



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 10 SEPTEMBER 2009
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Ms Doreen Kiggundu

For the Registry:

Ms Rachel Irura
Mr Benedict Williams

For the Prosecution:

Ms Brenda J Hollis
Mr Mohamed A Bangura
Mr Christopher Santora
Ms Ula Nathai-Lutchman

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Morris Anyah

1 Thursday, 10 September 2009

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:30:12 5 PRESIDING JUDGE: Good morning. We will take appearances
6 first, please.

7 MS. HOLLIS: Good morning, Mr President, your Honours,
8 opposing counsel. This morning for the Prosecution, Brenda J
9 Hollis, Mohamed A Bangura, Christopher Santora, and Ula

09:32:13 10 Nathai-Lutchman.

11 PRESIDING JUDGE: Thank you, Ms Hollis. Yes, Mr Griffiths.

12 MR GRIFFITHS: Good morning, Mr President, your Honours.

13 For the Defence today myself, Courtenay Griffiths. With me,
14 Mr Morris Anyah, and we are joined again today by Ms Kathryn

09:32:30 15 Hovington.

16 PRESIDING JUDGE: Thank you, Mr Griffiths. Before we
17 continue, Mr Taylor, I will just remind you that you are bound by
18 your declaration to tell the truth.

19 Yes, please continue, Mr Griffiths.

09:32:38 20 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

21 [On former affirmation]

22 EXAMINATION-IN-CHIEF BY MR GRIFFITHS: [Continued]

23 Q. Mr Taylor, you will recall that yesterday we began the
24 process of looking at the testimony of various witnesses given
09:32:53 25 against you during the course of these proceedings, yes?

26 A. Yes, that is correct.

27 Q. And we were looking at the testimony of one Suwandi Camara,
28 yes?

29 A. Yes.

1 Q. And we had looked at various allegations that he made
2 against you, yes?

3 A. Yes.

4 Q. Now, I would like us today, please, to continue with that
09:33:18 5 process. Now, in terms of that witness, Mr Camara, the final
6 matter that I want to deal with in his regard is this: Now, do
7 you recall that we - the last suggestion we dealt with was the
8 suggestion that Ibrahim Bah had to flee from Liberia because
9 there was a suggestion that you wanted to execute him. You
09:34:12 10 remember that?

11 A. I remember, yes.

12 Q. Well, the final matter I want to deal with in respect of
13 this witness is this: On the 11 February 2008, at page 3575 of
14 the transcript, the witness said this - again asked questions by
09:34:47 15 Mr Werner:

16 "Q. Now, Mr Witness, you said that Mustapha - that's
17 Mustapha Jallow - was your nephew. Who were you talking
18 about?

19 A. Tell him that - tell him that Mustapha Jallow - General
09:35:01 20 Mustapha Jallow, who was one time LDF commander and also
21 became EMG security commander, was my nephew.

22 Q. I have one last question for you. You told us on
23 Friday and then several times today that the RUF was the
24 brother of the NPFL, and today you said that the RUF was
09:35:25 25 the younger brother of the NPFL, what do you mean when you
26 said that?

27 A. RUF - tell him that the NPFL were the seniors of the
28 RUF. Because if you see that RUF was able to enter into
29 Sierra Leone to gain power, it was through the help of

1 NPFL. Because when the RUF started the war in Sierra
2 Leone, at that time I was not in Liberia. But at the time
3 I was entering in Liberia at 1991, I said I found - found
4 some of our people, the Gambians, who were given an
09:36:01 5 assignment with RUF. I saw NPFL soldiers, the Liberians
6 who were with RUF, and since in Burkina, my leader,
7 Dr Manneh, what he told me was that we, the Gambians, SOFA
8 and the Sierra Leoneans would join Charles Taylor to help
9 him in his fighting and Charles Taylor will also help us to
09:36:26 10 fight in our countries."

11 Now, taking things in stages. First of all, was Mustapha
12 Jallow a general?

13 A. Yes, Mustapha Jallow was a general.

14 Q. Was he one time LDF commander?

09:36:44 15 A. No, he was not. Not to my knowledge, no.

16 Q. What does "EMG security" stand for?

17 A. EMG would Executive Mansion Guard.

18 Q. Was he, Mustapha Jallow, Executive Mansion Guard security
19 commander?

09:37:04 20 A. No, he was never commander.

21 Q. Who was commander of the Executive Mansion Guard?

22 A. The late Cassius Jacobs.

23 Q. Now, were the NPFL "the seniors of the RUF", Mr Taylor?

24 A. Well, not knowing exactly what he means by "senior", but if
09:37:44 25 he meant that there were cooperation between the NPFL and the RUF
26 within the period that I have spoken about, maybe that's his
27 interpretation. But at the time he is coming into Liberia that
28 he claims that he comes into Liberia - and I don't have any
29 reason to confirm or deny his being in Liberia, but I don't know

1 him - I would say that there was no big brother/small brother
2 relationship with the RUF. At the period between '91 and up to
3 May '92 that I dealt with with the RUF, it was simply, for me, a
4 matter of security. ULIMO had come out. I worked out a
09:38:36 5 programme to protect my borders. I had no other ambition in
6 Sierra Leone except security. And once we had that conflict in
7 '92, we broke it off, we cut it off. There was just no interest
8 other than security that I had in Sierra Leone.

9 Q. And just so that we are clear, Mr Taylor, when you say
09:38:58 10 "security", precisely what is it that you mean?

11 A. I mean ULIMO is infiltrating out of Sierra Leone. There is
12 a common enemy being fought. We make arrangements to have our
13 special operations people go in. They are on the border to fight
14 ULIMO where they are coming from in Sierra Leone so we do not
09:39:20 15 have to fight them on Liberian soil. This was my sole purpose
16 for RUF during that period between 1991 - mid 1991 until May of
17 '92, and only that.

18 Q. And you note that the witness says that he entered Liberia
19 in 1991. As far as you are aware, Mr Taylor, when did the
09:39:46 20 Gambians join you in Liberia?

21 A. The Gambians joined me in Liberia in 1990, April. When I
22 returned from Burkina Faso the Gambians came, including their
23 leader, Dr Manneh.

24 Q. Did any further Gambians enter Liberia thereafter?

09:40:09 25 A. Well, to be frank about it, I don't know. There could have
26 been maybe family members or other people coming in. I really
27 don't know. I can't help with that. It's possible, but I really
28 don't know.

29 Q. And help me, were there Gambians given an assignment "with

1 the RUF?"

2 A. None whatsoever. I, Charles Taylor, never assigned any
3 Gambian or Liberian, for that matter, with the RUF. Never.
4 Never did. I needed the Gambians for my personal security,
09:40:50 5 whether they were around me or within the country as my eyes and
6 ears, and there was no way I would have sent them any other
7 place.

8 Q. Because you note the witness says, "the Gambians who were
9 given an assignment with the RUF". What do you say about that,
09:41:11 10 Mr Taylor?

11 A. That's a blatant lie. If a Gambian went to the RUF, he
12 went there on his own, but not through an assignment by me.
13 Never did I assign anybody with the RUF.

14 Q. Right. Now, Mr Taylor, I want to move on from that witness
09:41:42 15 now, please, to deal with another witness.

16 PRESIDING JUDGE: Yes, Ms Hollis?

17 MS HOLLIS: Thank you, Mr President. So as not to have
18 been unduly disruptive, the Prosecution has waited until the end
19 of the references to this witness's testimony, but we do wish to
09:42:01 20 enter an objection that aspects of that witness's testimony have
21 been mischaracterised in the sense that relevant pages of the
22 testimony which would have made clear the context of the evidence
23 that was referred to were not included. Now, we will be
24 addressing that in cross-examination, but we did want to make a
09:42:20 25 record of our objection.

26 PRESIDING JUDGE: Yes, we will certainly note that,
27 Ms Hollis. I don't know whether you want to reply to that or
28 not.

29 MR GRIFFITHS: I'd prefer not to, Mr President, because it

1 seems perfectly obvious that the Prosecution will, in due course,
2 have an opportunity of correcting any alleged error on our part.

3 PRESIDING JUDGE: Yes, exactly. Yes, thank you.

4 MR GRIFFITHS:

09:42:46 5 Q. Now, the next witness I want to deal with, Mr Taylor, is
6 TF1-588. Now, on the 22 September 2008, at page 16786 of the
7 transcript, the witness said this --

8 PRESIDING JUDGE: Just before you go on, did you say 588?

9 MR GRIFFITHS: 588.

09:43:22 10 PRESIDING JUDGE: What's showing on the LiveNote is 558.

11 MR GRIFFITHS: 588.

12 PRESIDING JUDGE: It should be 588.

13 MR GRIFFITHS: Yes.

14 "Q. At this period in the early stages, that is, 1991 to
09:43:42 15 1992, were you able to establish any connection between
16 events in Liberia and events in Sierra Leone?

17 A. Well, I think in our minds this connection was
18 self-evident. There were two sets of explanations. The
19 first one you would see the conflict in Sierra Leone being
09:44:05 20 spawned by the conflict in Liberia. On a very personal or
21 almost anecdotal level you would see some of the same faces
22 you had been - people you had been meeting in Liberia would
23 be over. I mentioned Sam Bockarie or Foday Sankoh. You
24 would see the same people. Some of the Lebanese people I
09:44:28 25 had seen in the entourage of Mr Taylor I would see on the
26 Sierra Leonean side as well. You have a fairly sizeable
27 community - Lebanese community - in Liberia as in Sierra
28 Leone and so that was on that level. But other people also
29 saw journalists, analysts. It felt like it was a regional

1 war. It was spreading out. Even though it didn't reach
2 eventually Ivory Coast and Guinea, neighbouring Guinea,
3 Conakry, there was a lot of talk about this regional kind
4 of cancer of war, destructured conflicts as I mentioned
09:45:08 5 earlier. An understanding that the whole region was
6 imploding. So on these two levels, the self-evident level
7 of a conflict spilling over from Liberia into Sierra Leone
8 and the other one having a look at the map and feeling like
9 there was a regional war linked maybe to fundamental causes
09:45:27 10 that were similar in both countries."

11 Now, let's pause there for a moment. Now, Mr Taylor, this
12 suggestion made by the witness that there were Lebanese from your
13 entourage involved in Sierra Leone, what do you say about that?

