MUNYARD: No, an expert was in the witness box on Friday
26 afternoon. When I spoke to Mr Griffiths on Friday evening he
27 said it still wasn't clear whether he would finish with that
28 witness today or tomorrow and he would give me an update today.
29 Obviously that is not very helpful now because the English court

1 will only have sat at the very moment at which we started our
2 morning break, so the best I can help you with, at this stage, is
3 - I am about to say 2 o'clock. Yes, 1 o'clock English time that
4 court will rise, 2 o'clock our time. We have to allow a bit of
12:15:42 5 time for people to get out of court, so I would think by the time
6 we resume this afternoon I will then know from Mr Griffiths what
7 the likelihood is of him being available tomorrow. He did say on
8 Friday evening he thought it was not particularly likely that he
9 would have definitely finished the expert by the end of today.
12:16:05 10 He thought it was more likely that he would finish him on
11 Tuesday.

12 The difficulty with this particular case that he is in is
13 it is a cutthroat defence meaning - it is a common English
14 expression in legal terms, meaning there is a number of different
12:16:21 15 defendants each blaming one another and therefore you have to
16 listen to the cross-examination of the Prosecution witnesses by
17 co-defending counsel, as much as you conduct it yourself, to see
18 what position they are taking before you then get up to
19 cross-examine. Depending on what position they are taking, there
12:16:41 20 may be a little or a lot of cross-examination that Mr Griffiths
21 has to do. That was why he was not able to be particularly
22 precise on Friday, because he has not yet finished hearing the
23 line that the other Defence counsel are taking in their
24 cross-examination of that witness.

12:16:59 25 So the best I can do is update the Court at 2.30, but at
26 the moment we anticipate another witness starting now and then
27 who knows what, assume we start on Wednesday with 399, then
28 I don't quite know where that leaves us, but we are in the
29 Court's hands.

1 PRESIDING JUDGE: Mr Koumjian?

12:17:40 2 MR KOUMJIAN: Your Honour, perhaps we can deal with 399
3 later, but I would just inform the Court that it is our belief,
4 after speaking to the witness this weekend, that if he does not
5 finish this week it will be - 399 does not, it will not be
6 possible to bring him back, so we can deal with that when the
7 other court releases lead counsel apparently, but at this point
8 we are prepared with 532 and I do not anticipate, unfortunately,
9 we will finish his evidence this week if interrupted, so it is a
12:18:01 10 very unfortunate situation.

11 PRESIDING JUDGE: And --

12 MR KOUMJIAN: 532.

13 PRESIDING JUDGE: Thank you. What language will the
14 witness speak?

12:18:13 15 MR KOUMJIAN: Your Honour, the witness will speak in
16 Liberian English and, anticipating your next question about
17 protective measures, this witness was one of the witnesses that
18 the Prosecution requested protective measures for several months
19 ago, but the witness had indicated to us here that if a situation
12:18:36 20 was changed regarding family members, his concern was for the
21 security of family members, that he would be willing to testify
22 openly. That concern has been addressed, the witness does feel
23 that the family is now secure and the witness informed us that he
24 would testify in open, so there are no protective measures.

12:18:56 25 Excuse me, the witness is testifying in Krio, I gave the wrong
26 language.

27 PRESIDING JUDGE: I note what you have said about the
28 protective measures, et cetera, and I will just check on the
29 interpreters. Mr Interpreter, is there a Krio interpreter in

1 place?

2 THE INTERPRETER: Yes, your Honour.

3 THE INTERPRETER: My Lord, there is a Krio interpreter in
4 place.

12:19:18 5 PRESIDING JUDGE: Very good. Please call the witness.

6 MR KOUMJIAN: Your Honours, excuse us, we will have to do a
7 little dance ourselves, but the Prosecution calls witness 532,
8 Isaac Mongor.

9 WITNESS: TF1-532 [Sworn]

12:20:37 10 PRESIDING JUDGE: Please proceed, Mr Koumjian.

11 EXAMINATION-IN-CHIEF BY MR KOUMJIAN:

12 Q. Good morning, sir. Would you please tell the Court what
13 your name is?

14 A. I am Mr Isaac Tamba Mongor.

12:21:06 15 Q. Can you spell Mongor, please?

16 A. M-O-N-G-O-R.

17 Q. Sir, where were you born?

18 A. I was born in Sierra Leone.

19 Q. Where in Sierra Leone?

12:21:35 20 A. I was born in Kailahun District in a town, or a village,
21 called Kangama.

22 Q. What were the nationalities of your father and mother?

23 A. My father is a Kissi and my mother is a Bassa from Liberia.

24 Q. Mr Witness, when were you born?

12:22:11 25 A. I was born in 1965, 24 November.

26 Q. Where did you grow up?

27 A. I grew up in Liberia.

28 Q. What languages did you learn growing up?

29 A. Well, I speak my mother's language and I also speak the

1 Liberian English. I also speak Krio.

2 Q. Sir, did you ever perform any military service?

3 A. Yes, I had been in the national army in Liberia before.

4 Q. When did you first join the Liberian national army?

12:23:24 5 A. I joined it at the time when Doe was president. That was
6 the time I joined it.

7 Q. Do you recall what year it was when you joined the Liberian
8 army?

9 A. I can recall that it was in 1985.

12:23:48 10 Q. Were you trained after joining the Liberian army?

11 A. Yes, but I didn't complete the training and I left there.

12 Q. For about how long were you a member of the Liberian army
13 before you left?

14 A. Well, I didn't stay at the training base for too long when
12:24:19 15 I ran away and left there because I never wanted the soldier job.

16 Q. Can you give us an estimate of how many weeks or months you
17 were in the army?

18 A. I can say that I spent about two or three months when
19 I escaped.

12:24:45 20 Q. When you left the army where did you go?

21 A. Well, I started doing business.

22 Q. Where was that?

23 A. I used to go to Ivory Coast and buy goods that I used to
24 sell in Liberia and I also used to go to Koindu, in Sierra Leone,
12:25:16 25 where I used to buy goods and then bring them to Liberia for sale
26 as well.

27 Q. Sir, did you continue in that job for some time?

28 A. Yes, I worked on that for some time, until such a time when
29 the war met us.

1 Q. When you say the war met you, can you explain what you
2 mean?

3 A. Yes, it was at one time when I went to buy. It was in a
4 Christmas month when I went to buy goods. When I came to Nimba,
12:26:15 5 that was the time the rebels entered and at that time they called
6 themselves freedom fighters. They entered Nimba whilst I was in
7 one village where I was captured.

8 Q. Sir, you said it was Christmas month. Do you recall the
9 year?

12:26:37 10 A. It was in 1989.

11 Q. The people that you said were rebels that called themselves
12 freedom fighters, did they indicate a name for their
13 organisation?

14 A. Well, they said they were NPFL.

12:27:05 15 Q. What happened when these fighters entered the village you
16 were in in Nimba County?

17 A. Well, when they entered there they shot guns and then
18 they - some people ran away and then, in fact, I was a stranger
19 in the place so I also had to join people and then I entered
12:27:31 20 their house. So, from there, when they ceased fire, they called
21 that we should all come outside and then we all came outside, and
22 then we all came and then they took us, the young men and the
23 young women who were amongst the people, and then they took us
24 along with them. They took us to their base where they were and
12:27:59 25 the place was called Gborplay. That was the place where they
26 took us to.

27 Q. Mr Witness, do you recall the name of the village that you
28 were in when you were captured?

29 A. I am unable to know the village name.

1 Q. You indicated that the fighters entered and they were
2 shooting guns. Were there any Liberian army forces inside that
3 village when the rebels came?

4 A. The Liberian army was not there at all. They were not
12:28:41 5 there.

6 Q. Were there any fighters in that village when the rebels
7 came in?

8 A. Inside the village there were no fighters. I didn't see
9 anybody in that village that had a gun.

12:29:02 10 Q. You indicated that the rebels took everyone from the
11 houses. Where did they take them to?

12 A. Well, they took us to - they handpicked some of us. They
13 did not take everybody along because there were old men and old
14 women. They did not take everybody along, but for us, the young
12:29:29 15 men and women who were there in the town, they handpicked us and
16 took us along.

17 Q. When you say young men and women, can you give us a range
18 of ages of the people that were selected by the rebels to go
19 along with them?

12:29:45 20 A. We had some other people like children who were about 12
21 years of age and some women. There were also small girls that
22 they selected and took us all along.

23 Q. You said that you were taken, I believe, to a training base
24 at Gborplay; is that correct?

12:30:18 25 A. Yes, that was where they took us to go and train.

26 Q. Approximately how many of you --

27 JUDGE SEBUTINDE: Mr Koumjian, is that the correct spelling
28 as it appears on the transcript?

29 MR KOUMJIAN: That is not the spelling I have. The

1 spelling that I have has a "G" in front. It is G-B-O-R-P-L-A-Y,
2 but I believe I have seen both spellings.

3 MR MUNYARD: We have seen that other spelling but in
4 relation to a person, at a much earlier stage in the trial. In
12:31:00 5 other words, a family name.

6 THE WITNESS: Yes, it is a family name.

7 JUDGE SEBUTINDE: What is the spelling then since we have
8 variations?

9 THE WITNESS: The spelling is M-O-N-G-O-R.

12:31:23 10 MR KOUMJIAN: The witness is spelling his name. The
11 question is the spelling of Gborplay and, your Honours, it is on
12 our record G-B-O-R-P-L-A-Y:

13 Q. Sir, can you describe what was going on at this camp at
14 Gborplay?

12:31:55 15 A. Well, it was a place that was a training base. It was a
16 place where they used to train people that they took to. So,
17 when they took us along, they also took us there for us to be
18 trained for us to fight for our country.

19 Q. Who was training you?

12:32:22 20 JUDGE SEBUTINDE: Mr Koumjian, what does he mean by "our
21 country"?

22 MR KOUMJIAN:

23 Q. Sir, did the trainers indicate what country you were
24 fighting for?

12:32:39 25 A. Yes, they said it was Liberia. It was in Liberia that we
26 were to fight. The trainers who were there, they were many, the
27 ones who used to train us.

28 Q. Did they indicate who their leader was?

29 A. Yes, they told us that it was Mr Taylor. They used to call

1 him CIC and I was there when he himself came to the base there,
2 when I saw him, when I saw him and he himself introduced himself
3 to us.

4 Q. Do you know what CIC stood for?

12:33:26 5 A. CIC means he was the commander in chief.

6 Q. How long were you trained at Gborplay?

7 A. I was there for two months when we were graduated from the
8 base.

9 Q. Can you tell us what types of training you received?

12:34:03 10 A. They gave us guerilla movement training and they taught us
11 how to fire guns also.

12 Q. During the training what were the ages of those that were
13 undergoing training with you?

14 A. Well, we never had equal ages. We had some other small
12:34:38 15 boys who were there and there were some other small girls that
16 were there too, and for those of us who were grown up adults, we
17 were there and there were some other people also who were older
18 than us at the base.

19 Q. What was the youngest ages of the boys and girls being
12:35:05 20 trained?

21 A. Well, there were people who were about 10 years.

22 Q. When you finished your training was there any ceremony?

23 A. Well, no ceremony was performed, but they just graduated us
24 and said we have completed the training, so we were put on
12:35:48 25 standby.

26 Q. Where were you assigned after training?

27 A. They assigned me to go and fight on the war front.

28 Q. Can you tell us what fronts you fought on?

29 A. I fought in that same Nimba County at a place called Ganta.

1 I fought there.

2 Q. Anywhere else?

3 A. When I fought there for some time, the CIC came there and
4 established his base at the place and that for us to advance to
12:36:45 5 go to another target where we should also go and fight, and then
6 we were able to go and fight at the next target and that was
7 Gbarnga. That was where we moved again.

8 Q. Sir, when you say "the CIC came there", you were talking
9 before about fighting at Ganta, do you mean the CIC came to
12:37:12 10 Ganta? Do I understand you correctly?

11 A. Well, when we had fought at Ganta and captured the place,
12 the CIC, who was Mr Taylor, came there for him to stay there
13 before we could advance.

14 Q. Then where did you go?

12:37:38 15 A. We went to the next target, which was Gbarnga, because at
16 that time Prince Johnson had captured Gbarnga so we were
17 fighting. We fought from the evening, up to midnight, until in
18 the next morning before we were able to flush Prince Johnson out
19 of Gbarnga.