14 A. In fact, there were no Lebanese ever involved in any
09:46:02 15 entourage of mine. And I am glad in that passage he mentioned
16 journalists. If there had been any Lebanese or any Caucasian
17 involved in the Liberian war, it would have been spread over
18 every newspaper page across the globe. It's a lie. There were
19 never any Lebanese in my entourage ever.

09:46:24 20 Q. And note, from the question, this is supposed to be the
21 situation in 1991/'92. Now, was that the case, Mr Taylor?

22 A. Never the case. Never the case. In fact, if we look at -
23 I'm sure we are going to get into it - one of the - I think he
24 came along either as an expert or a witness, a journalist that
09:46:52 25 claimed - that was arrested by the NPFL on suggestions from his
26 government and sent over. There were foreign journalists
27 throughout that area.

28 If there had been any Caucasian, I want to tell you, during
29 that particular period, or any other period involved in the

1 Liberian civil war or with me, it would have been published very
2 clearly. There was no such thing, Lebanese or even any other
3 Caucasian involved. There was purely a Liberian war.

09:47:40 4 Q. Now, the other aspect of this evidence from the witness is
5 this: "The conflict in Sierra Leone being spawned by the
6 conflict in Liberia." Now, Mr Taylor, you yourself have accepted
7 on more than one occasion that the boundaries between Liberia and
8 Sierra Leone are a vestige of a colonial past and really have no
9 meaning in cultural or sociopolitical terms. So do you accept
09:48:12 10 that at one level what happened in Sierra Leone was spawned in
11 Liberia?

12 A. I don't accept that at all, because if I understand - you
13 know, if we say that the war in Sierra Leone was spawned by the
14 activities in Liberia, then this should be also the case, it
09:48:31 15 should have gone to Guinea, it should have gone to Ivory Coast.
16 Or let's take another part of Africa where for so many years you
17 had a war in Mozambique, why didn't that war start another war in
18 another country that one could say would be spawned by - this, as
19 I am beginning to see the language being used, I don't quite -
09:48:56 20 you know, this witness looks like one of those analysts that
21 could have been responsible for the accusations at that time that
22 the Liberian civil war, because it was led by a civilian and
23 there were all military Heads of State, at least the majority in
24 West Africa, this was supposed to be an attempt to destabilise
09:49:16 25 the region. This is - there is no - I totally disagree with
26 that.

27 Q. Well, Mr Taylor, this particular witness gave evidence in
28 open session. His name is Stephen Smith. Do you know him?

29 A. Oh, that's the very gentleman, Mr One Man Workshop.

1 Stephen Smith is the individual I referred to that his government
2 asked me to arrest and send across the border because of his
3 activities and I sent his American passport to the embassy in La
4 Cote d'Ivoire. He is the same man that is responsible for Africa
09:49:53 5 Confidential. One Man Workshop wrote a lot of nonsense across
6 the African continent. You would think that this was a major
7 operation, Africa Confidential. One man, Stephen Smith. I
8 didn't even know - I couldn't associate the name with the number.

9 Q. And what are you suggesting when you say that you deported
09:50:13 10 him?

11 A. Well, Stephen Smith - we knew that Stephen Smith was coming
12 in. We were working in association with the United States
13 embassy in La Cote d'Ivoire because Monrovia was out of reach.
14 We've talked about communication equipment being supplied to us
09:50:38 15 from the Central Intelligence Agency in La Cote d'Ivoire, the
16 branch in La Cote d'Ivoire, to help remove Americans and supply
17 us with communications. Stephen Smith had come in, we knew he
18 was coming in to study the situation and help to identify
19 Americans in that particular area.

09:51:01 20 Q. Who employed him?

21 A. Well, he came through the embassy, the US embassy in La
22 Cote d'Ivoire, so I was assume that he was employed by the
23 United States government. We were told that Stephen Smith would
24 be coming in and we should look after him and he should move
09:51:20 25 freely throughout our area and we accepted.

26 Q. Employed by which arm of the United States government?

27 A. Well, with the type of work that Stephen Smith was doing in
28 Liberia at the time, I have all reason to believe that he was an
29 agent of the Central Intelligence Agency.

1 Q. So what happened to him after he arrived?

2 A. Stephen Smith arrived. We granted him all necessary
3 protection. He moved around. He identified areas where
4 Americans were. We evacuated Americans. We were given
09:51:50 5 sophisticated radios. In fact, the very Yanks Smythe called
6 Butterfly operated one of the radios. The name of those radios
7 were called Fly-Away. Fly-Away is the brand name. These are
8 very sophisticated radios that you could just whip up a little
9 thin antenna and communicate almost anywhere.

09:52:12 10 Stephen Smith came in, we protected him, but he broke the
11 regulation, that's Stephen Smith. He crossed the line and
12 entered the area where the NPFL under Prince Johnson was
13 operating. That is around an area of Monrovia, the very
14 Coca-Cola factory area that we have heard about in this Court.

09:52:38 15 It was a very dangerous situation for Stephen Smith. I don't
16 know whether he was trying to play big and bad. He crossed and
17 went on the other side, spoke to the opposition on the other
18 side, crossed and came back and his people felt that it was too
19 dangerous. We did arrest Stephen Smith. We were asked to pick
09:52:56 20 him up. We picked him up and all --

21 Q. Who by?

22 A. By the NPFL. We picked Stephen Smith up, we took him to
23 Harbel. He was not kept under any terrible condition as he
24 claims. He was put on a vehicle. He was driven to the border and
09:53:14 25 his passport was sent by one of our agents to his embassy in La
26 Cote d'Ivoire, his United States passport. Stephen Smith.

27 PRESIDING JUDGE: Just at that point, Mr Taylor, you've
28 just told us the NPFL, but earlier you said, "His government
29 asked me to arrest him and send him across the border" because of

1 his activities and send his American passport to the embassy in
2 La Cote d'Ivoire.

3 THE WITNESS: Yes.

4 PRESIDING JUDGE: So was it the American government that
09:53:54 5 asked you to arrest him?

6 THE WITNESS: That's the American government. He's
7 American, yes, your Honour.

8 PRESIDING JUDGE: No, but was it the American government
9 that - the US government asked you to arrest him, is that
09:54:02 10 correct?

11 THE WITNESS: That is correct. And let me qualify that.
12 There was --

13 PRESIDING JUDGE: Sorry to interrupt, but the reason I
14 asked you that is because you have just said that we were asked
09:54:14 15 to pick him up by the NPFL.

16 THE WITNESS: Okay. We, the NPFL, were asked to pick him
17 up.

18 PRESIDING JUDGE: All right. What I have just put to you
19 is how the record reads. You said, "We were asked to pick him
09:54:36 20 up" and Mr Griffiths said, "Who by?" You said, "By the NPFL."
21 That's why I am saying to you earlier you said it was the US
22 government who asked you to arrest him.

23 THE WITNESS: That's an error. Our handlers at the embassy
24 in La Cote d'Ivoire asked the NPFL, that had been told to allow
09:54:59 25 Stephen Smith to come in and make sure that he was protected in
26 carrying out his duties of identifying and locating Americans,
27 because he crossed the enemy line and they figured was a threat
28 to his own security, asked us to pick him up and send him back
29 across the border and we did.

1 PRESIDING JUDGE: Yes, I understand.

2 MR GRIFFITHS:

3 Q. Now, Mr Taylor, you speak of Stephen Smith crossing enemy
4 lines into INPFL territory?

09:55:29 5 A. That is correct.

6 Q. As far as you are aware, did he enter Sierra Leone?

7 A. No, not to my knowledge. No, Stephen Smith was operating
8 in the general area between Kakata and Monrovia. INPFL is the
9 Independent National Patriotic Front that was commanded by Prince
10 Johnson.

09:55:46

11 Q. The reason why I ask whether he entered Sierra Leone is
12 this: During the course of his testimony on the 22 September
13 2008, page 16787 of the transcript, his testimony continued in
14 this vein:

09:56:03

15 "Q. Now you mentioned that it would appear in your minds
16 at the time that the war in Sierra Leone was spawned by
17 Liberia. Is that correct?

18 A. The word I used was spawn, so in that sense yes.

19 Q. All right. And then you mentioned names of persons you
20 would see in Liberia. On a personal note you said you
21 would see certain faces on the Liberian side and see them
22 also on the Sierra Leonean side. Apart from seeing faces
23 on both sides, is there any reason for you to say that the
24 war was spawned from the Liberian side?

09:56:21

25 A. Through your question I perceive that. Obviously with
26 the benefit of hindsight, or in hindsight, things would
27 appear less self-evident maybe as they were for us at the
28 time. We had been covering the Liberian civil war. Some
29 of the people in Mr Taylor's entourage were Sierra Leoneans

09:56:39

1 and the move of Mr Taylor to capture the capital was
2 stalled. He had difficulties to conquer Monrovia, partly
3 due to the fact that must be known to the Court; the
4 intervention of the West African peacekeeping force,
09:57:18 5 ECOWAS. For all these reasons, the Sierra Leoneans in
6 Mr Taylor's entourage turned to their own country."

7 As far as you are aware, where in that question it's
8 suggested that Stephen Smith was in a position to identify
9 certain faces in Liberia and in Sierra Leone, what do you say
09:57:41 10 about that, Mr Taylor?

11 A. It's just not - unless he was acquainted with people. In
12 fact, the first instance, there were no Sierra Leoneans in my
13 entourage. It's highly probable that Stephen Smith could have
14 seen the Gambians that were in my entourage and could have
09:58:00 15 mistaken them for Sierra Leoneans, but there were no Sierra
16 Leoneans in my entourage. And for him to even say that there
17 were Sierra Leoneans on both sides, then that means that he
18 should have known them, okay, because if you can identify people
19 so ably in your testimony, at least he should have come up with
09:58:17 20 some names, "Well, I saw John Brown in Mr Taylor's entourage and
21 guess what happened, when I went to Sierra Leone I saw John Brown
22 in Sierra Leone." So, you know, this is the kind of stuff that
23 one like Stephen writing and knowing his own professional
24 background I think it's very, very, very immature of him to speak
09:58:39 25 in such loose terms.

26 There were no Sierra Leoneans in my entourage and I don't
27 know if he crossed into Sierra Leone, but if he went into Sierra
28 Leone, it had to be not through Liberia, not through the NPFL
29 side, because the period that we are talking about, '91, '92,

1 except he had - maybe his government had special arrangements
2 through ULIMO lines. But at this particular time there is no way
3 that Stephen Smith can go through our side. Maybe he may have
4 flown into Freetown and come through, but he did not enter Sierra
09:59:16 5 Leone from our side and there were no Sierra Leoneans in my
6 entourage.

7 Q. Well, let's try and put a timeframe on the answer given by
8 that particular Prosecution witness. Remember he says:

9 "The move of Mr Taylor to capture the capital was stalled
09:59:36 10 partly due to the fact of the intervention of the West African
11 peacekeeping force, ECOWAS."

12 So help us. When did ECOWAS intervene?

13 A. To the best of my recollection, ECOWAS finally got into
14 Liberia around August, if I am not mistaken, of 1990.

09:59:58 15 Q. Now, help us. In August of 1990, was there any kind of
16 NPFL military involvement in Sierra Leone?

17 A. No, the NPFL had no military involvement in Sierra Leone at
18 this time. But even more important, he has got his facts wrong.

19 This is what - let's review the evidence that was presented
10:00:20 20 before this Court. Let's look at Herman Cohen's account, the
21 Assistant Secretary of State for African affairs intervening in
22 Africa. We did not take Monrovia because the United States
23 government asked us not to attack Monrovia. I sat with Herman
24 Cohen. We agreed to keep a corridor open into Sierra Leone and
10:00:43 25 because of the amount of civilians in Monrovia, it would have
26 resulted to massive loss of life. Stephen Smith does not know
27 what he is talking about.

28 ECOWAS - ECOMOG coming into Liberia did not stop us from
29 taking the city. They did not. Remember, Doe is subsequently

1 killed as soon as they arrive in Liberia. There is - we have
2 peace talks and peace talks. Finally, it's not until a year
3 later that I launch an attack called - this is Operation Octopus
4 to take Monrovia. So he has got the facts wrong. It was not
10:01:22 5 ECOMOG that stopped me from taking Monrovia; it is the
6 United States government that asked me not to take Monrovia at
7 the period that Stephen Smith is talking about.

8 Q. Now, bear in mind, Mr Taylor, you have told us that this
9 individual, Stephen Smith, entered Liberia at the time in order
10:01:41 10 to identify Americans for evacuation?

11 A. That is correct.

12 Q. Now, bearing in mind the timeline of the conflict in
13 Liberia, when did that occur?

14 A. When did what occur, his entry?

10:01:57 15 Q. His entry and when the Americans were concerned about
16 removing American nationals from Liberia.

17 A. This is 1990. In our areas of conflict, the Americans were
18 concerned. There were several thousands of Americans living
19 throughout greater - so-called greater Liberia. So he came in
10:02:16 20 under the cover of being a journalist but his mission were,
21 wherever he travelled and identified Americans that wanted to
22 leave, okay, we will be informed and we would help to evacuate
23 them through La Cote d'Ivoire.

24 Q. And when did he leave Liberia?

10:02:33 25 A. Stephen Smith left Liberia - I would put it to late 1990 to
26 early 1991 that he left the NPFL area.

27 Q. Now, he left the NPFL area and went where?

28 A. We took him straight to the Ivorian border and let him off
29 at the Ivorian border.

1 Q. I ask for this reason. It is not in dispute that the RUF
2 invasion of Sierra Leone occurs in March 1991?

3 A. That is correct.

4 Q. Now, help us, Mr Taylor. Based on that timeline, can you
10:03:16 5 see any reason why Stephen Smith would be going to Sierra Leone
6 to "see the same faces"?

7 A. There is none. There is none. That's why I am seeing, he
8 doesn't know what he's - he has got his facts all mixed up.
9 Except where he probably is God and anticipated a war, I don't
10:03:38 10 see how he could have spoken about something that in fact had not
11 happened. And by that I mean there is not a war in Sierra Leone,
12 so how can you be going there, you know, seeing faces from
13 another war that has been spawned out of Liberia.

14 Q. Now, let us look at another aspect of his evidence, shall I
10:04:04 15 we. On 22 September 2008, at page 16824 of the transcript, this
16 witness said this - he is speaking of an interview conducted with
17 you, Mr Taylor, and question number one from me is this: Do you
18 recall being interviewed by this man in the year 2002?

19 A. Yes.

10:04:39 20 Q. How did that interview come about?

21 A. To the best of my recollection, this was in France. I was
22 in France, and a corps of journalist want to come and see me. In
23 fact, some of my securities identified Stephen Smith and they
24 said, "No, no, no, no, this man cannot come." So I said, "Oh,
10:05:02 25 Stephen Smith." Some of them did not know that we had known that
26 I had known certain things about Stephen Smith that they did not
27 know. And so I agreed to speak to him.

28 Q. Now, he told this Court, having been shown a document,
29 Prosecution exhibit 33B:

1 "Q. I will just read that, and this is part of the answer
2 that Mr Taylor in this interview gives to a question that
3 comes in the paragraphs before. Now I will read the
4 question, and I will just read part of the answer I have
10:05:42 5 just referred to. The question was: 'What do you think of
6 the peace efforts in Sierra Leone? Sometimes it seems you
7 were treated as if you were to resource peace; other times
8 as if you were nothing more than diamond traffickers.' And
9 as part of that answer we have this: 'Yes, I think the war
10:06:05 10 in Sierra Leone is a war for diamonds, but not because
11 Liberia wants those diamonds. We already have diamonds.
12 The war is taking place because the British want those
13 diamonds.' "

14 Pause. Did you say that?

10:06:21 15 A. Yes, I did.

16 Q. And what did you mean by that?

17 A. Well, who are the people that are fighting in Sierra Leone?
18 Who have been contracted? You have Sandline, you have Executive
19 Outcome, all these people that have been brought in. You have
10:06:35 20 the - Sierra Leone has been a British near protectorate for so
21 many years. Most of the companies that are doing business in
22 Sierra Leone over the years even before the war are all what?
23 Anglo and other companies. So if anybody - why would I be
24 interested in diamonds in Sierra Leone when I have them? So if
10:07:00 25 anybody really - if this whole war in - you know, as I listen to
26 wars, if this whole conflict in Sierra Leone is reduced to the
27 want of diamonds, I mean, then they missed the boat so greatly.
28 Just as I'm hearing now the war in Congo is for coltan. Wars in
29 Africa and other wars of history have never - well, what about

1 the oil war? Was the war in Iraq about oil? So nobody can
2 reduce these conflicts to commodities. It's never been that way,
3 and it's nonsensical for people to say the war in Sierra Leone is
4 because of diamonds. So I told him - well, anyway - in fact, I
10:07:42 5 was really, really being sarcastic. Well, if the war in Sierra
6 Leone is about diamonds, then it's not because Liberia or I want
7 the diamond, then the British want the diamonds, since - because
8 if you look at The Heart of the Matter, which was published by
9 this gentleman that sat on the panel of experts. I forgot his
10:08:06 10 name --

11 Q. Ian Smillie?

12 A. Ian Smillie, who you got a British Canadian, an analyst,
13 and as soon as you hear these words "analyst" used out there, you
14 know most of them - and I don't claim 100 per cent - when you
10:08:24 15 hear "analyst", that's connection to intelligence. You pay
16 somebody to come up with a study, and you can almost get any
17 result that you want. And the study comes out and says: Oh,
18 guess what happened? The war in Sierra Leone is about diamonds.
19 And everybody starts going: Diamonds, diamonds, diamonds. All
10:08:41 20 these wars in Africa, they've been because of commodities? These
21 are traditional, historical, and other wars. It's never been
22 about commodities. So I told him, "Well, if you think that we
23 went into Sierra Leone - or you say we went there for diamonds, I
24 have diamonds." I didn't go there - the people that would really
10:08:56 25 want the diamonds are the British.

26 Q. Well, he went on to interpret your answer in this way,
27 Mr Taylor, because the question he was asked continues in this
28 way:

29 "Q. Now, what did you understand was the issue about

1 diamonds that related to the war at that time?

2 A. I understood from the answer given by Mr Taylor that he
3 qualified the war in Sierra Leone as being essentially a
4 resource-driven war over the control of the diamond mines,
10:09:28 5 first thing; and secondly, I noted that he, in a way,
6 turned the tables on accusations that were levelled against
7 him to be involved in exploiting the Sierra Leonean
8 diamonds and affirming that British officials with
9 companies based in Canada were involved, actually, in these
10:09:47 10 diamonds - illegal diamond dealings, and that was the
11 reason why the British took so keen an interest in the
12 Sierra Leonean events and had sent over a military force
13 into Sierra Leone, which was obviously news to me, and a
14 relevant part of the interview - for the first time you get
10:10:04 15 the answer, or the version by Mr Taylor, to accusations
16 that had been levelled constantly against him over the
17 preceding months.

18 Q. What specifically were those allegations to your
19 recollection?

10:10:19 20 A. The allegations were especially levelled by British and
21 American officials that Mr Taylor was - even though he was
22 now an elected President - still involved in something that
23 would be more expectable from a warlord being involved in
24 the illegal diamond trafficking out of Sierra Leone and
10:10:40 25 through Liberia, and sanctions had been imposed on Liberia
26 in connection with these accusations levelled against him.

27 Q. Now, the latter part of that answer says that 'and we
28 already have diamonds'. I think if I just take you further
29 down on the last three lines of the paragraph where it

1 goes: 'Liberia has been exporting diamonds for 150 years
2 now. Suddenly the world is at war to make for peace in
3 Sierra Leone.' Now, you being somebody who was familiar
4 with Liberia, what is your knowledge about the export of
10:11:18 5 diamonds by Liberia?

6 A. If you compare Liberia to Sierra Leone, the idea
7 introduced by the parallel with the Saudi Arabia and its
8 petroleum wealth would be that Liberia was awash with
9 diamonds, whereas - and didn't need to import or let Sierra
10:11:44 10 Leonean diamonds transit through Liberia. My knowledge was
11 that diamond mining was more important in Sierra Leone than
12 in Liberia, and so this was Mr Taylor's statement at that
13 time. I think, when I early on pointed out that we felt
14 that there should have been an accompanying article to
10:12:01 15 contextualise this, was one of the reasons you would

16 obviously - for this answer you would need, as a background
17 for a reader who is not supposed to be familiar on a
18 day-to-day basis with events in West Africa, you would have
19 to point out first of all that accusations were levelled
10:12:03 20 against Mr Taylor so you would understand that he is
21 answering back to these accusations, giving his version of
22 facts, and you also would need to probably - to restate
23 what I just did, that Sierra Leone is - Sierra Leonean
24 diamond mining is much more important than in Liberia.