12:38:05 20 Q. Mr Witness, were you in a particular unit? Did your unit
21 have some name, or designation?

22 A. Yes. At the time we captured Gbarnga they took me to join
23 the Executive Mansion Guard and that was the CIC's bodyguard
24 group. It was that unit that I joined.

12:38:45 25 Q. When you were a member of the Executive Mansion Guard, who
26 was your superior?

27 A. The overall boss - our overall boss, who was in the
28 Executive Mansion Guard, was Cassius Jacobs. He was the boss for
29 us.

1 Q. You said you were captured in 1989, at the end of the year.
2 Can you tell us when was it that you were assigned to the
3 Executive Mansion Guard? What year was it?

12:39:42 4 A. Well, at the time we fought, up to the time we captured
5 Bong Mines, or Ganta that I have spoken about, and when we came
6 to Gbarnga it was the time that I was chosen to serve in the
7 Executive Mansion Guard, but at that time the Christmas month in
8 which I was captured had gone, but I cannot exactly tell you the
9 month now.

12:39:59 10 Q. Just to be clear, when you say "Christmas month" you mean
11 December?

12 A. Yes, it is December that I am talking about. That was the
13 time that I became a member of the NPFL.

14 Q. Can you tell us when you were made a member of the
12:40:21 15 Executive Mansion Guard? Was it in the next year, or was it
16 after the next year? You said you were captured in December
17 1989. Do you know the year you were made a member of the
18 Executive Mansion Guard?

19 A. Well, it was the next year because that December had gone
12:40:46 20 and we had entered the next year and that was the time I entered
21 that group.

22 Q. Can you tell us the duties of the Executive Mansion Guard?

23 A. Those of us who were Executive Mansion Guards at that time,
24 we used to guard the CIC, which was Mr Taylor, and we used to go
12:41:19 25 to the front line. We also fought there and at any time the CIC
26 was going somewhere, we used to go with him. When I was there
27 myself, I was one of the persons who used to operate the heavy
28 weapons and I was the advance team commander. At any time the
29 CIC used to move, I was always in the front. I used to move

1 first before the whole group followed me.

2 Q. Did you have a rank at that time?

3 A. At that time I was a sergeant when I was using the AA one
4 barrel and I was the advance team commander when I was always on
12:42:27 5 the front line. When the CIC was going to a front line, I was
6 the front line commander at that time.

7 PRESIDING JUDGE: Mr Koumjian, for the purposes of record
8 we should have a definition of an AA.

9 MR KOUMJIAN:

12:42:42 10 Q. Can you explain what an AA gun is?

11 A. An AA gun is an anti-aircraft.

12 Q. Sir, when you were with the Executive Mansion Guard, how
13 often would you see the commander in chief, the person you said
14 was Mr Taylor?

12:43:13 15 A. Well, I used to see him every day because those of us who
16 were Executive Mansion Guards, we had access to him and we were
17 the ones who escorted him. We were also the ones at any time we
18 went to the front line, if he never went with us we will explain
19 to him what was happening on the front lines. So I can say
12:43:44 20 I used to see him always.

21 Q. At the Executive Mansion was there a routine? Was there
22 something that happened normally every day?

23 A. We used to have a morning parade on the ground there. We
24 always used to have a parade on the ground, when the Pa himself
12:44:11 25 will come to inspect the troops.

26 Q. Mr Witness, when you say "the Pa himself", who do you mean?

27 A. It is the CIC, Mr Taylor.

28 Q. Who would come out to the parade ground for this
29 inspection?

1 A. Well, the CIC himself would come to do the inspection, to
2 see the men.

3 Q. What men would be out there? What units would be out at
4 the parade ground?

12:44:53 5 A. Well, at the parade ground we had SBU units. We had some
6 other units also that were there, like the artillery units, to
7 which I was a member and those were the ones who used the heavy
8 weapons. They were also there.

9 Q. You mentioned SBU unit. What did SBU stand for?

12:45:27 10 A. Those were small boys. That was their own unit.

11 Q. What was the age range of the boys in the Small Boys Unit?

12 A. Well, like I have told you before, they had 10 years, some
13 were 12 years. They were small boys. That was the age group of
14 the boys and that was their own unit.

12:46:03 15 Q. Did the Small Boys Unit have any particular jobs in the
16 Executive Mansion?

17 A. They were also among the guards and they also used to go to
18 the front line to fight.

19 Q. How was the security for the commander in chief, for

12:46:37 20 Mr Taylor, arranged?

21 A. Well, sometimes when he was about to go to somewhere he
22 used to disguise himself. He never wanted people to know.

23 Sometimes he could be amongst the SBU units, he would be within
24 their own convoy, and sometimes when he passed through an area

12:47:14 25 people would not be able to understand that he has passed through
26 there. I, who was the head of the advance team, I have told you
27 I used to use the AA. I would always be in front.

28 Q. Mr Witness, when you say that he would disguise himself
29 amongst the SBU units, can you clarify who "he" is?

1 A. It was the CIC, who is Mr Taylor. That is the person I am
2 talking about.

3 Q. Sir, Mr Witness, was Mr Taylor considered by the troops a
4 military leader, or a political leader?

12:48:15 5 MR MUNYARD: Which troops? We are starting to venture into
6 the same territory as we were last week with a different witness,
7 where large numbers of people, who may have disparate views, are
8 being asked about through the medium of one witness who so far
9 hasn't said anything at all to justify giving any kind of answer
12:48:39 10 to that sweeping question.

11 PRESIDING JUDGE: Mr Koumjian, you heard the objection.

12 MR KOUMJIAN: I will ask a different question, your Honour:

13 Q. Sir, did you yourself receive any information about whether
14 Mr Taylor had any military training?

12:49:02 15 A. What I know and what I heard was that they said Mr Taylor
16 was a soldier, somebody who had been in the military, and that
17 the group that he has brought to fight, he was the head of the
18 group, and he owned all the fighters and that he was the
19 commander for the fighters.

12:49:33 20 Q. Mr Witness, did you yourself ever witness Mr Taylor giving
21 military commands?

22 A. Yes, he used to give military commands wherein he will tell
23 people to go to the front line to fight.

24 Q. When you were a member of the Executive Mansion Guard did
12:50:13 25 you observe how the forces of the NPFL were supplied with
26 ammunition?

27 A. The ammunitions that they supplied us on the ground where
28 the CIC was, that is the Executive Mansion Ground, that was where
29 the ammunition were and it was Mr Taylor - at any time he was

1 ready to move to the front line, the ammunition will be in the
2 vehicle that was at the rear following him, that was going
3 together with him, because at the time we were fighting to go to
4 the city, when we captured Coca-Cola factory, that was where he
12:51:12 5 established his base, so that was where he used to bring the
6 ammunition and where he would keep them, and that was where he
7 used to take them and give them to us, the fighters, to go and
8 fight.

9 Q. Mr Witness, where is the Coca-Cola factory you are speaking
12:51:34 10 of?

11 A. The Coca-Cola factory that I am talking about is in the
12 city, that is Monrovia. That is where the Coca-Cola factory is.

13 Q. During the times that you were a member of the Executive
14 Mansion Guard, where was the Executive Mansion? Was it in one
12:51:53 15 place, or more than one place?

16 A. Well, they are at different locations, but the main
17 location was Gbarnga and that was the main place. We had some
18 other sub-bases like Bong Mines and from Bong Mines we went to
19 Harbel, which is around the Firestone area. That was where we
12:52:36 20 were, but Gbarnga was the main base for the CIC, who is
21 Mr Taylor.

22 Q. Was there any place --

23 JUDGE SEBUTINDE: Mr Koumjian, could we please have the
24 spelling of that location near Firestone?

12:52:54 25 MR KOUMJIAN: Harbel, H-A-R-B-E-L. Thank you, your Honour:

26 Q. Sir, at Gbarnga was there any particular location where
27 ammunition was kept?

28 A. Well, I can't recall about another location. It was
29 Gbarnga where he kept the ammunition at the Executive Ground.

1 Q. Thank you. That is what I am asking you. Where in the
2 Executive Ground was the ammunition kept? Can you describe the
3 place?

4 A. Well, when I said the Executive Ground, that was where
12:53:51 5 Mr Taylor himself was and that was where they kept the
6 ammunition.

7 Q. In order for a commander to obtain ammunition from that
8 location, did he need the permission of anyone?

9 A. You would always have to ensure that the Pa, who was
12:54:21 10 Mr Taylor, approved for the ammunitions to come out of that place
11 before they came out. If you didn't obtain his approval, no
12 ammunition would come out of that place to go anywhere.

13 Q. The place where the ammunition was kept, was it locked in
14 any way?

12:54:50 15 A. Yes, it was locked and there was somebody who was there to
16 ensure that when the Pa needed ammunition he will come and open
17 and the person was called one Mr Moses Duoh, and he was also one
18 of the Special Forces.

19 Q. So when you say the Pa will come, that "when the Pa needed
12:55:20 20 ammunition he will come", who will come?

21 A. Well, it is Mr Taylor who will come and he will come to
22 deliver the ammunition. The fighters who were on the front line,
23 when they requested for ammunition, Mr Taylor, who was the CIC,
24 will have to approve for this ammunition to be taken out before
12:55:46 25 they will take them out for them to be sent to the front line.

26 PRESIDING JUDGE: Mr Koumjian, the spelling of the name of
27 Moses Duoh I think I heard the witness say.

28 MR KOUMJIAN: D-U-O-H.

29 PRESIDING JUDGE: Thank you.

1 MR KOUMJIAN:

2 Q. Sir, you talked about the Small Boys Unit. I just want to
3 ask you: While you were a member of the Executive Mansion Guard,
4 do you recall the names, by any chance, of any of the young
12:56:27 5 members of the Small Boys Unit?

6 A. Well, we had like Mosquito who was Christopher Varmoh. We
7 had Zebun who was an SBU commander.

8 MR KOUMJIAN: Your Honours, Christopher Varmoh, the last
9 name is V-A-R-M-O-H and Zebun is Z-E-B-U-N:

12:57:17 10 Q. At some time, Mr Witness, did you get a new assignment?

11 A. Yes. There came a time when I had a new assignment, but
12 before I had the new assignment I was fighting on the front line
13 and when I came from there before I was given that new
14 assignment.

12:57:52 15 Q. Okay, I am not sure - I asked you earlier, but perhaps it
16 was not complete. Can you name the locations where you fought at
17 the front line before you took this new assignment?

18 A. Well, the places where I fought, I fought at Bong Mines and
19 I fought to go towards Monrovia up to Coca-Cola factory and up to
12:58:34 20 the time we entered the capital city, which is Monrovia.

21 Q. Just to clarify that, were you able to take Monrovia at
22 that time when you were with the NPFL?

23 A. Well, we didn't capture the whole Monrovia, but we captured
24 some areas because we were at the City Hall. That was where our
12:59:05 25 defensive was. We were very close going towards the mansion.

26 That was where we were and where we were, you could stand there
27 and see the Mansion Ground.

28 Q. Mr Witness, you mentioned earlier that at Gbarnga you
29 fought against Prince Johnson forces. Did you fight against any

1 other forces in Liberia?

2 A. I fought against Prince Johnson's group and the AFL.

3 Q. Sir, you mentioned Bong Mines, you mentioned Monrovia and
4 Gbarnga, were there any other locations where you fought at the
12:59:58 5 front line that you recall right now?

6 A. Well, those are the places that I can recall for now.

7 I fought at Kakata, of course, because you will have to move from
8 Kakata before you go to Gbarnga. You will have to leave Kakata
9 before you go to Bong Mines and then from Bong Mines before you
13:00:33 10 go to Monrovia, but troops were already at Harbel area, around
11 Firestone, and they had already been fighting there and people
12 were there who were fighting. I went to Schefflin, which was one
13 of the military bases for the AFL, and at that time it was the Pa
14 himself, Mr Taylor, he himself was amongst the attacking force
13:01:19 15 when we went to fight at Schefflin, which was one of the AFL
16 barracks. At that time we were unable to capture there. It was
17 later that we were able to capture there, so I fought in that
18 area.

19 Q. Mr Witness, I just want to clarify the pronunciation that
13:01:52 20 we are getting on the interpretation of the barracks. Is that
21 Schefflin barracks?