10:12:34 25 Q. Now, you make reference, of course, to part of the
26 answer where he says 'accusing us of diamond trafficking is
27 like accusing Saudi Arabia of smuggling petroleum',
28 suggesting that Liberia - I don't know, what did that
29 suggest?

1 A. Well, I think that the classical British reference
2 would be to bringing coals to Newcastle. So it's bringing
3 something that is abundantly somewhere - so you wouldn't
4 have the need to bring, obviously, petroleum to Saudi
10:13:10 5 Arabia, nor diamonds to Liberia. That is the implication.
6 This is just - once again to contextualise Mr Taylor had
7 by then been elected for - had been President of Liberia
8 for three years for - as statement of fact. Monrovia was
9 still largely without electricity except for those who
10:13:28 10 could afford generators, and the country was still - in
11 terms of infrastructure and otherwise - in dire straits and
12 on top that, being cut off by the European Union at the
13 behest of Great Britain from development aid. So all that
14 was still coming in was humanitarian aid, and the
10:13:49 15 United States was putting pressure on the Security Council
16 so as to impose sanctions on Mr Taylor's regime. So there
17 was a ban on official travels, on the delivery of visa, and
18 the exportation of her exports of various items, such as
19 lumber and, obviously, diamonds."

10:14:08 20 Now, Mr Taylor, that's the full context of the evidence
21 given by Stephen Smith to this Court. Now, question number one:
22 Do you accept, as suggested by him, that the war in Sierra Leone
23 was all about diamonds?

24 A. I don't accept that. I don't.

10:14:35 25 Q. Are you suggesting, again as implied in that passage, that
26 British involvement in Sierra Leone was merely to protect their
27 interest in diamonds?

28 A. That's a statement of fact. I would believe not just
29 diamonds, but their general interests, yes.

1 Q. And by implication, thirdly, Mr Taylor, were you suggesting
2 to that journalist that, in effect, you had no interest in
3 diamonds, in Sierra Leonean diamonds, that is, because you had
4 enough diamonds of your own in Liberia?

10:15:19 5 A. That is correct.

6 Q. And so help us. If British interests extended beyond
7 diamonds, what other interests did they have in Sierra Leone?

8 A. Well, you have traditional ties. Britain - I mean Sierra
9 Leone is a part of the Commonwealth of Nations, but there are
10:15:46 10 also other natural resources in that West African sub-region.
11 For example, in Sierra Leone you also have gold, you have oil
12 that from our exploration, from our own assessment after I became
13 President, it showed that the area bordering Liberia on the Mano
14 River entering the Atlantic Ocean, that oil extends into that
10:16:13 15 border of Sierra Leone and I'm sure that the British should have
16 known this for a long time. So if I am not mistaken, I don't
17 know, it could be manganese or oil or some other - but there are
18 a lot of natural resource that you find between Guinea and
19 Liberia and Sierra Leone. And even those that are still
10:16:35 20 undiscovered.

21 So the interest in Sierra Leone would be diplomatic,
22 long-term association, ties. In fact, at one point, and I cannot
23 confirm this, but at one point our own analyst and intelligence
24 people came up with a story that at one point Tony Blair's
10:17:01 25 parents may have served briefly in Sierra Leone and Blair had
26 visited Sierra Leone as a young man. I don't have - this is just
27 through our analyst that is saying this.

28 So I mean normally the British, like the French, in dealing
29 with their old colonial countries maintain contact and a certain

1 amount of interest in those countries for political, diplomatic
2 and other economic reasons.

3 Q. Now, let's deal with another topic touched upon by this
4 witness during the course of his testimony. 22 September 2008,
10:17:40 5 page 16858 of the transcript:

6 "Q. I think you will find that Lome was in - the agreement
7 was in July of 1999, but didn't include the active
8 involvement of the AFRC element and so there were further
9 talks later that year and it was October when the two
10:18:04 10 leaders, Foday Sankoh and Johnny Paul Koroma, finally met
11 in Lome and were flown back on board a Nigerian government
12 plane?"

13 True or false?

14 A. That's totally false.

10:18:20 15 Q. Well, that's the question he was being asked. Did Foday
16 Sankoh and Johnny Paul Koroma meet in Lome?

17 A. They did not.

18 Q. Where did they meet, Mr Taylor?

19 A. They met in Monrovia, under my auspices in Monrovia.

10:18:37 20 Q. Well --

21 A. In September of 1999.

22 Q. Well, in case it is suggested that we are misrepresenting
23 the evidence, that question appears at line 4 to 6 of the
24 transcript, page 16858. It was in October, it was suggested to
10:18:57 25 the witness, when the two leaders, Foday Sankoh and Johnny Paul
26 Koroma, finally met in Lome. Now, the answer to the question
27 reads as follows:

28 "A. You're correct. I am referring to a process that was
29 a little bit halting and which we encompass as being the

1 Lome agreement, because it was precisely dragging out over
2 a period of time which is the second half of 1999. "

3 What's the problem, Mr Taylor?

4 A. I mean, this man has got it wrong. He's got it all wrong.

10:19:39

5 Even the question has got it all - he's got it all wrong. And
6 this accounts for the way that this information gets put out in
7 the public.

8 Foday Sankoh, following Lome in 1999, July, did not come
9 immediately. He went around, he visited Burkina Faso, he visited

10:20:04

10 Libya. We were on pins and needles. We brought Johnny Paul
11 Koroma to Monrovia in August of 1999, following the West Side
12 Boys situation at Okra Hills. Foday Sankoh finally arrived in
13 Liberia in September. And we have United Nations document that
14 we have exhibited here that prove otherwise what he is saying

10:20:30

15 here.

16 They come to Monrovia, we hold these discussions, they are
17 united and what happens? Obasanjo sent a presidential plane and
18 just on yesterday we dealt with a situation where I called the
19 Secretary-General of the United Nations, Kofi Annan. We
20 discussed the UN's involvement with this process.

10:20:50

21 Q. Can I interrupt you, Mr Taylor, because let's go on with
22 the transcript because finally the penny dropped with the
23 questioner, because he goes on to say this:

24 "Q. Yes, I thought I had made an error and I had. The two
25 leaders met in Monrovia and a more lasting commitment
26 involving both of these groups was drawn up to supplement
27 the Lome accord. Do you remember that?

10:21:09

28 A. Yes, I do.

29 Q. And Sam Bockarie would not agree to disarm and that was

1 why President Taylor agreed to have him and his troops come
2 to Liberia. Do you agree?

3 A. This is maybe a lopsided way of presenting it and in
4 more neutral language I would say - I would state the split
10:21:44 5 and the fact that the faction which still wanted to wage
6 war came to Liberia.

7 Q. But did not continue to wage war on Sierra Leone from
8 Liberia?

9 A. This is probably - no, I think that would be an
10:22:03 10 impugned statement by many analysts because precisely if
11 you still refer to the time line you would see that after
12 coming to Monrovia and after the split the peace process in
13 Sierra Leone did not go smoothly. Quite to the contrary."

14 Now, Mr Taylor, in what circumstances did Bockarie come to
10:22:33 15 Liberia?

16 A. Bockarie was resisting the instructions from his leader and
17 had not agreed to begin the disarmament process. And because
18 this was stalling the process, we decided to give him what we
19 call - we read the riot act to him that he either submit to the
10:22:58 20 process or he would be taken out of the process and he was
21 extracted from the process and brought to Liberia by ECOWAS.

22 Q. Now I want to deal with another suggestion made by this
23 man. On that same date, 22 September 2008, at page 16883 of the
24 transcript he said this. The questioner repeated - quoted from a
10:23:38 25 document which where relevant provided "and before taking on the
26 United Nations, the RUF (led by a former lieutenant of Taylor's,
27 Foday Sankoh)." "In what sense do you say that Foday Sankoh was
28 a former lieutenant of his", is the question.

29 "A. Foday Sankoh was part of those people who get trained

1 by Colonel Gaddafi in - prior to them heading uprisings in
2 their specific country, so Foday Sankoh is in a sense the
3 historical equivalent of what Mr Taylor was for Liberia.
4 Foday Sankoh was for Sierra Leone, but Foday Sankoh was
10:24:28 5 also part of or lived in Monrovia prior to going back to
6 Sierra Leone and he is presented here as being in a sense
7 also Mr Taylor's right-hand man, subordinate. We would
8 have to argue that in detail.

9 Q. Well, looking at the first part of your reply, he was
10:24:49 10 one of those - part of those people who got trained by
11 Colonel Gaddafi prior to them heading uprisings in their
12 specific country. Do you know anything of the places or
13 institutions that the Libyans provided for liberation
14 movements, revolutionaries from foreign countries?

10:25:09 15 A. Yes, I do. As this is part of a wider scheme, Colonel
16 Gaddafi set up in 1972 what is called the Islamic Legion.
17 That was specifically for the Muslim part of West Africa,
18 which is the Sahel zone, so that would apply to Touaregs
19 or, for example, the Darfur region, these people got
10:25:34 20 enrolled in the Islamic Legion..."

21 Let's pause there. Was Foday Sankoh your lieutenant,
22 Mr Taylor?

23 A. No, no. Never was. Could not have been.

24 Q. Did you at any time, whether in Libya or thereafter in
10:25:54 25 Burkina Faso or Liberia, have any kind of hierarchical position
26 in relation to him?

27 A. No, no.

28 Q. Were you at any time in a position to give him orders?

29 A. Not at all, no.

1 Q. Did you at any time dictate tactics or strategies to him?

2 A. No, if anybody needed tactics or strategy, I needed it.

3 Foday Sankoh was a career military personnel. I have never done

4 any military training in my life. So, I mean, how does a

10:26:36 5 non-military person give a military career man who was also

6 trained in Britain tactical or whatnot. This is total nonsense.

7 That's not true.

8 Q. As your alleged lieutenant, did Foday Sankoh ever provide

9 you with men?

10:26:53 10 A. Never.

11 Q. Now, we are told as part of the Prosecution case that

12 Mr Sankoh was a radio operator. Did he ever provide training in

13 communications to the NPFL?

14 A. No, no.

10:27:16 15 Q. To your knowledge, Mr Taylor, this suggestion made by the

16 witness that Sankoh lived in Monrovia prior to going back to

17 Sierra Leone, is that true or false?

18 A. When he says prior to going back to Sierra Leone I don't

19 know, because how could Foday Sankoh have lived in Monrovia?

10:27:40 20 Q. Well, I am asking you.

21 A. Where would he have lived? Foday Sankoh - we are fighting

22 a war with the Doe government. So where in Monrovia would this

23 man have been, and how would he have could come out of Monrovia

24 to come on the NPFL side? But you know, as I am looking at

10:27:58 25 Stephen Smith here, sometimes when people try to impress people

26 that they know so much, I see him mixing up - he's using words

27 like the Touaregs, he is associating the Darfur region, and all

28 these things and, you know, when you look - where are the

29 Touaregs from? These are people that are associated with parts

1 of West Africa in Mali. That's where you find the Touaregs. So
2 when you are talking about Darfur, you are talking about where?
3 Northern Africa, Sudan. So I don't know what he's trying to
4 impress anybody with. But it's this kind of confusion, Foday
10:28:36 5 Sankoh is in Monrovia before he goes to Sierra Leone. What does
6 that say? That's total nonsense.

7 Q. Well, let's just examine it in a little bit more detail,
8 Mr Taylor, so that we can test the credibility of that account.
9 At the time when Sankoh launches an incursion into Sierra Leone
10:28:59 10 in March 1991, which is not in dispute, did the NPFL control
11 Monrovia?

12 A. No, no. We are not in control of Monrovia.

13 Q. Did the NPFL, at any stage after the launch of your
14 revolution on 24 December '89, ever totally concur Monrovia?

10:29:24 15 A. Never. Never.

16 Q. So is it possible, Mr Taylor, for Mr Sankoh to have been in
17 Monrovia prior to the launch of his incursion in March 1991?

18 A. I don't see how that could have ever been possible. No. I
19 just have to say no.

10:29:53 20 Q. But on this same topic the questioner continued in this
21 vein at page 16885 of the transcript of the 22 September:

22 "Q. And the fact that Foday Sankoh may have been trained
23 in Libya at the same time that Charles Taylor was there
24 doesn't make him Charles Taylor's lieutenant, does it?

10:30:18 25 A. Had there been - no, it doesn't. It - had Mr Foday
26 Sankoh had no further acquaintance with Mr Taylor, this
27 would be entirely true. But he afterwards - once out of
28 the training facilities provided for by the Libyans, and
29 Liberia becoming the first country where a successful

1 rebellion was staged, he went to Liberia first before going
2 to his home country and getting engaged in his own
3 uprising.

10:30:54 4 Q. Yes. Foday Sankoh had the option of going to two
5 countries from which to invade Sierra Leone, didn't he?
6 Either Guinea or Liberia; they are the only two countries
7 that border Sierra Leone.

8 A. Yes, that is correct. As Guinea spreads other the
9 north of - yes, correct."

10:31:11 10 Now, Mr Taylor, was there any particular reason, as far as
11 you are aware, why Foday Sankoh launched his revolution from
12 Liberia?

13 A. The only reason I can come up with is that historically
14 Liberia had been a place where a lot of Sierra Leoneans came in
10:31:32 15 and went out. He had apparently, from what I have learned here
16 now and even subsequently, that he knew some of the Liberians
17 that were training at that particular time on the Liberian side
18 in the camps, and so for these two reasons - these would have
19 been two possible reasons why he would have wanted to try to
10:32:00 20 launch his revolution out of Liberia.

21 Q. Now, Mr Taylor, we need to look at this passage with some
22 care in light of the allegation being made by the Prosecution
23 here. Because you appreciate the allegation is you were a party
24 to a design arrived at in Libya and then executed from Liberian
10:32:30 25 soil with the invasion of Sierra Leone from Liberia. Do you
26 follow me?

27 A. I do.

28 Q. So do you appreciate in the question and answer I have just
29 referred to two things are being associated to arrive at a

1 conclusion: One, your knowledge of Sankoh in Libya?

2 A. That is correct.

3 Q. And your joint training there; and, two, the fact that the
4 Sierra Leonean revolution is launched from Liberia. Do you
10:32:59 5 follow me?

6 A. I do.

7 Q. Now, what do you say about that association and the
8 potential conclusion that that supports the suggestion of a
9 design arrived at between the two of you?

10:33:16 10 A. Okay. Let me answer that contextually. In the first
11 instance, I did not know Mr Foday Sankoh in Libya, number one.
12 Number two, when the Liberian contingent for training arrived in
13 Libya, the Sierra Leoneans were there. Now, I can see where this
14 particular witness is fluttering with trying to lock on to some
10:34:02 15 information that he is not an expert on, but there is one
16 important thing here that you can pick out from this. Stephen
17 Smith doesn't know what's happening in Libya because he doesn't
18 even, for example, mention Ali Kabbah, so right away you know he
19 doesn't know. And at the time of the training in Libya, where
10:34:28 20 the Liberians are trained, it was - I do not think it was with
21 the knowledge of some major intelligence agencies around the
22 world, because for the full period we are in Libya it doesn't
23 come out, and it would have come out that people were being
24 trained.

10:34:51 25 But now if we look at the prosecution's own theory that a
26 plan was supposed to be designed - which is not so. If you look
27 at even the documents that we went through in yesterday, don't
28 forget that this very design that the Prosecution is talking
29 about, a witness - their own witness on yesterday in testimony

1 said that this design was supposed to be hatched up in Burkina
2 Faso now. So that's - so you can begin to see that their whole
3 argument and this whole theory doesn't really hold. So when we
4 look at the fact that he doesn't mention the fact that it is Ali
10:35:29 5 Kabbah, he doesn't even know that the Sierra Leoneans are in
6 Libya long before the Liberians get there and had their own plans
7 for their own operation, the Liberians get there, do their
8 training and leave. So thus this whole thing has just got to be
9 Stephen Smith grabbing for straws here and there.

10:35:50 10 So in fact, in direct answer to your question, the whole
11 issue that there was a design in Libya is not true. The whole
12 issue that there was a plan to come and launch this revolution is
13 not true. I did not know Foday Sankoh in Libya. I knew Ali
14 Kabbah in Libya. We did not leave together. Foday Sankoh did
10:36:13 15 not, to the best of my knowledge, come to Burkina Faso. Because
16 if he had come for that period, I probably would have known him.
17 It did not happen based on the way he suggests it here.

18 Q. But, Mr Taylor, put in simple terms, the suggestion is
19 this: Mr Taylor, a bit of a coincidence that you just happened
10:36:35 20 to be in Libya, Foday Sankoh just happened to be in Libya, and
21 guess what? When he turns around to launch a revolution, guess
22 where he launches it from? Nowhere else but Libya - Liberia. Do
23 you follow me?

24 A. Yes, I do. Well, you know, there are a lot of things that
10:36:55 25 sometimes when these analyst put together, it makes - you know,
26 you can argue along that line, but that's not the fact. There
27 are a lot of things that people do not know, and they argue that
28 it's so factual, and they put the money on the line. We have so
29 many incidents in recent history that people are just so certain

1 that certain things were as they thought, and it never happened
2 that way.

3 I state categorically: I never knew or met Foday Sankoh in
4 Li bya. Never planned with him. Didn't know this man until 1991
10:37:35 5 on the security pact I was trying to work out to fight ULIMO in
6 Sierra Leone instead of having to fight them in Liberia. Never
7 knew him. I admit I knew Ali Kabbah, and even with Ali Kabbah
8 there was not any plan or design. I knew Dr Manneh. There was
9 no plan or design to do anything in Sierra Leone or a plan and
10:37:58 10 design with Manneh to do something in the Gambia. No.

11 Q. Were your men jointly trained with the Sierra Leoneans in
12 Li bya?

13 A. Not jointly. They were trained in the same camp, but not
14 jointly, no.

10:38:12 15 Q. Were your men jointly trained with the Gambians in Li bya?

16 A. No, the Gambians, to the best of my knowledge, did not
17 train in Li bya.

18 Q. Now, let's go on and deal with another aspect of this
19 witness's evidence, please. Page 16961 of the transcript,
10:38:49 20 question by Mr Bangura:

21 "Q. Just to be clear, when you said you knew about
22 Mr Taylor's involvement - that's in Sierra Leone - what
23 exactly did you know about his involvement?

24 A. I think I stated yesterday that it seemed to all of us
10:39:11 25 self-evident that there was a link between Mr Taylor's
26 movement in Liberia and the sort of offspring of this
27 fighting force in neighbouring Sierra Leone, given the
28 interconnectedness that we had already realised in the
29 field between Sierra Leonean fighters and Mr Taylor's

1 organisation."

2 Now, that's an answer loaded with meaning, Mr Taylor, so
3 let's try and unpack it, shall we. Now, was the RUF a sort of
4 offspring of the NPFL?

10:39:50 5 A. The RUF was not.

6 Q. As far as you are aware, Mr Taylor, was there a
7 self-evident link between the NPFL and that offspring?

8 A. No, but - no, counsel, there was no link. But we have
9 to - this Court has to understand. The language that Stephen
10:40:17 10 Smith is speaking here, counsel, is - this is not the language of
11 a journalist. This is the pure language of an intelligence
12 analyst. And I think that, you know, while going through this, I
13 do not know - you know, you people are the Defence lawyers. But
14 this man is speaking, it seemed - and this is all guess - you
10:40:47 15 know, like, intelligence analysis that is this man's real
16 background, it's not a pure science. It's not. So when - you
17 know, it's just like it seemed - and it was so apparent, and
18 there was a slam dunk for weapons of mass destruction to be in
19 Iraq. This is all analytical, and so we have to be very careful
10:41:11 20 how we deal with it.

21 So I don't know how you prove a negative. It seemed that
22 was going - just like the war in Sierra Leone is about diamonds;
23 the war in Congo is about coltan or cobalt or whatever they call
24 it. So these analytical things in most cases are not even - they
10:41:29 25 are not even intelligence; it's just information. So he is
26 analysing a situation. I don't see anything factual about what
27 someone is surmising, it seemed. There is just no true to all of
28 this. You know, this appearance - and people take it and lock it
29 into one corner and say: This is it.