22 A. Yes, it was Schefflin barracks. That is what I am talking
23 about.

24 MR KOU MJIAN: I believe the Court has the spelling of
13:02:11 25 Schefflin barracks, but I don't see it spelt on the screen. It
26 is S-C-H-E-F-F-L-I-N. If I am wrong, my colleagues will correct
27 me:

28 Q. The new assignment that you had, Mr Witness, what was that?
29 Tell us about it.

1 A. Well, the new assignment that I had was to go and train
2 people who were to go and fight in Sierra Leone.

3 Q. Mr Witness, when was it? Do you recall the year it was
4 that you were given this new assignment?

13:03:22 5 A. It was in 1990. That was the time I was given the
6 assignment to go and train those people.

7 Q. If you can, can you give us any idea where in the year 1990
8 it was? Do you recall the month, or the approximate time of
9 year?

13:03:46 10 A. It was in - I can say it was in March, or April. I cannot
11 say exactly, but it could be within that period. That was the
12 time I had that assignment.

13 Q. Mr Witness, tell us how was it that you first learned about
14 this assignment?

13:04:35 15 A. Well, I was one of the Executive Mansion Guards, I have
16 told you that, and I was able to get this assignment from the CIC
17 to help his friend, who was Pa Morlai, who was called Foday
18 Sankoh, but at that time we were in Liberia we never knew that
19 Foday Sankoh name. The name we used to call him was Pa Morlai,
13:05:25 20 so he called me - the Pa called me, the CIC, who is Mr Taylor, he
21 called me, together with Foday Sankoh, who was Pa Morlai, when he
22 told me that I should go with that of his brother to help him
23 train his people.

24 I want you to know that at the time we were fighting in
13:06:04 25 Liberia, Mr Taylor used to talk over the BBC and at that time he
26 did say to the Sierra Leonean people that one day they will
27 experience the bitterness of war, because at that time we were
28 fighting, the Alpha Jets used to fly over from Sierra Leone and
29 then bombard in Liberia. So, the CIC, who was Mr Taylor, passed

1 an order that we should arrest the Sierra Leoneans and the
2 Nigerians, so those Nigerians and Sierra Leoneans who were in
3 Liberia, most of them were arrested and put in jail and they even
4 killed some other people. So, he called me to go and train
13:07:16 5 people who will go and fight in Sierra Leone, so he handed me
6 over to his friend, that is Pa Morlai, for me to go and assist
7 train his people.

8 MR KOUJIAN: Your Honours, Morlai I see is spelt
9 correctly, at least the second time it appears and subsequently
13:07:42 10 on the transcript, M-O-R-L-A-I:

11 Q. Mr Witness, when you say that the commander in chief,
12 Mr Taylor, gave you this assignment, was that face to face in
13 person, or how was the message given to you?

14 A. Well, this business of the assignment, it was when Foday
13:08:15 15 Sankoh, who is the same time Pa Morlai, they had already started
16 discussing, the two of them, before they invited me to go there.
17 But what I know was that it was Mr Taylor who told me to go with
18 his brother, who was Pa Morlai, for me to assist him train his
19 people. He was the one who told me.

13:08:44 20 Q. Where exactly were you when Mr Taylor told you to go train
21 Foday Sankoh's people?

22 A. I was on the ground where Taylor was, that is his Executive
23 Ground, that is Gbarnga. That was where I was when he handed me
24 over to Foday Sankoh for me to go and train his people.

13:09:18 25 Q. Who was present at that time?

26 A. I have told you that when they called me I went and I met
27 himself and Foday Sankoh sitting together before he told me that.

28 Q. Thank you. Was this the first time you saw Foday Sankoh?

29 A. No, I used to see Foday Sankoh. I knew him. I used to see

1 him, but I never knew he was a rebel leader, but I only knew that
2 he was a member of the Special Forces and he himself was with
3 Mr Taylor and they were the bosses that we used to guard.

13:10:16 4 Q. After Mr Taylor turned you over to Foday Sankoh, where
5 exactly did you go to do this training?

6 A. I went through the training at Camp Naama and that was the
7 AFL military base. That was the area and we had already been in
8 control of that area, so that was the area where they sent me to
9 train the people because that was where Mr Taylor had given to
13:10:58 10 Foday Sankoh for his men to be trained there.

11 Q. What county is Camp Naama in?

12 A. Camp Naama is in Bong County.

13 Q. Can you describe the camp? What does it look like?

14 A. Well, the camp was a military camp and it is a big place.
13:11:39 15 They have a field there for the training. They had houses there
16 where people live and even the NPFL used to train there. They
17 also had their own base there where they used to train and those
18 were people who were trained heavy weapons. That was where they
19 trained them.

13:12:07 20 Q. Who were the people that you were training there?

21 A. Well, I was training people there who were Sierra Leoneans
22 and I have already told you that Mr Taylor had passed an order
23 that they should arrest Sierra Leoneans and Nigerians, and who
24 had already been jailed. So, at the time, when the issue of the
13:12:40 25 training came up, those Sierra Leoneans who were already in jail,
26 we used to go to their cells and then take them to the base. We
27 will take them from there to the base. So, Mr Taylor had given
28 us one Toyota truck that was what we used to transport the
29 recruits to the base.

1 Q. Okay. I want to regress a moment. I am sorry, Mr Witness,
2 but your answer reminded me of a question I should have asked you
3 earlier. When you said you were captured by the NPFL forces in
4 this village in Nimba County and you and others were taken for
13:13:34 5 training with the NPFL, did you and the others have a choice of
6 whether or not to train with the NPFL?

7 A. At that time we never had any choice. There wasn't any
8 choice, issue of choice at all, to say that I was willing to go.
9 It was not a business of choice. It was a force to join them.

13:14:04 10 Q. At the Executive Mansion, going back there for a moment,
11 what nationalities were serving in the Executive Mansion Guard?

12 A. Well, he had people from Burkina Faso who were there,
13 people from the Gambia, there were Gambians, they were there, and
14 then he had Liberians there also. They were there. They were
13:14:46 15 also Special Forces.

16 Q. Was there any difference in the treatment, or assignments
17 given to the Liberians and the foreigners by Mr Taylor?

18 A. Yes, there was a difference because at the time I was with
19 them, the ones who were the foreign forces who were with him, he
13:15:27 20 trusted them. He believed them more than the Special Forces, who
21 were Liberians.

22 Q. Going back to the training that you gave at Camp Naama in
23 1990, what were the ages of the people that you were training?

24 A. Well, the ages were just like when we were in the NPFL. We
13:16:02 25 had SBUS who were training on the base. We had women. They had
26 their own unit. It was called the WAC's unit. They were also
27 there. We also had the men who were mature men. They were also
28 there.

29 Q. Were all of the people that you were training Sierra

1 Leoneans, or were they other nationalities?

2 A. Well, Sierra Leoneans were many, but we had some other
3 people who were there. We had some Liberians who were also
4 there.

13:16:52 5 Q. Mr Witness, a couple of times in your answers you referred
6 to Special Forces. Can you tell us what you mean when you talk
7 about the Special Forces in Liberia?

8 A. Well, the ones that they used to refer to as Special Forces
9 were those who entered with the war and those who were trained in
13:17:24 10 Libya and Burkina Faso. Those were the people who were called
11 the Special Forces, that is those who entered with the war.

12 Q. When you were a trainer at Camp Naama, what rank did you
13 have then?

14 A. I was a lieutenant.

13:17:45 15 Q. Do you recall the names of any of the other trainers at the
16 camp?

17 A. I was one, Mohammed Tarawalli, Mike Lamin, Sam Dripo,
18 Gongano, Rashid Mansaray. We were the people who used to train
19 those men.

13:18:37 20 MR KOUJIAN: Your Honours, some spellings. Tarawalli
21 I believe we have had before, but my spelling is different:
22 T-A-R-A-W-A-L-L-E-Y. Gongano, G-O-N-G-A-N-O, and then we had Sam
23 Dripo. The spelling I have is D-R-I-P-O although the witness
24 pronounced it differently. We have Rashid Mansaray, I believe
13:19:09 25 that spelling has been given before, yes:

26 Q. Were all of you teaching the same subjects, or were there
27 different subjects covered by different trainers?

28 A. Yes, we had different subjects that we used to teach. Like
29 in my case, and together with Mohammed Tarawalli, Gongano, Sam

1 Dripo, we gave them the physical training, but I was the first
2 person who had been there for almost six months before the others
3 met me there. Mike Lamin and Rashid Mansaray, they gave the
4 ideology training and sometimes Foday Sankoh himself used to join
13:20:34 5 them to give the class.

6 Q. Did you ever see the Commander in Chief, Mr Taylor, at that
7 camp?

8 A. I never saw him there at the time.

9 Q. Thank you. At the camp did the recruits have food provided
13:20:59 10 for them?

11 A. Yes, we used to receive supplies from Gbarnga. We used to
12 receive rice that they used to bring in bags. We used to receive
13 medicines.

14 Q. Did you have any weapons or ammunition in the camp?

13:21:28 15 A. We had weapons that were there with Foday Sankoh and
16 myself, who was an instructor, I had my own personal weapon that
17 I took to the place there and Mike Lamin himself - all of us who
18 were instructors, we all had weapons.

19 Q. Where did the weapons come from?

13:21:57 20 A. Those weapons came from Gbarnga and they were NPFL
21 property.

22 Q. When you talked about the rice and supplies coming from
23 Gbarnga, where in Gbarnga did it come from? From who?

24 A. The supplies were coming from the Executive Ground, that is
13:22:28 25 Gbarnga where Mr Taylor was, and it was Mr Taylor who used to
26 supply those foods to us.

27 Q. Do you recall the names now of some of the soldiers that
28 you trained at Camp Naama for this organisation?

29 A. Yes, Issa Sesay, one Morris Kallon, Mosquito, who was Sam

1 Bockarie. There were many, but those are the few whose names
2 I can call for now.

13:23:32 3 Q. Just to clarify something, Mr Witness, you said "Mosquito,
4 who was Sam Bockarie" and earlier you told us Christopher Varmoh
5 was named Mosquito. Can you comment on that?

6 A. Yes, I want the Court to know that the Liberians had their
7 own Mosquito, who was Christopher Varmoh, and the RUF also had
8 their own Mosquito, who was Sam Bockarie.

9 Q. Now, you mentioned that Foday Sankoh was at Camp Naama.
13:24:05 10 Did you hear Foday Sankoh speaking to the recruits?

11 A. Yes, Foday Sankoh used to speak to the recruits.

12 Q. Do you recall now anything that he would tell the recruits
13 at Camp Naama?

14 A. Well, he used to tell them that Sierra Leone had a one
13:24:38 15 party system at that time, so the country was corrupt and that he
16 was training them for them to go and free the people from that
17 one party system and for them to take over power and rule the
18 country. So, those were the things that he used to tell the men
19 during parade, and that they should be strong and that they
13:25:23 20 should be courageous.

21 Q. Did he ever indicate, that you can recall, how he would
22 accomplish this task of taking over the country in Sierra Leone?

23 A. Well, he used to say that, "When you are here and you are
24 training I can say I am a poor man, I don't have money, but all
13:26:01 25 that I am doing here it is my brother, who is Mr Taylor, that is
26 doing it." So, that was what he used to tell the men.

27 Q. Would you yourself ever talk privately with Foday Sankoh?

28 A. Yes, I used to talk with Foday Sankoh.

29 Q. Did Foday Sankoh ever mention Mr Taylor in your discussions

1 with him?

2 A. Yes, he used to talk about Mr Taylor.

3 Q. Can you recall now anything he said about Mr Taylor?

13:27:15

4 A. Well, he said that Mr Taylor was his brother and that what
5 he was doing, that is when he was training those men, it was
6 Mr Taylor who was doing it for him and that after the completion
7 of the training, for them to go, it was Mr Taylor that he
8 depended on to do everything, and so even myself, he used to
9 encourage me and he used to tell me that the job I was doing,
10 I should exercise patience and bear with him.

13:27:50

11 Q. Did Foday Sankoh ever tell you how he met Mr Taylor?

12 A. Yes, he said Mr Taylor and himself had met for a long time.
13 He said at one time he was in prison in Ghana and it was
14 Mr Taylor who fought hard for him to be released, and that they
15 all had gone to Libya and undergone training, so those were the
16 things he told me.

13:28:36

17 PRESIDING JUDGE: Thank you, Mr Koumjian. Mr Witness, we
18 are now going to take the lunchtime adjournment. We will have a
19 break of one hour and we will resume court again at 2.30. Please
20 adjourn court.

13:28:59

21 [Lunch break taken at 1.30 p.m.]

22 [Upon resuming at 2.34 p.m.]

23 PRESIDING JUDGE: Please proceed, Mr Koumjian.

24 MR KOUMJIAN:

14:32:50

25 Q. Mr Witness, after your assignment training at Camp Naama,
26 can you tell us the next assignment that you received?

27 A. My next assignment was to move with the men to the place
28 where we trained for.

29 MR KOUMJIAN: Your Honour, I neglected to advise the Court

1 that my colleague, Mr Mohamed A Bangura, is not with us this
2 afternoon.

3 PRESIDING JUDGE: I should have noted that appearance
4 myself, Mr Koumjian. I will put it on record.

14:33:32 5 MR KOUMJIAN:

6 Q. Can you explain, Mr Witness, what you mean moved to the
7 place that you trained for?

8 A. Well, I had told the Court that I was training the men for
9 the Sierra Leone mission, so after their passing out we had some
10 people who were part of the Special Forces. They took some
11 people to go to Pujehun. The other ones were to come to
12 Voinjama. We were to come and enter through the Koindu/Bomaru
13 end, so we came to Voinjama.

14 Q. Thank you. Mr Witness, you said "after their passing out"
14:34:43 15 is how it was translated to us. Can you explain what you mean by
16 the passing out?

17 A. After we had completed the training, that is what we call
18 passing out.

19 Q. Now, you said that "We went to Voinjama". Who went to
14:35:08 20 Voinjama with you?

21 A. I went to Voinjama with those men whom I had trained, and
22 Foday Sankoh too went with us, and we had other people who had
23 come from Gbarnga who came with some trucks. We came to Gbarnga.
24 That was where we met Mr Taylor at Voinjama.

14:35:55 25 Q. Thank you. Now, you said some people came from Gbarnga
26 with trucks. Can you tell us who those people were? Not
27 necessarily their names, but what kind of people came with
28 trucks?

29 A. They were soldiers, some of the Special Forces. They came

1 with the materials that we were to use. The ammunition and arms
2 that we were to use. That was what they brought.

3 Q. And just to be very clear, these soldiers that came with
4 the materials they were soldiers belonging to what fighting
14:36:35 5 force?

6 A. They were NPFL soldiers.

7 Q. You said that when you got to Voinjama that is where you
8 met Mr Taylor. Is that correct?

9 A. Yes, we met him there.

14:36:53 10 Q. Can you describe for the Court the meeting that you had
11 with Mr Taylor in Voinjama?

12 A. Yes, when we got to Voinjama I had told you that we got
13 there at night. Mr Taylor was on the ground which was referred
14 to as the Executive Ground, because wherever he was based there
14:37:30 15 was we referred to as the Executive Ground. So, he was there.

16 Then I brought my men, put them on parade and later Foday Sankoh
17 and Mr Taylor were in the house together with some other Special
18 Forces and they invited me and I went inside. Then I was able to
19 talk to Mr Taylor that night. And when Mr Taylor saw me he
14:38:19 20 thanked me for the job that I had done, but he did not just stop
21 there. We still had some other mission that we were to
22 accomplish, so he said we were to come to Sierra Leone to fight
23 and we should make sure that the mission that we were to come for
24 should be accomplished. We should keep the ball rolling.

14:39:02 25 Q. Thank you, Mr Witness. I want to ask you some details now
26 about these events in Voinjama. First do you recall, can you
27 give us any idea, of when it was that you went to Voinjama and
28 these events took place?

29 A. We came to Voinjama in 1991. That was in the month of

1 March. That was when we came to Voinjama. The group that came I
2 told you initially that we had two groups, which one came to us
3 towards the Lofa end, one was to go to Bomaru and the other one
4 was to go to Koindu. Before we arrived there, the other men who
14:40:03 5 were the Bomaru people had already left before we got there.

6 Q. So I take it from your answer, correct me if I am wrong,
7 that your group was the group assigned to go to Koindu?

8 A. Yes, that was the place where my group was to go.

9 Q. You said you brought your men out to the parade - to the
14:40:33 10 parade. First, can you tell us who are these men that you
11 brought to the parade ground there?

12 A. They were the ones whom I trained from Camp Naama. They
13 were the ones I put into the parade.

14 THE INTERPRETER: Your Honours, can the witness repeat his
14:40:59 15 last answer?

16 PRESIDING JUDGE: Mr Witness, the interpreter needs you to
17 repeat something. Pick up where you said, "They were the ones I
18 put into the parade". Continue from there, please.

19 THE WITNESS: The ones that I put on the parade were those
14:41:18 20 whom I had trained at Camp Naama, so I put them there so that the
21 CIC, Mr Taylor, would see them.

22 MR KOUMJIAN:

23 Q. Sir, these troops that you had with you, were they armed?

24 A. At that particular time we were not armed. When we were at
14:41:47 25 Voinjama, we had no arms.

26 Q. Okay, then I will come back to that in a moment. After the
27 meeting at the parade you said you were called into the house.
28 Is that correct?

29 A. Yes, yes.

1 Q. Can you tell us whose house was that?

2 A. It was General Dopoe Menkarzon's place, who was called
3 General Pepe.

4 MR KOUMJIAN: I believe that has been spelled before, but
14:42:34 5 the Dopoe we normally spell it D-O-P-O-E:

6 Q. Who was present at the meeting inside the house that you
7 have spoken about?

8 A. We had General Dopoe, who was the 2nd Battalion commander
9 in that area; there was Francis Mewon, who was one of the Special
14:43:13 10 Forces; there was Foday Sankoh himself, he was there; and there
11 were some other generals, they too were there, like Ibrahim and a
12 Gambian whose name was Lamin. He too was there.

13 Q. You mentioned an Ibrahim. Can you tell us any more about
14 who Ibrahim is?

14:43:55 15 A. Ibrahim, he was one of the Special Forces, but he was part
16 of the foreign forces which was part of the NPFL.

17 Q. Do you recall if he had a second name, Ibrahim, or a
18 surname?

19 A. He was Ibrahim Bah.

14:44:29 20 Q. When you were discussing this meeting earlier you mentioned
21 Mr Taylor. Was he present at this meeting?

22 A. Mr Taylor was at the house. We met him at Voinjama at the
23 house. He was there.

24 Q. And what did Mr Taylor say, if anything, during this
14:44:53 25 meeting?

26 A. I have told you that Mr Taylor told us - he thanked me a
27 lot for training those men, but that that was not going to be the
28 end of my mission. I had some other mission at hand that was to
29 come and fight in Sierra Leone. That was the next mission we had

1 at hand and that I should be strong and courageous and should
2 keep the ball rolling.

3 Q. Did anyone at the meeting indicate what the goal of the
4 mission was?

14:46:01 5 A. Well, that mission was to come and fight in Sierra Leone
6 and to take over power.

7 Q. Thank you. Now, Mr Witness, you mentioned your troops were
8 not armed at the time that they first arrived in Voinjama and at
9 the time of the parade. Did your troops eventually get arms and
10 ammunition?

11 A. Yes, we had arms and ammunition later on.

12 Q. Can you explain how you obtained - when you obtained first
13 - my first question, Mr Witness, is when did you get the arms and
14 ammunition for your troops?

14:46:51 15 A. I got it when we left Voinjama and moved to Foya.

16 Q. Where did the arms and ammunition come from?

17 A. I have told you that the arms and ammunition had been
18 brought in a truck and they were in the trucks until we got to
19 Foya where we were armed.

14:47:26 20 Q. Mr Witness, just so I am clear that I understand you, are
21 you saying that the trucks you mentioned that came from Gbarnga
22 that were with NPFL were the ones that brought the arms and
23 ammunition that you gave to your troops?

24 A. Yes.

14:47:48 25 Q. So after the meeting that night in Voinjama, can you tell
26 the Court what happened next?

27 A. The following day we moved and we headed for Foya and it
28 was there where the men were armed. After we had been armed, we
29 were to move to - we came to - we came near Koindu, but we did

1 not enter Koindu. We went to a place called Mendekoma. That is
2 along the border. That was where we came so we could organise
3 ourselves to move in.

14:48:57

4 Q. Thank you. Mr Witness, which side of the border is
5 Mendekoma?

6 A. Mendekoma is closer - it is on the Liberian border, but it
7 is nearer to Sierra Leone. You will be there and you will see
8 into Sierra Leone. You would be standing there and see right
9 into Sierra Leone.

14:49:24

10 Q. Thank you. After you organised yourselves in Mendekoma,
11 what did you do?

12 A. We moved to the Sierra Leone customs, because that was our
13 next target. The soldiers were there, so we started to fight.

14 Q. Who were you fighting against?

14:49:55

15 A. We were fighting against the Momoh soldiers, the SLA.

16 Q. That is the Sierra Leone Army soldiers?

17 A. Yes.

18 Q. And what happened in that fighting?

14:50:30

19 A. Well, when we entered the place, the place is called Baidu,
20 we captured one twin barrel from the soldiers who were there and
21 sent it back to Liberia, and we advanced to Koindu and we fought
22 in Koindu and captured the place from the soldiers.

23 Q. Mr Witness, I want to clarify the first place you
24 mentioned, the name. Can you mention it again. You said you
14:51:11 25 entered the place. The place is called?

26 A. Baidu.

27 Q. Okay, apparently the spelling is correct in the LiveNote.
28 Now after you captured Koindu, what happened?

29 A. When we captured Koindu, Foday Sankoh came there.

1 Q. Had Mr Foday Sankoh crossed the border with your troops, or
2 with the other troops, do you know?

3 A. No, he didn't cross over with any troops. He was in
4 Liberia.

14:52:01 5 Q. So after you took Koindu and you said he crossed the
6 border, did you see him?

7 A. Yes, I saw him.

8 Q. And then what happened?

9 A. When he came he addressed us, the fighters, and he told us
14:52:26 10 that the mission had started so we should be strong and should be
11 in readiness to move to the next target.

12 Q. Mr Witness, when you crossed into Sierra Leone, were you in
13 communication with anyone - any other forces or anyone - outside
14 of your location?

14:52:59 15 A. Yes, we were fighting together with the NPFL people, so
16 whatever we were doing there we would make sure that the NPFL
17 commander, who was Mr Charles Taylor, knew everything that we
18 were doing. We will tell him how the fighting was going on,
19 where we were. That was why Foday Sankoh himself came to confirm
14:53:33 20 our location. That was how it was right until the time we
21 entered deeply into the terrain.

22 Q. What means did you use to communicate to Liberia and to
23 Mr Taylor?

24 A. When the war started, the NPFL men who were the commanders
14:54:12 25 were bringing reports to Mr Taylor. Like General Pepe whom I
26 have spoken about would bring the reports about the things that
27 were happening on the ground, and we had Francis Mewon who would
28 also bring reports to Mr Taylor relating to the things that were
29 happening on the ground.

1 Q. But how did they communicate, Mr Witness? Do you know what
2 they used to get in touch - to send a message?

3 A. Well, after we had captured Pendembu we got a radio. Foday
4 Sankoh brought a radio man called Foday K Lansana. He was also
14:55:16 5 called Mr Nya. They brought a radio set. He was the first
6 communication man whom Mr Taylor - Mr Sankoh said his brother,
7 Mr Taylor, had given to him to set up the communication and
8 operate.

9 Q. Mr Witness, you talked about your troops and you talked
14:55:45 10 about them, including people you trained at Camp Naama. Besides
11 those people you trained at Camp Naama, were there any other
12 forces fighting with you in this invasion of Sierra Leone?

13 A. Yes, we and the NPFL, because even myself I was an NPFL,
14 and we had some other NPFL generals, other fighters. They were
14:56:22 15 with us when we did the invasion.

16 Q. What was your position during the time of this invasion of
17 Sierra Leone?

18 A. I was the commander who led the troops from Koindu, where
19 we were given ammunition to advance with my men who I had
14:57:05 20 trained. I was in command of them.