1 So in dealing with this, there is no - the facts of the
2 matter, the evidence, don't support what he is talking about in
3 what he is trying to surmise here. He is just surmising. And so
4 I don't know how seriously we can take what Stephen Smith is
10:42:09 5 saying here, speaking here as an analyst.

6 Q. Well, he goes on to say in that answer that there was
7 interconnectedness in the field between Sierra Leonean fighters
8 and Mr Taylor's organisation. Now, help us. In that regard,
9 Mr Taylor, did you, for example, share radio frequencies with the
10:42:32 10 RUF?

11 A. No, we did not. We did not.

12 Q. Did you, for example, share arms dumps with the RUF?

13 A. No. There was no sharing of arms dumps, no.

14 Q. Were there combined lines of communication between you?

10:42:48 15 A. When you say combined, we could call - we could call on
16 certain frequencies that are available and they could call on
17 certain frequency that were available during our security
18 cooperation, yes.

19 Q. And was that a facility regularly used?

10:43:06 20 A. There was a - yes. There was a dedicated channel to that
21 prospect, yes.

22 Q. And for how long was that dedicated channel in operation?

23 A. From about August '91 to about the end of May 1992, during
24 that period. There were many frequencies that we had as the
10:43:34 25 NPFL. There were many frequencies that the RUF had. We did not
26 know or could not get into their frequencies. They could not get
27 into ours. There was a dedicated - and by "dedicated" I mean
28 there was one frequency set up for exchange of security
29 information. But the rest of the operation of the NPFL, the RUF

1 could not come into our channels, okay? And we could not get
2 into their channels. Only the dedicated line that was available
3 in terms of security cooperation, yes.

4 Q. Now, the questioner continued in this way quoting from a
10:44:17 5 report. The question reads as follows:

6 "Q. Now, if I just read the last two sentences in that
7 paragraph, 'The RUF was unknown to most Sierra Leoneans at
8 the time. Most believed it to be a front organisation for
9 Charles Taylor's National Patriotic Front of Liberia. It
10:44:41 10 was the start of a civil war which has destroyed Sierra
11 Leonean's development prospects and led to an almost total
12 dependence upon paid mercenary forces and foreign troops'.
13 Now, does this fit with the analysis you just gave in the
14 early part of the answer - in your earlier answer that you
10:45:05 15 gave to the Court?

16 A. I think we have gone through this detailed chronology
17 and I would like to see as one of the outcomes a balanced
18 view between what I think patent dependency of the
19 burgeoning civil war in Sierra Leone from the National
10:45:30 20 Patriotic Front of Liberia, Mr Taylor's organisation, and
21 at the same time the authentic credentials by Mr Foday
22 Sankoh fairly deeply rooted in the engrained history of
23 Sierra Leone where they were to go back to the argument
24 which we just had or the discussion we have just had about
10:45:50 25 the objective conditions for rebellion. I would see both.
26 I would definitely subscribe to the idea that the RUF
27 appeared as maybe a subsidiary rather than a front
28 organisation of Mr Taylor's movement. That is, I think,
29 factually solidly established."

1 What do you say about that, Mr Taylor?

2 A. Factually solidly established.

3 Q. That's what he says.

4 A. I would have to see where it was factually or solidly
10:46:27 5 established. You know, I think Ali Kabbah and others that were
6 involved in the Sierra Leonean movement should feel insulted,
7 because the fact of the matter is the Sierra Leoneans - in fact,
8 Sierra Leone started their problems long before - in terms of
9 experience, there were coup d'etats in Sierra Leone long before
10:46:54 10 there was any in Liberia. So to say somebody is trying to teach
11 - the very Foday Sankoh we are talking about was a part of a
12 process in Sierra Leone where there was an attempted coup d'etat
13 where he, Hinga Norman and all of them were arrested years ago.

14 Then let's go to the whole Fourah Bay College situation where Ali
10:47:18 15 Kabbah and all the students at Fourah Bay started their whole
16 pan-African movement, many years, put their act together, went to
17 Libya. Now, I met these people in Libya.

18 Q. Which people?

19 A. Ali Kabbah and his men in Libya, the Sierra Leonean
10:47:40 20 pan-African revolutionary movement in Libya before we got there.
21 It did not take Liberians or me to teach these people about what
22 they wanted to do. They were there.

23 Even, for example, if we did not have problems with Samuel
24 Doe, we would have never - there would have never been a problem
10:48:02 25 in Liberia. The Sierra Leoneans had planned the situation years
26 before we did. I didn't take Ali Kabbah and the Sierra Leoneans
27 to Libya. We met them there. Why were they in those camps
28 training? For a revolution. Ali Kabbah told me at the Mataba in
29 Libya that we had connections in the armed forces and the police

1 and that when they returned to Sierra Leone there would be this
2 uprising. So for him to say that this was supposed to be a
3 front, I think this insults them.

4 Q. Well, Mr Taylor, I think we need to be careful here because
10:48:40 5 I think the answer given by the witness is somewhat more nuanced
6 than that because what he is saying is this: "I would definitely
7 subscribe to the idea that the RUF appeared as maybe a subsidiary
8 rather than a front organisation." And he continues: "At the
9 same time, the authentic credentials by Mr Foday Sankoh fairly
10:49:05 10 deeply rooted in the engrained history of Sierra Leone."

11 So he is suggesting two themes there, and he goes on to
12 develop that latter theme in this way:

13 "... I think factually solidly established. And at the
14 same time, Mr Foday Sankoh had his very spiritual idea about what
10:49:31 15 popular resistance was and some of that mixture" - so he is
16 mixing the two ideas - "I led by the way to the specific form of
17 terror in Sierra Leone and I would like to stress that there were
18 other forms of terror in Liberia, shootings of civilians, people
19 getting terrorised, but the specific idiom in which terror was
10:49:56 20 expressed in Sierra Leone took the form of amputations, short
21 sleeves, long sleeves, so I see this as a mixture of outside
22 interference and manipulation and the conditions on the ground
23 for a popular uprising as being essentially the explanation for
24 the uprising in Sierra Leone."

10:50:17 25 Do you understand the point?

26 A. Uh-huh.

27 Q. What he is suggesting is there is something specifically
28 Sierra Leonean, but at the same time you had your hand in it at
29 the same time. Do you follow me?

1 A. That's total nonsense. I disagree. Total nonsense,
2 because you have to look at there were not these kinds of things
3 going on in Liberia, a totally different revolution. And in fact
4 in the case of Liberia, this Court has heard of trials and
10:50:48 5 executions in Liberia, which I do not deny. Those military
6 people that engaged in atrocities in Liberia were tried under the
7 uniform code of military justice and where the decision was
8 execution, military people were executed.

9 So we see a total difference. There was no impunity in
10:51:10 10 Liberia, so why the Prosecution came here lining out Cassius
11 Jacob and Sam Larto and all that, yes, we did. They knew that
12 they were doing something wrong, they violated the laws and they
13 were military people. There is not one civilian that was
14 executed by the NPFL. Not one. Military officers that
10:51:31 15 deliberately violate the rules set aside. So I disagree with
16 him. We had no hand in it. None.

17 Q. What about amputations, Mr Taylor? Was that a feature of
18 the war in Liberia?

19 A. Not one amputation that have been led in this Court or any
10:51:50 20 other witness has said that there were amputations in Liberia.
21 No. There are no amputees in Liberia. None.

22 Q. So to that extent do you accept that there were certain
23 specificities about the conflict in Sierra Leone as identified by
24 the witness?

10:52:08 25 A. Oh, I accept there were certain specificities in Sierra
26 Leone, yes.

27 Q. That's all I want to ask you about that witness, Mr Taylor.
28 We are going to move on to deal with another witness now. That
29 witness is TF1-367. Now, we are not going to mention any names

1 in respect of this witness, Mr Taylor, and you understand why,
2 don't you?

3 A. Yes, I do.

4 Q. So we need to proceed with care. Now, this witness says
10:53:21 5 that in 1990 - and I am looking at page 14084 of the transcript
6 of 20 August 2008 and he is describing events in Liberia:

7 "Q. Thank you, sir. You described the forces that
8 attacked Kakata as Charles Taylor's rebels. Did you ever
9 see Charles Taylor in Kakata?

10:53:52 10 A. Yes.

11 Q. Was that in the same year 1990 or a different time?

12 A. It was in the same year that I saw him there."

13 True or false, Mr Taylor?

14 A. Well, it depends now. It depends, you know, that - when we
10:54:12 15 spread the thing out in 1990, it very well could be that this
16 witness could have seen me in Kakata in 1990, but I would just
17 say if he had qualified it then I would be able to agree or
18 disagree, but I can say to the Court that I do come to Kakata
19 very late in 1990. Now, because he has painted with such a broad
10:54:51 20 brush, I don't know what to say. But maybe as we go on we may
21 know, but I do come to Kakata in late 1990.

22 Q. Well, let's continue with this passage of the witness's
23 testimony.

24 "Q. Can you describe for the Court what happened when you
10:55:07 25 saw Charles Taylor?

26 A. You know where I was, our house was located at the Bong
27 Mines park and across the street there is a police station.
28 So when he came from Gbarnga to Kakata, all of his men and
29 he himself all alighted right at that police station. We

1 did not go close to them, but where we were standing in
2 front of our house, we saw all what they did in the street.
3 So that was the time those of us who did not know him
4 before knew him, because fingers were pointed at him and
10:55:45 5 people were saying that this was the man. So that was the
6 first time I saw him in Kakata.

7 Q. You said he came with his men and alighted. Can you
8 just describe what it was you saw? What did he alight
9 from?

10:56:01 10 A. They were in vehicles. He was in a jeep and he had
11 gunmen behind him. There were plenty. Rebels were behind
12 him.

13 Q. Do you know which road he had come into Kakata from?

14 A. Yes, at that time he came from Gbarnga because by then
10:56:17 15 he was based in Gbarnga because by then the war had just
16 entered Monrovia and he was based in Gbarnga. He used to
17 come from Gbarnga."

18 Does that assist you to time it, Mr Taylor?

19 A. Yes. Then this witness is lying.

10:56:34 20 Q. Why?

21 A. Because I am not in Gbarnga. I do not live in Gbarnga
22 until 1991. Now, I have explained to this Court before, I have
23 even, if I am not mistaken, drawn on the map the route that we
24 took from - after we left Nimba we came in to Buchanan and then
10:56:59 25 Harbel and then we had cut off Gbarnga before people started
26 moving towards Gbarnga in late 1990.

27 But if he says here where I was in Gbarnga and came from
28 Gbarnga, that's a blatant lie. I do not move to Gbarnga until
29 1991 and he has got it all wrong here. All wrong.

1 Q. Well, he says quite clearly it was in the same year 1990,
2 you came from Gbarnga and he continues:

3 "Q. From Gbarnga entering Kakata where you were, do you
4 have to pass - at that time did you have to pass one of the
10:57:47 5 checkpoints you described?

6 A. Yes.

7 Q. Which checkpoint or checkpoints would that be?

8 A. I pass through two checkpoints. The first checkpoint
9 that I passed through was the one that was located by the
10:58:02 10 Bong Mines Highway close to the prisons. That is called
11 Katta Hight. And the second was on the main road going to
12 Gbarnga and that was the time Foday Sankoh went to collect
13 us to go. That was my second time that I passed through
14 those gates.

10:58:21 15 Q. Okay. Sorry, Mr Witness, perhaps my question wasn't
16 clear. You said Charles Taylor came from Gbarnga and you
17 saw him somewhere in Kakata. To get from Gbarnga to the
18 place you saw him, would Charles Taylor - was there a
19 checkpoint in between Gbarnga and the place you saw
10:58:40 20 Charles Taylor?

21 A. Yes, checkpoints were there. That is what I am talking
22 about. I said that was the second checkpoint that was on
23 the Gbarnga Highway close to Kakata."

24 So he is being quite clear about that, Mr Taylor. 1990,
10:58:59 25 you travelling from Gbarnga to Kakata, true or false?

26 A. Totally false. Totally, 100 per cent false. If he is
27 talking about 1991, yes. But not 1990. Not 1990. Because the
28 way we progressed to Monrovia - and that evidence is before this
29 Court - we did not come through Gbarnga to Monrovia. Nope. We

1 came through - and I have drawn it - Tappita; we came all the way
2 down to Buchanan; Harbel. I lived in Harbel before moving to
3 Gbarnga. In the year 1990, if we go according to the records
4 here, ECOMOG finally comes in August. By September or
10:59:48 5 thereabouts President Doe is captured. We are still - in fact,
6 there are still armed forces of Liberia personnel behind us going
7 to Gbarnga and Ganta. We captured those areas late in 1990,
8 okay? We surround Monrovia while the back of that side of the
9 country is still untouched. So he has got the year wrong.
11:00:15 10 Coming from Gbarnga to Monrovia had to be in '91. He is wrong,
11 100 per cent.
12 Q. Very well. He goes on to say this at page 14090 of the
13 transcript of the 20 August 2008:
14 "Q. Where is it that you met Foday Sankoh?
11:00:37 15 A. It was on a school compound that was called
16 St Augustine. St Augustine. That was the compound where
17 all of us, the Sierra Leoneans, went and met him and we
18 welcomed him there."
19 Pause. Do you know of a school called St Augustine,
11:00:53 20 Mr Taylor?
21 A. Yes, there was a Catholic school in Kakata called
22 St Augustine, yes.
23 Q. Were there Sierra Leoneans detained at that location?
24 A. I really don't know. At that particular time I don't know.
11:01:10 25 Q. "Q. What happened when Foday Sankoh arrived at the school?
26 A. He too welcomed us and he said thanks to us, because we
27 had wasted our precious times and we went there to wait for
28 him, so he said he appreciated our efforts. So he
29 explained to us how we will be able to join him so that we

1 will go over and liberate Sierra Leone, so some of us
2 accepted. And even though all of us accepted, yet some
3 people did not go.

11:01:51 4 Q. Mr Witness, you said that Foday Sankoh explained how
5 you would be able to join him so that he will be able to go
6 over and liberate Sierra Leone. Did he explain any details
7 about how he would be able to liberate Sierra Leone?

8 A. Yes.

9 Q. What did he say?

11:02:08 10 A. At first during the meeting he explained to us,
11 although he did not go into details, but he told us on the
12 surface. He said the war that Charles Taylor had brought
13 to Liberia was a similar war; that he had planned to enter
14 Sierra Leone. He said he came together with Charles Taylor
11:02:26 15 and that Charles Taylor was giving him full time support
16 for him to go and fight in Sierra Leone. So he said he we
17 should not be afraid of him for anything."

18 Pause. Now, you accept there was a St Augustine school in
19 Kakata, yes?

11:02:48 20 A. That is correct.

21 Q. You are unaware of Sierra Leoneans being detained there.

22 A. I am not aware of Sierra Leoneans being detained there.
23 There very well could have been, because we did detain Sierra
24 Leoneans in different positions. I am not aware of St Augustine.

11:03:08 25 Q. But help us with this. This witness is clearly suggesting
26 that Foday Sankoh was busy recruiting from among Sierra Leoneans
27 at that location. What do you know about that?

28 A. I have no knowledge of this recruitment or even Foday
29 Sankoh's presence there. It very well could have happened, but I

1 have no knowledge of it.

2 Q. Were you aware that Mr Sankoh was busy recruiting Sierra
3 Leoneans --

4 A. No, not at all.

11:03:42 5 Q. -- in Liberia?

6 A. I was not even aware that Foday Sankoh was in Liberia, not
7 even to talk about recruiting, no.

8 Q. Now, the witness is clearly suggesting, Mr Taylor, that
9 Foday Sankoh was speaking publicly of a link between him and you

11:04:06 10 and of you providing him - Sankoh, that is - with full-time
11 support. Were you aware of that?

12 A. No, I was not aware. I was not aware that he was saying
13 that, no.

14 Q. But let's just pause and consider that, Mr Taylor. If what
11:04:22 15 this witness is suggesting is correct, it means, then, that
16 Mr Sankoh was publicly using your name with suggestions that you
17 were providing him with support in order to recruit Sierra
18 Leoneans to go and fight in Sierra Leone. Now, how come that
19 didn't come to your attention?

11:04:45 20 A. Because it never happened as he is saying it. I don't
21 think it happened. Because there is no way that Foday Sankoh
22 could have been in Liberia speaking publicly using my name in
23 Kakata in 1990. No, I don't believe. If this happened, it had
24 to be something very hush-hush, but not in the public sense.

11:05:10 25 Because by this time in Kakata - it's a wonder. People, like
26 some of the journalists like the very Stephen Smith and other
27 people that have spoken before this Court - let's look at the
28 area we are talking about, Kakata, and the time we are talking
29 about. The NPFL is pushing toward Monrovia, and I keep bringing

1 this up because I want the Court to understand that there is no
2 such thing in Liberia at this time of journalists being barred
3 from coming into NPFL midst. We are - Kakata, your Honours, is
4 about a few - about 2 kilometres from Harbel.

11:06:00 5 Q. From where?

6 A. Harbel. Harbel runs right into Kakata. This particular
7 area of the country at this time, most of the expatriate
8 Americans are living in Harbel. There are journalists from all
9 over the world that are there. So if Foday Sankoh had been
10 publicly displaying this, number one, I would have heard about it
11 and he would have been picked up, or some of the journalists that
12 have been reporting in that area, taking pictures - in fact,
13 following the war there were several French, European
14 journalists. Someone would have said: Oh, but we - oh, I

11:06:47 15 remember. We met Foday Sankoh one time in X, Y or Z places. If
16 he was doing it there it had to be hush-hush and it did not get
17 to my attention, no.

18 Q. Now, the witness goes on to say that - and it reads as
19 follows, and we are looking at page 14094 of the transcript for
20 the 20 August 2008:

21 "Q. Who went to Katta Hight to have the prisoners
22 released?

23 A. He, Foday Sankoh himself, went to the prison.

24 Q. How do you know that?

11:07:50 25 A. His bodyguard Jarffer went there together with him. He
26 himself told me that they had gone and freed our brothers
27 from the prison.

28 Q. Thank you. By the way, these prisons were controlled
29 by who?

1 A. Those prisons, when Charles Taylor had captured Kakata,
2 he was in control of them. His men were there, but they
3 were under him."

4 Pause there. Now, do you appreciate the import of that,
11:08:26 5 Mr Taylor? What is being suggested by the witness is that Sankoh
6 was recruiting from prisons controlled by your men in Kakata.
7 Question: If that was going on, how come you didn't know about
8 it?

9 A. Because in the first place I doubt that it was going.
11:08:52 10 There is a place called Carter High.

11 Q. Is it a prison?

12 A. It is a prison, Carter High is a prison. And one
13 interesting thing is that there was no fighting in Kakata.
14 Kakata, not - there was no fighting in Kakata. In fact, Kakata
11:09:11 15 again is an area where you have a lot of expatriate businessmen.
16 There are a lot of - in fact one of the largest Lebanese
17 population is Liberia is in Kakata. There was no fighting. In
18 fact, I even remember the Special Forces that captured Kakata,
19 one of my Special Forces called William Sumo, who is alive and
11:09:33 20 well. There was no fighting.

21 And what happened in Kakata, from information that reached
22 me, because there was no fighting in Kakata, and that was a
23 regular prison, the NPFL commander in Kakata did not open the
24 prison to let the prisoners out because we permitted civilian
11:09:53 25 administration in Kakata to continue. So the people that were in
26 prison were not as a result of people that had been captured by
27 the NPFL, but the prison was not touched in Kakata. The business
28 houses in Kakata closed for that day and opened the next. There
29 was no fighting so to speak in Kakata. Kakata remained a normal

1 city. There was no fighting in Kakata.

2 So even this matter of, I don't doubt maybe that this
3 witness lived in Kakata of St Augustine. To the best of my
4 knowledge, no other witness before this Court also said that he
11:10:28 5 was one of those that were supposed to be commandeered at
6 St Augustine's Catholic school in Kakata. But the point I am
7 trying to make here is because Kakata there was no fighting and
8 it remained a normal business centre, along with the Bong mining
9 company, if Foday Sankoh had been in that area properly
11:10:54 10 recruiting and doing things it would have reached me in some way
11 because it was a regular city. There was no like looting in
12 Kakata. None of this kind of stuff, no.

13 Q. Was the prison under the control of the NPFL?

14 A. Well, yes, I can say yes because we took over, yes. Yes.

11:11:15 15 JUDGE SEBUTINDE: Mr Griffiths, could we have a spelling of
16 that prison?