21 Q. Now, did there come a time that - let me strike that and
22 start the question again. Where did you obtain the ammunition
23 during your fighting? Was the ammunition that you brought with
24 you sufficient?

14:57:33 25 A. The ammunition we brought, not all of them were given to
26 us. They gave some to us. So when the first one depleted they
27 came back to take some others at Foya, because it was at Foya
28 where the ammunition was kept.

29 Q. What kind of weapons and ammunition were you using during

1 this initial invasion of Sierra Leone?

2 A. We used RPG, AKs, GMG and G3.

3 Q. And I am not sure if we have a definition yet of G3. Can
4 you tell us what a G3 is?

14:58:29 5 A. G3 is the - it is another rifle, but it is bigger than the
6 AK. It is more - it is stronger than the AK.

7 Q. Did Foday Sankoh stay in Sierra Leone with you and the
8 fighting forces?

9 A. He did not stay. He would visit and return.

14:59:05 10 Q. Where would he return to?

11 A. Gbarnga. They were in Gbarnga on the ground, so he would
12 come to Sierra Leone, spend some time and return.

13 Q. Now, Mr Witness, did you stay in Sierra Leone after
14 entering and you mentioned Voijnjama was March of 1991?

14:59:37 15 A. Yes, I stayed in Sierra Leone.

16 Q. For how long did you stay in Sierra Leone?

17 A. I stayed in Sierra Leone when - since when we came, I was
18 in Sierra Leone. I used to go back, but at that time I would
19 only go to fight. I used to go there to fight in order to
20 return, but I did not go there to stay.

15:00:14 21 Q. When you say you would go there to fight, you would go
22 where to fight, Mr Witness?

23 A. I will go to Liberia to fight.

24 Q. Okay. Do you recall what year it was when you went to
15:00:31 25 Liberia to fight?

26 A. It was in 1993 when the ULIMO occupied Voijnjama, so Foday
27 Sankoh called me and said his brother said I should send troops
28 to clear that place. When I am talking about Foday Sankoh's
29 brother, I am referring to Mr Taylor. So I went with troops, and

1 NPFL too were coming from the Gbarnga end, fighting to come to
2 Voinjama, where we were all to meet at that place to ensure that
3 we had cleared the place. So I fought there and I captured
4 Voinjama from the ULIMO. That was the fight I went for that I
15:01:34 5 told you about.

6 Q. When you were fighting in Liberia, after receiving this
7 direction from Foday Sankoh, who were you reporting to in
8 Liberia?

9 A. Well, I was reporting to - because the time we were
15:02:01 10 fighting I joined with one other NPFL man who is called General
11 Fayia. He was in charge of the Lofa end, so I joined forces with
12 him to fight and so whatever we were doing I reported to him.

13 MR KOUMJIAN: Your Honours, the spelling of Fayia is
14 F-A-Y-I-A:

15:02:31 15 Q. Now, Mr Witness, the troops that you had under your command
16 in this fighting in Lofa, who were they? Who were these troops?

17 A. They were RUF men.

18 Q. I believe, Mr Witness, this is the first time you have used
19 the word "RUF". Can you just explain that word to us? What is
15:02:56 20 the RUF?

21 A. The RUF were people who got trained at Camp Naama, whom I
22 told you about that I trained for the Sierra Leone mission. They
23 were called the RUF, that is Revolutionary United Front. Those
24 are the people with that name.

15:03:42 25 Q. Now, Mr Witness, how long did you remain in this fighting
26 in Lofa County?

27 A. Well, I was in Lofa - in Voinjama I spent about a month
28 about some days and then I left.

29 Q. What was your rank during the years '91, '92 and '93 that

1 you have been talking about?

2 A. Well I told you I was a lieutenant, but at that time I was
3 in Liberia and so when we launched the attack I was promoted to
4 captain. I went and at some point I was made colonel and acting
15:04:44 5 battle group commander.

6 Q. Mr Witness, do you recall what year it was that you were
7 named the acting battle group commander?

8 A. I became acting battle group commander in 1992.

9 Q. When you say "acting", does that mean you replaced someone
15:05:07 10 temporarily?

11 A. Somebody was in the position and he was removed. I went
12 there to act, yes. Yes, because somebody came that I was to hand
13 over to him.

14 Q. First this position battle group commander, can you explain
15:05:32 15 what it is?

16 A. Well, the battle group commander was in charge of the
17 fighters in the different front lines. He would get reports from
18 the commanders at the different front lines and he in turn would
19 forward the reports to the authorities who were above him.

15:06:15 20 Q. Was this position within the NPFL, or RUF?

21 A. It was in the NPFL and it was in the RUF as well.

22 Q. Okay, but the position that you took, were you acting
23 battle group commander in the NPFL, or in the RUF?

24 A. No, it was the RUF. It was the RUF, they brought about
15:06:45 25 that one, but when you are talking about battle group NPFL too
26 had battle group commanders.

27 Q. Who does the acting - who does the battle group commander
28 report to?

29 A. The acting battle group commander reported to the field

1 commander.

2 Q. Who was the field commander when you were acting battle
3 group commander?

4 A. It was Mohamed Tarawalli.

15:07:24 5 Q. Who was it that you replaced as battle group commander
6 temporarily?

7 A. It was a Mr John Kargbo.

8 MR KOUMJIAN: I see the spelling is correct:

9 Q. Why did you have to replace Mr Kargbo? What happened to
15:08:02 10 him?

11 A. John Kargbo, Foday Sankoh said he had suspected him of
12 having dealings with the enemies against whom we were fighting,
13 so that was why the position was taken from him and I occupied it
14 when I was there temporarily.

15:08:39 15 Q. When you were acting battle group commander, were you
16 engaged in fighting?

17 A. I was not engaged in fighting, but I monitored the various
18 front lines and at times I would visit the various front lines.

19 Q. Did you have any means of communication?

15:09:08 20 A. Yes, I had told you and the Court that we had - that we had
21 had a communication set which Mr Taylor had sent and he sent the
22 set together with an operator, so the set was on the ground where
23 Pa Sankoh would normally be lodged when he would visit us and we
24 too called the place Executive Ground. That was where the set
15:09:45 25 was.

26 Q. Did you use that set to report to any superiors?

27 A. Yes, we used it to communicate to Liberia to Mr Taylor.

28 Q. Mr Witness, did you ever communicate with Mr Taylor using
29 that radio?

1 A. Yes, I can remember I did it once when I requested for some
2 ammunition to be sent for us, because at that time the ones that
3 we had were getting to depletion levels so we asked for some
4 more.

15:10:44 5 Q. How do you know it was Charles Taylor that you were talking
6 to on the radio?

7 A. I had been with Mr Taylor and I spent a long time with him,
8 so I knew him and I knew his voice.

9 Q. On this occasion where you requested ammunition, what was
15:11:12 10 Mr Taylor's response?

11 A. He promised that he would send and some ammunition was sent
12 for us.

13 Q. Thank you. Now, Mr Witness, you have talked about this
14 operation that you were on in Lofa County. When you left Lofa
15:11:48 15 County, did anyone replace you?

16 A. Yes, somebody replaced me. It was Morris Kallon and Issa
17 Sesay.

18 Q. And were they - do you know if they were engaged in
19 fighting in Lofa against ULIMO also?

15:12:17 20 A. Yes, they too were fighting against ULIMO.

21 Q. What happened to Kallon and Sesay's group, if you know?

22 A. Well, Issa Sesay was taken from there and when he came back
23 to Sierra Leone Morris Kallon was there then. Morris Kallon was
24 still there, but they fought but couldn't - they couldn't
15:13:00 25 dislodge the ULIMOs. Since they could not overpower the ULIMOs
26 he planned to take a bypass to go to Gbarnga, but they couldn't
27 make it up and the manpower that he had all of them were killed
28 and Morris Kallon was able to escape. He survived that attack.

29 Q. Did he return immediately to Sierra Leone, do you know?

1 A. He returned, but not immediately after the incident. It
2 took some time before he came.

3 Q. Were Morris Kallon and Issa Sesay fighting along with any
4 other forces - any allies - in that fighting in Lofa?

15:14:06 5 A. Yes, I want to tell you, I want to tell the Court, that RUF
6 was NPFL's younger brother and whenever NPFL would get any attack
7 from ULIMOs their younger brother, which was the RUF, will go
8 there and fight together.

9 Q. So you indicated, Mr Witness, that the Kallon group was
15:14:43 10 defeated in Lofa County at that time. Did that apply also to
11 NPFL forces in Lofa County at that time?

12 A. Yes, the NPFL together with the RUF could not occupy the
13 position where the ULIMO were and so --

14 THE INTERPRETER: Your Honours, can the witness repeat the
15:15:12 15 last bit of his answer?

16 PRESIDING JUDGE: Mr Witness, again the interpreter
17 requires you to finish your answer. Pick up where you said, "The
18 RUF could not occupy the position where ULIMO were". Carry on
19 from there, please.

15:15:26 20 THE WITNESS: I said they could not occupy the position,
21 which was Voinjama. They could not take it from the ULIMO, so
22 the NPFL too had come from the Gbarnga end were fighting, they
23 too could not dislodge the men from there.

24 MR KOUMJIAN:

15:15:59 25 Q. Mr Witness, where did the various NPFL forces go after
26 ULIMO occupied Lofa?

27 A. Well, some came to Sierra Leone who were with the RUF.

28 Q. Do you recall the name of a commander of these forces of
29 NPFL that retreated from Lofa to Sierra Leone?

1 A. Yes, one of them came who was Colonel Jungle.

2 Q. Okay, thank you, Mr Witness. To the best of your
3 recollection now, do you recall what year it was then that
4 Colonel Jungle and some NPFL forces retreated into Sierra Leone?

15:17:22 5 A. It was in the year 1993 that they came into Sierra Leone.

6 Q. And, Mr Witness, I just want to make sure I didn't cut you
7 off. Were you thinking of any other names, or was it just
8 Colonel Jungle?

9 A. Well, Colonel Jungle came with other fighters, but he was
15:17:53 10 the commander.

11 Q. Do you recall Jungle's real name?

12 A. Jungle's real name was Tamba.

13 MR KOUMJIAN: And that's T-A-M-B-A:

14 Q. What tribe was Colonel Jungle?

15:18:28 15 A. He was Kissi.

16 Q. Do you recall what his assignment was, if you knew, within
17 the NPFL?

18 A. Jungle was a commander who too was with General Fayia at
19 that Lofa.

15:18:55 20 Q. Okay, thank you. We will come back to Mr Tamba later,
21 Mr Witness. Let me just go now to one other question about
22 Colonel Jungle. How long did Colonel Jungle stay with RUF in
23 Sierra Leone after being pushed out of Lofa County?

24 A. Well, Colonel Jungle was with the RUF right up to the end
15:19:33 25 of the war in Sierra Leone.

26 Q. Did he ever return to Liberia, or make trips to Liberia, to
27 your knowledge?

28 A. When he was with the RUF he used to go to Liberia, but at
29 that time the ULIMO were not armed. The time we started going to

1 Liberia the ULIMO were not armed any more.

2 Q. Mr Witness, you have indicated that ULIMO pushed RUF and
3 NPFL out of Lofa in 1993?

15:20:19

4 MR MUNYARD: Sorry to interrupt, but Mr Koumjian was asking
5 for some dates and a time frame and he asked about Colonel
6 Jungle, "Did he ever go back to Liberia or make trips to
7 Liberia?" The witness replied, "When he was with the RUF he used
8 to go to Liberia but at that time the ULIMO were not armed. At
9 the time we started going to Liberia the ULIMO were not armed any
10 more". Could we find out what time he is talking about now,
11 because for all I know it could be a very different time from the
12 time he has given just a moment ago.

15:20:42

13 PRESIDING JUDGE: Mr Koumjian?

15:20:58

14 MR KOUMJIAN: Can I respond. Your Honour, I am trying to
15 do the examination in a logical order. I don't understand this
16 to be an objection, but a request for clarification.

17 MR MUNYARD: It is not an objection at all. It is just
18 clarification.

15:21:12

19 MR KOUMJIAN: Then I would request that the procedure be
20 that I be allowed to ask my questions and often I am planning on
21 clarifying that anyway. I just think it would be more efficient
22 and then if there is further clarification necessary it can be
23 done in cross-examination.

15:21:25

24 PRESIDING JUDGE: If you are coming to this clarification,
25 come to it when - in due course.

26 MR KOUMJIAN:

27 Q. Well, I think my next question began - it is now off my
28 screen. It started out, "Mr Witness, you indicated ULIMO pushed
29 RUF and NPFL out of Lofa in 1993. Can you tell us when it was

1 that ULIMO no longer was blocking and occupying Lofa County"?

2 A. Well, they did not leave the place. I cannot tell you that
3 they left the place, but what I know about, because I was not at
4 that end from 1993 up to the time ULIMO were without arms,
15:22:30 5 because it came to a time when we ourselves, we the RUF, were
6 having pressure from the SLA soldiers. That was the time the
7 NPRC were advancing on the RUF positions, so I was in the jungle.
8 I was not along the border end any more, but Colonel Jungle was
9 with us and I learnt that the --

15:23:27 10 THE INTERPRETER: Your Honours, can the witness repeat that
11 one?

12 PRESIDING JUDGE: Again, Mr Interpreter, I notice this is
13 the third time in the course of the afternoon you have asked for
14 repeats. What is the problem, that you're not keeping up?

15:23:43 15 THE INTERPRETER: Your Honours, the witness uses an
16 expression that can be both negative and positive so he was
17 talking about the RUF, it could be had got or had not got contact
18 with the ULIMO.

19 PRESIDING JUDGE: I see. Mr Witness, the interpreter is
15:24:00 20 trying to keep up with you and understand what you are saying so
21 can you repeat the - your answer at the point where you say, "But
22 Colonel Jungle was with us and I learnt that". Continue from
23 there, please.

24 THE WITNESS: I said I learnt that the RUF too had been in
15:24:25 25 contact with the ULIMO because the ULIMO too were trying - were
26 about to be disarmed, so the RUF was in contact with them.
27 According to what I heard, they used to come to Sierra Leone and
28 return and our men too would come to them at Foya and return to
29 Sierra Leone.

1 MR KOUMJIAN:

2 Q. Okay, Mr Witness, you have talked about the NPRC. First
3 can you clarify what is the NPRC?

15:25:26

4 A. Well, NPRC they said was revolutionary - I don't know,
5 council something, but I really don't know the full meaning.

6 Q. Who what was the NPRC? Was it a government of a country?

7 A. Yes, the NPRC was a government for a country. They were -
8 it was the government of the soldiers, the Sierra Leone Army.

15:25:58

9 Q. You indicated that the RUF was pushed into the jungle by
10 the NPRC. Can you tell us what year you think that this
11 occurred?

12 A. Yes, in late '93 those men pushed the RUF to the border.
13 At that time the ULIMO too were not at the border.

15:26:43

14 Q. Now, when the RUF was pushed by the NPRC to the border did
15 the strategies of RUF change in any way?

16 A. Yes, we changed our strategy to fight.

17 Q. Can you tell us how you fought after being pushed to the
18 border to the jungle by the NPRC?

15:27:28

19 A. We divided ourselves into groups at different locations and
20 at that time he was not in Liberia when the border was closed.
21 He was with us in Sierra Leone when the NPRC pushed us. We
22 decided to have different jungles.

15:28:02

23 PRESIDING JUDGE: I am just a little unclear here. The
24 transcript appears to use the word Jungle with a capital J
25 meaning the person, but are we talking about the trees and the
26 bushes?

27 MR KOUMJIAN:

28 Q. Mr Witness, when you are talking now about being pushed to
29 the jungle, can you explain what you mean?

1 A. I mean the bush. We went there and I want you to know,
2 because I had spoken about Jungle before now, that was the name
3 of somebody who has taken up that name, he was a commander. He
4 was an NPFL member. But the time that I am referring now to this
15:28:45 5 jungle that I am talking about means the bushes that we went to.

6 JUDGE SEBUTINDE: Yes, but the witness did say I think in
7 line 7 that when the RUF was pushed by the NPRC he did not - he
8 was not with us in Liberia. Who does he mean?

9 MR KOUMJIAN: I believe he was referring to Foday Sankoh:

15:29:19 10 Q. Mr Witness, at the time - first of all, Mr Witness, you've
11 indicated the border was closed. When you say the border was
12 closed, what do you mean?

13 A. What I mean, because that road is the one from Sierra Leone
14 to the Liberian border, the road at Lofa, that was what we used
15:29:43 15 to go to Gbarnga. And our leader, Foday Sankoh, that was the
16 road he used to go and bring ammunition for us. But he had come,
17 he was with us in Sierra Leone when the ULIMO occupied the
18 border, when they took Foya, so he had no chance to return to
19 Liberia. He was with us when the NPRC in turn were advancing on
15:30:19 20 us and they pushed us.

21 Q. So, Mr Witness, when you talk about the border being closed
22 you are referring to ULIMO occupying Lofa and border areas, is
23 that correct, in Liberia?

24 A. Yes, that's what I'm talking about.

15:30:40 25 Q. You have indicated, is it correct, that this happened until
26 ULIMO disarmed? Is that correct?

27 A. Yes, ULIMO was there right up to the time the disarmament
28 went on in Liberia.

29 MR KOUMJIAN: Your Honours, I believe rather than asking

1 this witness to try to recollect that date, we have other
2 evidence that establishes the dates of the disarmament.

3 Q. Sir, Mr Witness, so during the time that the border was
4 closed was there any communication going on with Liberia?

15:31:27 5 A. Yes, communication used to go on with Liberia because we
6 had a communication set and the one that had been sent to us by
7 Mr Taylor, after that particular one we had already we had also
8 captured some other communication sets that were now with us.

9 Q. Do you know if Foday Sankoh was using the radio?

15:31:58 10 A. Yes, Foday Sankoh used the radio.

11 Q. Do you know who he communicated with on the radio?

12 A. Yes.

13 Q. Who would he talk to, or communicate with?

14 A. Well, he used to talk to his brother who is called
15:32:25 15 Mr Taylor.

16 Q. Now, Mr Witness, do you recall elections in Sierra Leone?

17 A. Yes, I recall that there was an election in Sierra Leone.

18 Q. Do you recall the year of the elections?

19 A. '96 they have an election in Sierra Leone and at that time
15:33:05 20 we were still in the bush.

21 Q. Now, Mr Witness, at the time of the elections did the RUF
22 have any plans because of the elections? Let me start over. Let
23 me strike that question. Mr Witness, what was the attitude
24 within the RUF towards the elections? Perhaps that's vague.

15:33:32 25 PRESIDING JUDGE: It is vague. I don't know if you are
26 asking for a policy decision on the part of the organisation.

27 MR KOUMJIAN: Yes:

28 Q. Mr Witness, did Foday Sankoh speak about the elections?

29 A. Yes.

1 Q. That's fine. You have answered that. Now my question is
2 what did Foday Sankoh indicate was the RUF political position
3 towards the elections at that time?

4 A. Well, when we started getting the information that there
15:34:14 5 was going to be an election, at that time Foday Sankoh was in the
6 jungle. That is a bush where we had established a jungle for him
7 and the place was called Zogoda. That was where he was. So he
8 called we the commanders to tell us what the plans were that the
9 government had with regards the elections.

10 So Foday Sankoh said that it appeared to him as though the
11 government never wanted to recognise us because whilst the
12 fighting was going on they were pushing on with the elections and
13 they did not even call our attentions to that. So he said we
14 were also going to carry out some kind of offensive that will not
15:35:09 15 allow the elections to hold. So we were called upon and we came
16 to Zogoda.

17 I came there and I was there when his radio man came to
18 call him and he said to him that his brother, Mr Charles Taylor,
19 wanted to speak to him and then Foday Sankoh got up and then I
15:36:31 20 joined him and we both went to the radio house. So when we went
21 there we entered and then he sat down and he started talking to
22 his brother, that is Mr Taylor. And when they spoke on the talk
23 lasted up to 20 to 25 minutes during which Foday Sankoh explained
24 how we had been cut off and that we were not even getting
15:37:15 25 supplies from Liberia any longer and what the plans were on the
26 government side, that they had decided to carry on with the
27 elections, and so he had called on his commanders to meet him and
28 that he wanted to give them a plan that we shall go on an
29 offensive to make sure that the election does not hold at all and

1 that the offensive that we were to undertake we should make
2 fearful and that anybody who we will capture, we will have to
3 amputate that person and we will ask that person to take his
4 hands off the elections.

15:38:22 5 So he was telling him that these were the plans that I had
6 put together, that was why I called my commanders to come so that
7 I will explain to them the offensive that we were to undertake.
8 And then his brother told him in his reply that the plan is not a
9 bad one, that is Mr Taylor, and so two days after they had spoken
15:38:54 10 to each other we went on the offensive.

11 Q. Thank you, Mr Witness. I want to go back over this a
12 little bit. You said Foday Sankoh was in Zogoda. Is that
13 correct?

14 A. Yes, that was where he was.

15:39:15 15 Q. When he called you to come to Zogoda where were you?

16 A. I was at the northern jungle.

17 Q. What district is Zogoda in?

18 A. Zogoda is in the Kenema District.

19 Q. When you got to Zogoda, you said that you entered into a
15:39:44 20 radio room with Foday Sankoh. Is that right?

21 A. Yes.

22 Q. And that you heard this radio conversation that you just
23 told us about between Sankoh and Taylor, correct?

24 A. Yes.

15:40:05 25 Q. Who was present in the room?

26 A. Well, the radio man who was there was Foday Sankoh's radio
27 man and he was called Z-Man. And whilst Foday Sankoh was going
28 he went with his securities, but when the securities got there
29 they didn't enter the radio room. The securities took positions

1 around the booth where the radio was located and then Foday
2 Sankoh entered the radio room and he sat down. And myself, I
3 stood just in front of the radio room where he entered. And let
4 me tell you where the radio was, it was not as if it was a place
15:41:13 5 when you went there it had a door that you could lock. It was
6 something like a thatch hut, so that was how it was. But
7 somebody who will stand in front of the place whilst somebody was
8 talking on the radio with somebody else, you will hear and
9 understand.

15:41:46 10 Q. Were you able to hear what Foday Sankoh was saying?

11 A. Yes, I heard what Foday Sankoh was talking and I also heard
12 Mr Taylor's responses to him.

13 Q. At that time within the RUF what was your position?

14 A. I was area commander. I was a major and it was later that
15:42:24 15 I became colonel.

16 Q. How many area commanders were there within the RUF at the
17 time of the '96 elections?

18 A. I was one of the commanders in the northern jungle and we
19 also had Superman who was also an area commander in the Western
15:42:59 20 Area. We had Peter Vandi who was in Kailahun District as area
21 commander as well.

22 Q. Who was above, or who were above the area commanders in the
23 RUF structure?

24 A. It was the man who was field commander and who was
15:43:28 25 lieutenant colonel. He was Mohamed Tarawalli and he was the boss
26 over the area commanders.

27 Q. Was there a battle group commander at that time?

28 A. Yes.

29 Q. Who was that?

1 A. We had Sam Bockarie who was Mosquito. He was the battle
2 group commander.

3 Q. So would it be correct to say then, Mr Witness, that you as
4 one of the three area commanders were among the top half dozen or
15:44:06 5 so commanders of the RUF?

6 A. Please repeat that one.

7 Q. Were you in the top command of the RUF?

8 A. Yes, I was one of them myself.

9 Q. You said you were in command of the northern jungle. Can
15:44:39 10 you explain to us what areas of Sierra Leone were covered by that
11 term?

12 A. I was in the Tonkolili District. That was where I was.

13 Q. Okay. Now, Mr Witness, just so we are absolutely clear,
14 was the RUF participating in the elections in 1996?

15:45:20 15 A. We didn't take part in the elections. That was why we went
16 on that offensive that I have told you about, because the
17 government did not recognise us.

18 Q. After Foday Sankoh's radio conversation with Charles Taylor
19 that you heard, did he ever talk about what Taylor had told him
15:45:42 20 to anyone else in your presence?

21 A. Well, Foday Sankoh was a man who did not hide things away
22 from us. There were things that he used to tell his commanders
23 or the soldiers. He told us that, "The plan for which I have
24 called you people for us to carry on, my brother called me and I
15:46:27 25 have explained everything to him and in his response he told me
26 that the plan is not a bad plan at all".

27 Q. Well, to be clear about what you just said, are you saying
28 that Foday Sankoh told the other commanders that Taylor said it
29 was not a bad plan?

1 A. Yes, I said what Foday Sankoh discussed with Taylor he
2 explained to all the commanders who were present there in that
3 meeting.

4 Q. Okay. Now you said that Foday Sankoh talked about cutting
15:47:22 5 hands. Is that correct?

6 A. Yes, he said anybody whom we captured, we should amputate
7 that person and we should tell the person that he should take his
8 hands off the elections. So the people who were to go and vote
9 were the people that we were supposed to do those things to. So
15:48:03 10 we had different targets to which we were to carry on with those
11 offensives.

12 Q. Now, Mr Witness, you said that the people - that you were
13 going to cut the hands of the people who were to go and vote.
14 How would you determine who were the people who were to go to
15:48:22 15 vote?

16 A. Well, when we see you, because what normally happened in
17 Sierra Leone, when somebody was going to vote, that person was to
18 have an ID, that is an identity card. It was that ID card that
19 you would use before you were allowed to enter the voting booth.
15:48:54 20 So that was how we managed to know the people. And some of them,
21 after voting, you will see a blue indelible ink on their fingers.
22 So that was how we identified them.

23 Q. You said there were various targets for this planned
24 attack. What was your target that you were assigned to?

15:49:28 25 A. Well, I was to go to Masingbi.

26 Q. When you say go to Masingbi, what do you mean?

27 A. That was supposed to be my own target. That was where I
28 was supposed to fight. That was where I was supposed to attack.

29 Q. Do you recall any of the other targets given to any of the

1 other commanders?

2 A. Yes, the western jungle it was Mohamed Tarawalli and
3 Superman and their target was to be Magburaka and Makeni and I
4 was to go to Masingbi and Rambo and Mosquito were to go to Kenema
15:50:38 5 Town. And those who were in Kailahun, they also had their own
6 targets that they were supposed to face and that was the Pendembu
7 area.

8 MR KOUJIAN: Masingbi may not have been spelled before.
9 It is M-A-S-I-N-G-B-I.

15:51:02 10 PRESIDING JUDGE: Thank you, Mr Koumjian.

11 MR KOUJIAN:

12 Q. Going back for a moment to this meeting with the
13 commanders, you said - who was present at the meeting, which
14 commanders that you can recall now?

15:51:24 15 A. Well, we were many. All the commanders like from Kailahun,
16 some from the Western Area, in the case of those it was Mohamed
17 Tarawalli who came to represent them. There were some other
18 people like Issa Sesay. He was already at that time under
19 punishment so he had been at Zogoda already. And like Augustine
15:51:51 20 Gbao, he was also present in the meeting. We had some other
21 people who were around the Pujehun target area. They also came,
22 like Rocky CO. He was called Emanuel Williams. Rambo. We had
23 Jungle. He was based at Peyama, but he was present in that
24 meeting and his own target was Kenema.

15:52:33 25 Q. Okay, thank you. Now you have mentioned Rambo. There are
26 a couple of Rambos. Is that correct?

27 A. In the RUF?

28 MR MUNYARD: Has this witness said that there are a couple
29 of Rambos?

1 PRESIDING JUDGE: I don't recall the witness saying that.

2 MR MUNYARD: And is that not a leading question?

3 PRESIDING JUDGE: Yes, I was about to say that, so in
4 effect you are leading him.

15:53:01 5 MR KOUMJIAN: Sure:

6 Q. Mr Witness, can you tell us who Rambo is? What was his
7 nationality?

8 A. He was a Liberian.

9 Q. The Rambo that you were referring to, was he a member of
10 the RUF or was he an SLA?

11 MR MUNYARD: That assumes he must be either or, that
12 question.

13 PRESIDING JUDGE: I was going to say there is another
14 choice. In fact there's two other choices.

15:53:28 15 MR KOUMJIAN:

16 Q. Was he a member of the RUF?

17 A. He was an RUF member.

18 Q. Now, Mr Witness, you also mentioned Jungle was present. Is
19 this the same person that you mentioned earlier?

15:53:53 20 A. It is the person that I have spoken about before.

21 Q. At the time of this operation, first of all did the
22 operation have a name?

23 A. Yes, the operation had a name and the name that the
24 operation had was Operation Stop Elections.

15:54:20 25 Q. Do you recall at this time was the border still blocked by
26 ULIMO?

27 A. Yes.

28 Q. So you mentioned Colonel Jungle. Do you know if he - well,
29 strike that. Strike that. After you had the meeting with the

1 commanders and you were given your assignment, what did you do?

2 A. I went directly to my own target, and that is Masingbi, to
3 attack there.

4 Q. In attacking that target were you in command of any troops?

15:55:15 5 A. Yes, from the northern jungle I went with my men with whom
6 we attacked Masingbi and that was my own target for us to stop
7 the elections.

8 Q. You indicated that about two days after the radio call
9 there was the meeting with the commanders, is that correct, in
10 Zogoda?

11 A. Yes, that was what I told you, that after they had had the
12 radio communication it was then that we went for that meeting
13 that where the Pa said that we should go on that operation, Stop
14 Elections.

15:56:00 15 Q. And when you are talking about that meeting and you say the
16 Pa who are you referring to?

17 A. I am talking about Foday Sankoh.

18 Q. Now you said you left immediately after that meeting. How
19 long did it take you to get to your men in the northern jungle?

15:56:24 20 A. Well, I walked for the whole day and the whole night and we
21 spent about - we spent 72 hours from Zogoda to the place, we
22 spent three days, but you walk for the whole night, the whole
23 day, but if you walk for the whole day and the whole night you
24 might not spend up to that three days for you to get there.

15:56:56 25 Q. When you arrived and met with your men in the northern
26 jungle, did you meet with them before the attack?

27 A. I met with them and when I arrived I had to explain the
28 reason for which we were called and what was supposed to be the
29 next thing that we should do. So we had a parade because that

1 parade was our daily routine. It was something we did every
2 other day. And it was on the parade ground that we would know
3 whether we had a mission at hand or we did not have a mission.
4 So it was at the parade ground that I explained to them exactly
15:57:59 5 the things that we had from Pa Foday Sankoh with regards the
6 elections and what the operation was supposed to be that we
7 should carry out to stop the elections.

8 Q. Did you attack Masingbi?

9 A. Yes, I attacked Masingbi, but I was unable to overrun
15:58:30 10 there.

11 Q. Who were you fighting against?

12 A. I was fighting against the SLA and the Kamajors.

13 Q. So your group from the northern jungle, were you able to
14 capture any civilians or persons participating in the elections?

15:59:05 15 A. We were unable to capture people who were taking part in
16 the elections in that of our own area.

17 Q. Did you, Mr Witness, hear any reports of how the operation
18 was carried out by other area commanders and whether there was
19 any success?

15:59:31 20 A. Well, the other area commanders were able to succeed
21 because like in the case of Magburaka, Mohamed Tarawalli,
22 Superman and others, they were able to capture there and they
23 also captured people and they carried out what the operation
24 called for and that was to make sure that the people who were
16:00:11 25 captured, they should amputate them so as for them to take their
26 hands off the elections.

27 Q. Well, what I understood you to say is they should amputate
28 them. Did you hear whether any amputations actually took place?

29 A. Yes, I heard that they amputated people and they even

1 carved "RUF" on some people's chest. They used razor blade to
2 write on people's chest "RUF".

3 Q. Thank you. Now, Mr Witness, do you recall the Abidjan
4 peace accord?

16:01:07 5 A. Yes, I remember that.

6 Q. Can you tell us where you were when the Abidjan accord was
7 signed?

8 A. I was still in my area, that is the northern jungle. That
9 is Tonkolili District. That was where I was.

16:01:33 10 Q. And at some point after the Abidjan accord did you learn of
11 a new political development in Freetown?

12 A. The time they went to sign the peace there was no fighting
13 going on, because at that time the enemies never used to come on
14 offensive and we also never used to go on the offensive again.

16:02:16 15 Q. Now, Mr Witness, at some time after that did something
16 occur in Freetown that you recall? Let me strike that. Let me
17 ask another question. Mr Witness, you said you were in the
18 northern jungle. Did you ever get an order to leave the northern
19 jungle?

16:02:45 20 A. Well, it was not in the case of the Abidjan peace accord,
21 because we are talking about the Abidjan peace accord. So when
22 you talking about Abidjan peace accord, at that time I never had
23 an order for me to leave that jungle.

24 Q. Moving on, when did you get the order to leave the Jungle?

16:03:09 25 MR MUNYARD: I don't think he has said, has he, that he did
26 get an order. I thought he just said he didn't get an order.

27 MR KOUMJIAN: Okay, thank you.

28 THE WITNESS: The time I got the order to leave, at that
29 time Foday Sankoh was not in the country. He had gone to Abidjan

1 and he was arrested in Nigeria when he arrived there. But in the
2 year 2000 it was the time I received instruction for me to leave
3 the bush and that was when the AFRC - when they had launched a
4 coup d'etat in Freetown. That was the time I received the orders
16:04:13 5 to join the soldiers.

6 MR KOUMJIAN:

7 Q. So, Mr Witness, you recall the time of the AFRC coup,
8 correct? I am not asking you now, but you just remember that
9 happening, correct?

16:04:28 10 A. Yes, I recall that it happened.

11 Q. And tell us what news you received - what orders you
12 received when you heard about the coup?

13 A. I received an order that said I should join the AFRC, those
14 were the soldiers, that I should join them and that I should go
16:04:58 15 with manpower, that is fighters, and they were gunmen and that we
16 should go and join the soldiers. And they gave me certain things
17 that I was supposed to do at any time we met on the way. We were
18 supposed to meet with them at a place that is called Five Mile
19 and that place is along the way when you are leaving Magburaka to
16:05:42 20 go to Kono, that is when you pass through Matotoka, then you will
21 get to the town that is referred to as Five Mile. So that was
22 where I was supposed to meet with the soldiers. And when I would
23 meet them I was supposed to use the sign using a torchlight. I
24 will flash the torchlight three times and then they would also
16:06:26 25 respond the same way I did. But when we got there we were unable
26 to see them. The only thing that they did was that they also
27 made a sign that would let us understand that they were already
28 there. So they took some packets of ammunition and placed them
29 on the road where we were coming from.

1 Q. Okay. Mr Witness, who did you receive this order from to
2 go and join the AFRC - to go and join the soldiers?

3 A. I got the order from Sam Bockarie.

4 Q. What was Sam Bockarie's position at that time?

16:07:30 5 A. At that time Sam Bockarie was the field commander.

6 Q. What happened to Mohamed Tarawalli?

7 A. Well, it was in 1996 that the Kamajors and the SLA
8 soldiers, they attacked Zogoda. And at that time when Pa Sankoh
9 was leaving to go to Abidjan it was Mohamed Tarawalli who came to

16:08:15 10 Zogoda to replace him. So when they were attacked they took a
11 road that led towards the Kailahun area and, according to them,
12 they said when they reached towards the Moa River they were
13 attacked by enemies and since then we haven't been able to see
14 Mohamed Tarawalli up to this moment. So it was Mosquito that

16:08:52 15 took his place.

16 Q. Now you mentioned Foday Sankoh being arrested. Was he
17 arrested before or after this AFRC coup when he was arrested in,
18 you said, Nigeria?

19 A. Yes, he was arrested before the AFRC coup.

16:09:19 20 Q. So at that time who was commanding the RUF in Sierra Leone?

21 A. It was Sam Bockarie who was the commander.

22 Q. Are you aware if there were any communications with Foday
23 Sankoh during the time he was under detention in Nigeria?

24 A. Yes, communication used to go on because the order that we
16:09:54 25 received came from there even before we went to join the
26 brothers.

27 Q. Explain what you mean by the order came from there before
28 you went to join the brothers?

29 A. Well, the order that I received from Sam Bockarie, he did

1 say that the Pa, who was Foday Sankoh, sent a message that we
2 should join the brothers, and that is the soldiers who had taken
3 over the country at that moment and they were now in Freetown.
4 And it was for that reason that he was passing the order on to me
16:10:41 5 that I should go with my men to join the brothers.

6 Q. Do you know, Mr Witness, what year Foday Sankoh was
7 arrested in Nigeria?

8 A. Foday Sankoh was arrested at the time he went to Abidjan in
9 1996 for the peace accord and it was that year that I know that
16:11:12 10 he was arrested in Nigeria.

11 Q. Now, Mr Witness, do you recall how much time passed between
12 Foday Sankoh's arrest and the AFRC coup?

13 A. I want you to go over that again.

14 Q. Do you recall, Mr Witness, how many years passed, if any,
16:11:36 15 between Foday Sankoh's arrest and the AFRC coup?

16 A. I can say it was just like one year, because it was in '97
17 that we joined the AFRC.

18 Q. Thank you. Mr Witness, you had stated earlier that the
19 coup was in 2000, just so you're aware?

16:12:09 20 A. No, no, it was 2007. It was a mistake that I made.
21 Although I made that mistake, but that was not the case. It was
22 in '97 that the coup took place.

23 Q. Thank you, Mr Witness. So after you met with these SLAs at
24 Five Mile what happened then to you?

16:12:38 25 A. I didn't meet them there, just like I have said, but I and
26 my men, I put them in parade and we were there and we ambushed on
27 either sides. The road that was coming from the Kono side, I
28 ambushed there. The path from Matotoka, I also set an ambush
29 there. So that was that - it was in those area that we were.

1 Q. Okay. When you say, Mr Witness, that you ambushed, what do
2 you mean when you say you ambushed?

3 A. Well, I set an ambush because they had called me to come
4 and join the men, so if they had come and did not see me they
16:13:38 5 were supposed to wait, because they had told me that when we meet
6 with them the signs that we were supposed to use and they also
7 knew about the sign. So when I reached there and did not meet
8 them there I was not pleased at all. So I thought that they had
9 applied a strategy. So in that case I also decided to set
16:14:21 10 ambushes to protect the areas where I have already occupied. So
11 if anything was going to happen I would have been able to defend
12 my men.

13 Q. What did the SLAs do then?

14 A. So later they came from Matotoka. When they came - because
16:14:54 15 when I was leaving I went with a radio set and I went with Mr Nya
16 who was called Foday K Lansana and then we mounted the radio, we
17 tried to call them at first, but we were unable to get them, but
18 later they came and met us. So we and them embraced one another.
19 So from there they took us and we all drove to Matotoka. So they
16:15:50 20 lined up the rebels and the soldiers all together in the same
21 parade and the commanders from the SLA side and those from the
22 rebel side, they all were able to talk to the men.

23 From there we moved and went to Makeni. From Makeni we
24 moved towards Freetown. We came to Benguema. From Benguema we
16:16:30 25 moved to Hastings, because at Hastings we had some men who were
26 there and that was Superman and his own men who were based within
27 the Western Area, they were the ones who had already occupied
28 Hastings. So when we got to Hastings at night the jubilation
29 that we did in the Hastings camp, the ECOMOG people heard the

1 sounds so they also very early in the morning did not wait. They
2 also launched an attack. So we also fought and fighting started
3 in that area.

4 Q. Which groups were fighting in that Hastings area?

16:17:48 5 A. It was the RUF and the SLA on one side and the ECOMOG on
6 the other side. So that was what the fighting was like. And
7 they also had the Kamajors with them.

8 Q. After this fighting in Hastings where did you go?

9 A. Well, I came back to Benguema and we were all there, but we
16:18:33 10 received instructions that we should move to Freetown and it was
11 Johnny Paul Koroma who sent the order.

12 Q. And did you respond to Johnny Paul Koroma's order?

13 A. Yes, we responded to him.

14 Q. And where did you go?

16:19:03 15 A. We went to Freetown. That was where we went.

16 Q. Did you bring any of your troops with you into Freetown?

17 A. Yes, the fighters, I took them to Freetown.

18 Q. When you got to Freetown were you given any position?

19 A. Yes, they gave me a position there.

16:19:35 20 Q. First of all, let me ask can you do you recall
21 approximately how long after the coup it was that you arrived in
22 Freetown?

23 A. Well, when the coup took place it did not take a long time
24 that we went, because the coup took place and the next day we
16:20:02 25 received the instruction to join the men.

26 Q. Well, can you give me an estimate of the number of days or
27 weeks or months between the coup and when you arrived in
28 Freetown?

29 A. Well, I can say almost a week when we came to join those

1 men.

2 Q. What was the position that you were given in Freetown?

3 A. When I got there, I was in a council that was formed by
4 them and later on they removed me from there and I was at the
16:20:58 5 front line commanding the front lines, but I was anti-looting
6 squad commander.

7 Q. So, Mr Witness, you said you were first in a council. Can
8 you describe what that council was?

9 A. That council was the Supreme Council where in there you had
16:21:34 10 authorities like JP and other authorities who used to discuss,
11 who used to plan about the war what things that they were
12 supposed to do to carry out - to carry on with the war. Those
13 were some of the things that they did.

14 Q. When you say JP can you tell us the name of the person you
16:22:01 15 are talking about?

16 A. It is Johnny Paul Koroma that I am talking about.

17 Q. What was his position, if any, on the council?

18 A. Well, Johnny Paul Koroma was the head of state.

19 Q. Who else was on the council at the time that you were a
16:22:25 20 member?

21 PRESIDING JUDGE: I don't quite understand that question.

22 Do you mean what representatives of the same organisation were on
23 it, or --

24 MR KOU MJIAN:

16:22:43 25 Q. Who were the members of the council at the time you were on
26 the council. You said you were removed later, but at time you
27 were on the council who were the other members?

28 A. We had Tamba Brima. We had SO Williams. We had JPK that I
29 have spoken about which is Johnny Paul Koroma. We had Issa

1 Sesay. We had Gullit. Mosquito too was a member of that
2 council. There were many that were members, but I can only
3 recall those few ones for now.

16:23:47 4 Q. Mr Witness, you said Mosquito was on the council. Which
5 Mosquito are you referring to now?

6 A. I am talking about the RUF Mosquito who was Sam Bockarie.

7 Q. Did Sam Bockarie then come to Freetown after the coup?

8 A. Yes, after the coup he came to Freetown.

9 Q. And do you recall how long he stayed in Freetown?

16:24:13 10 A. Well, he did not spend a long time in Freetown. He spent
11 some weeks in Freetown and then he later went to Kenema where he
12 was based.

13 Q. Mr Witness, at the time that you were a member of this
14 council did anyone from another country come to meet with the
16:24:35 15 council?

16 A. Yes, we had another person who came from a different
17 country to meet us.

18 Q. Who was that?

19 A. It was Mr Ibrahim Bah that I had spoken about before. He
16:25:06 20 came and met us, because he met first those of us in the RUF,
21 because we knew him before. We had fought alongside with him
22 before in Sierra Leone. So he brought a message that Mr Taylor
23 gave him for him to give to us. So when he came and met us he
24 told us that, "The Pa, who is Mr Taylor, sent me to come and talk
16:25:56 25 to you so that you and the brothers whom you have come to join,
26 that is the AFRC men, he is asking that you work together".

27 Q. Was Ibrahim Bah at that time to your knowledge a civilian
28 or a military person?

29 A. Well, I knew that Ibrahim Bah was an NPFL. He was a

1 soldier, he was a fighter and he was one of the Special Forces.
2 I have spoken about him when I said he was a fighter and one of
3 the Special Forces.

4 Q. Do you know what rank he held within the NPFL?

16:26:49 5 A. He was a general.

6 MR KOUMJIAN: Your Honour, I have more questions about the
7 meetings with Mr Bah but perhaps this would be a good time and
8 perhaps we could get an update on the situation?

9 PRESIDING JUDGE: Thank you, Mr Koumjian.

16:27:07 10 MR MUNYARD: Madam President, do you want to release the
11 witness first?

12 PRESIDING JUDGE: Yes, I think I will do that first.

13 Mr Witness, we are now going to be adjourning shortly until
14 tomorrow morning. We have some administrative matters to deal
16:27:18 15 with. However, I must warn you that between now and the time
16 that you finish all your evidence in the Court you should not
17 discuss your evidence with any other person. Do you understand?

18 THE WITNESS: Yes, sir.

19 PRESIDING JUDGE: Please assist the witness, thank you.

16:28:05 20 Mr Munyard, have you any news for us?

21 MR MUNYARD: Yes, I do, Madam President. I spoke to
22 Mr Griffiths not very long before we came back into court at half
23 past two our time and he had not then finished cross-examining
24 the witness and he did not anticipate that he would have finished
16:28:27 25 by the end of this afternoon, but of course he said to me, "I
26 will update you at the end of the afternoon". Well, the end of
27 the afternoon in England is an hour away from now. They will
28 still be in court now. Courts normally sit between - in the Old
29 Bailey five past two until between 4.15 and 4.30 unless they want

1 to sit on a little bit late or rise a little bit early, but those
2 are the normal court times in the afternoon at that particular
3 court. So that's the position. The latest that I know is that
4 he is not anticipating being able to be released from that case
16:29:09 5 until some time during the day tomorrow.

6 PRESIDING JUDGE: Thank you, Mr Munyard.

7 MR KOUMJIAN: Your Honours, I understand the situation that
8 counsel can't provide further information. The only thing I
9 would like to bring to the Court's attention now for
16:29:28 10 consideration is that the Prosecution will be applying to have
11 the Court impose time limits on the parties in the examination of
12 the next witness. This is a practice that has been done in many
13 domestic courts, it's very common practice I think in almost all
14 of the trials at the ICTY at the current time and our own
16:29:51 15 position is while it is normally 50/50, the time division, I
16 believe we would be willing to accept one day to do the direct,
17 the essential parts of the direct.

18 This is not a situation we like. To be very frank with the
19 Court we believe the current witness is a critical witness and it
16:30:12 20 not to our advantage to interrupt his testimony, but it's the
21 only way that we can ever hear, we believe, the testimony of 399.

22 PRESIDING JUDGE: Mr Koumjian, whilst I don't wish to
23 interrupt you, it would appear you are putting us on notice of a
24 possible application. Is that what's happening?

16:30:28 25 MR KOUMJIAN: Correct.

26 PRESIDING JUDGE: And in due course you will refer us to
27 relevant rules, et cetera.

28 MR KOUMJIAN: Yes, thank you.

29 PRESIDING JUDGE: If in fact you do proceed with such an

1 application.

2 MR KOUMJIAN: And to give the Defence fair notice that that
3 would be our application also.

4 PRESIDING JUDGE: I see. Thank you.

16:30:43 5 JUDGE LUSSICK: Just to give a bit more notice,
6 Mr Koumjian, you would be submitting that the Prosecution be
7 given one day with the witness and I presume you would be saying
8 that the Defence cross-examine for one day?

9 MR KOUMJIAN: No, we are willing to give the Defence the
16:31:03 10 remainder of the time. I would like to have a half hour for
11 redirect if necessary, but that's all that we are asking for and
12 that I believe would give the Defence significantly more time
13 than the Prosecution has for direct examination.

14 JUDGE LUSSICK: Thank you.

16:31:21 15 PRESIDING JUDGE: We will therefore adjourn until tomorrow
16 at 9.30.

17 MR MUNYARD: Madam President, I was just going to say I
18 won't reply at this stage except to say I think it's only
19 appropriate that Mr Griffiths is the person who replies because
16:31:43 20 he is the person - if an application is made, because he is the
21 person who has prepared this cross-examination.

22 PRESIDING JUDGE: Just a minute. Is it for the witness
23 before us now or the prospective witness? The prospective
24 witness.

16:31:54 25 MR KOUMJIAN: The prospective witness.

26 PRESIDING JUDGE: I appreciate the difference. I see.
27 That was not entirely clear.

28 MR MUNYARD: No, I think my learned friend and I were at
29 one, but the Court may not have been. The other thing is it is

1 completely unheard of in the Courts of England and Wales that I
2 have ever practiced in to impose such time limits. It may be the
3 case in other jurisdictions.

4 PRESIDING JUDGE: You may have heard me ask for an
16:32:18 5 indication concerning rules et cetera, so we will deal with that
6 if and when it arises.

7 MR MUNYARD: It's only because my learned friend referred
8 to domestic courts as well. It may well be, but not in the one
9 that I come from.

16:32:29 10 PRESIDING JUDGE: Thank you.

11 [Whereupon the hearing adjourned at 4.34 p.m.
12 to be reconvened on Tuesday, 11 March 2008 at
13 9.30 a.m.]

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WITNESSES FOR THE PROSECUTION:

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