17 THE WITNESS: Oh, actually it's - well, I think the
18 spelling here is Katta but it's the name Carter like C-A-R-T-E-R,
19 but here they spell it like K-A-T-T-A because they don't know how
11:11:40 20 to pronounce it. It's Carter High.

21 MR GRIFFITHS:

22 Q. And what is Carter High?

23 A. Carter High is the prison. The name of the prison, Carter
24 High.

11:11:51 25 Q. So spell both words for us. Is it two words?

26 A. Yes, two words. Carter High, H-I-G-H.

27 Q. Spell the first word for us?

28 A. C-A-R-T-E-R.

29 Q. Carter High?

1 A. Yes, but he doesn't know, he just says Katta like
2 K-A-T-T-A.

3 Q. Now, the witness continues:

4 "Q. Thank you. You said you were taken to Camp Naama.

11:12:19 5 Can you tell us what is Camp Naama or what was when you
6 arrived?

7 A. Camp Naama was a barracks, a military barracks, but it
8 had been converted into a training base.

9 Q. Can you describe the training base at Camp Naama in
11:12:37 10 1990?

11 A. Yes, Camp Naama is a barracks and it was divided into
12 two. On the one side were Charles Taylor's men and Foday
13 Sankoh's men were on the other side, but the field where we
14 used to go to undergo the training was on their side. So
11:12:53 15 when we were ready to go and undergo training, we will pass
16 through their own area before we go to the field. So
17 that's how the camp was structured."

18 Now, were you aware, Mr Taylor, that Foday Sankoh was
19 recruiting people and taking them to Camp Naama for training?

11:13:19 20 A. Not at all. Not at all.

21 Q. Were you aware of the existence of a training facility
22 called Camp Naama?

23 A. Oh, yes, I was aware.

24 Q. Where is it located?

11:13:35 25 A. Camp Naama is located in Bong County on the road going
26 towards Lofa on the Guinean border.

27 Q. What's the nearest town?

28 A. The nearest town to Naama I would say is Beliefanai. I
29 think that was spelt on yesterday on the map, Beliefanai. Yes, on

1 the map on yesterday.

2 Q. And were you aware of it being divided into two?

3 A. No, I was not aware. But what is Camp Naama? We have gone
4 through the evidence before. Camp Naama is the largest military
11:14:29 5 base in Liberia. Remember in my evidence I led here that on our
6 attempt to enter Liberia, there was a group that was led by a
7 Colonel Samuel Varney that had once commanded at that base and we
8 were acquainted, so we know Camp Naama. So the fact that Camp
9 Naama was a major military base that housed before the artillery
11:14:58 10 and the engineering battalions of the Armed Forces of Liberia.

11 So that's Camp Naama. So upon taking Camp Naama, Camp Naama
12 became one of many major military bases of the NPFL.

13 Q. Let's just pause for a moment, please, and I would like you
14 to move places for a minute, Mr Taylor, and if we could take up
11:15:27 15 this map. Now, could you indicate for us where Beliefanai is for
16 us, please?

17 A. Yes. This is, I will just circle it, is that okay?

18 Q. Well, just point - just indicate it for us, please,
19 Mr Taylor.

11:16:10 20 A. This is Beliefanai right here.

21 Q. Now, we see Gbarnga is just below that, yes?

22 A. That is correct.

23 Q. Just give us an idea, Mr Taylor, and it may be that the key
24 in the left corner of the map might assist us, how far is
11:16:40 25 Beliefanai from Gbarnga?

26 A. I would put it to about 20 miles.

27 Q. Well, if you use a measure and put it next to the key in
28 the bottom right-hand corner, 20 miles might be approximately
29 right.

1 A. Yes, about 20 miles.

2 Q. Now, Mr Taylor, when do you say you took up residence in
3 Gbarnga?

4 A. In 1991.

11:17:17 5 Q. When in 1991?

6 A. About July or thereabout in 1991.

7 Q. Now, Camp Naama can't be that far from Gbarnga, can it?

8 A. Well, when you - now, from Belefanai you have to move
9 towards your right going eastward toward the Guinean border. In

11:17:49 10 I would say another 10 - 8 to 10 miles, if you want me to point
11 the direction. You have to go in this direction. Naama is about
12 here.

13 Q. All right. Mark it, please. Now, Mr Taylor, that's all I
14 want you to do. Let's leave that on the overhead, please, and
11:18:20 15 could you return to your seat. Now, let's put all of what this
16 witness has said today together. Firstly, public recruiting of
17 Sierra Leoneans at St Augustine's school in Kakata, and you have
18 no knowledge of it, yes?

19 A. That is correct.

11:18:46 20 Q. Public recruiting of Sierra Leoneans from Carter High, you
21 have no knowledge of it?

22 A. No, I don't.

23 Q. Training at Camp Naama, not a million miles away from
24 Gbarnga, and you don't know anything about this?

11:19:05 25 A. No, no, no. Well, let's be specific about it. Training in
26 Naama, I know that the NPFL is training in Naama.

27 Q. All right. Let me be more specific. Sankoh training
28 Sierra Leoneans in Naama and you tell us you know nothing about
29 it, yes?

1 A. I know nothing about Sierra Leonean and Sankoh training,
2 that's correct.

3 Q. Well, help us, Mr Taylor, how is all of this happening
4 within territory controlled by the NPFL and you're totally
11:19:37 5 ignorant of it all?

6 A. Well, it's very simple. 1990, I am still living in
7 Buchanan. I am still living in 1990 in Buchanan. Don't let's
8 forget, the speed that we moved toward Monrovia and Harbel, we
9 are in that general area by about August of 1990. That is still
11:20:11 10 considered a very dangerous zone. I am living in Buchanan. I
11 will drive from Buchanan, I will drive up to Harbel, okay, I will
12 return to Buchanan. I move from Buchanan into Harbel I would say
13 in the late part of 1990, before I move into Harbel, okay.

14 So the rest of the country behind me, ahead of me, I really
11:20:42 15 do not - and no leader of any warring party or any revolution at
16 this time would know the precise details of what is happening in
17 the entire country. The NPFL by this time in 1990, from evidence
18 before the Court, has practically taken over the whole country.
19 It is only the city of Monrovia. On the northwestern side is the
11:21:10 20 Sierra Leonean border, we are there. Remember Secretary Cohen
21 asked us to keep that road open. We are in that particular area.

22 So the leader now of the NPFL is not everywhere and it's
23 impossible for me to know. I know that there are training bases,
24 I know that they have to train. It's a part of the orders to
11:21:32 25 train because we are fighting a war. I do not know even
26 quantities of people. We have established some 10, 15 bases by
27 this time, okay. There is training still going on in Gborplay,
28 in Tappita, training is going on in the place called LAC, that's
29 L-A-C, the Liberia Agriculture Company near Buchanan. Training

1 is going on in Buchanan.

2 By late 1990, when the troops moved backward towards
3 Gbarnga, and I have demonstrated this on the map before, okay,
4 they begin to move. It is normal to set up training. You
11:22:08 5 capture a military base, all of the heavy artillery almost of the
6 Armed Forces of Liberia are located at Camp Naama. So in fact it
7 is the late capture of Naama, okay, in late 1990 that really gave
8 us access for the first time to heavy artillery like 105
9 Howitzers and different things that are stationed at that base.

11:22:30 10 So the fact of the matter is I am aware, very aware, of
11 training bases. But I do not know who is training there, except
12 the general order to train for combat. So of course, I mean, if
13 there are Liberians training there, there are Sierra Leoneans
14 training there, I was aware that several West African groups - I
11:22:52 15 mean individuals had joined us. I was aware that there were West
16 Africans along. Nigerians. There were Ivorians that joined us.
17 So it would not be specific to me for me to say - you know, for
18 somebody to come and say, especially from my understanding of
19 this now, that it was a secret operation that they were carrying
11:23:13 20 out. I would not have known. I would not have known.

21 Q. Now when you say other West Africans were joining us, what
22 do you mean?

23 A. There were Ivorians. Ivorians fought alongside with us,
24 okay. There were a couple of Ghanaians that fought alongside
11:23:32 25 with us. And we got to know that from the Harbel area they were
26 beginning to recruit other individuals that just wanted to join.
27 There were a few Nigerians we understand that were living in
28 Liberia that just joined the revolution. But I did not know them
29 specifically.

1 Q. And were these individuals trained by the NPFL?

2 A. Oh, yes, the Ivorians were trained by us, yes.

3 Q. So was it a matter of note that, for example, Sierra
4 Leoneans were being trained at Camp Naama? Was it a significant
11:24:06 5 matter that would necessarily be brought to your attention?

6 A. Not necessarily, no. No, there was nothing unique about
7 West Africans that had joined the NPFL. There was nothing unique
8 about that, no.

9 Q. But nonetheless, Mr Taylor, the witness continues in this
11:24:22 10 way:

11 "Q. Just so the record is absolutely clear, when you say
12 the training was on their side and that we will pass
13 through their own area, who is the people you are talking
14 about as their own side and their own area?

11:24:38 15 A. NPFL, Charles Taylor's men. We will pass through
16 their own."

17 And then there was an intervention by Justice Sebutinde
18 which needn't trouble us, but then there is this question:

19 "Q. Sir, when you talked about the trainers, you talked
11:25:00 20 about Sierra Leoneans and you named three, like
21 Mohamed Tarawalli, and then you talked about the Liberian
22 side. These people on the Liberian side you named, CO
23 Isaac and PI, who did they train? You said the camp was
24 divided in two. Did they train on the NPFL side or on the
11:25:23 25 Foday Sankoh side?

26 A. These Liberian trainers I am telling you about, they
27 had already trained under the NPFL under Charles Taylor's
28 men. So they were the ones who Foday Sankoh went and took
29 to come and train us also. So they were the ones who

1 trained us, the Sierra Leoneans backed by Rashid Mansaray,
2 Mohamed Tarawali, because they were trained in Libya."

3 Now, pause there. Now, Rashid Mansaray and
4 Mohamed Tarawali trained in Libya. Did you know them?

11:26:04 5 A. Never met them. Never knew them in my life, no.

6 Q. Were you aware that there were Sierra Leonean Special
7 Forces in Liberia?

8 A. No, I was not aware. If I had been aware I probably would
9 have used them myself - but I was not aware - to protect me.

11:26:23 10 Q. Did you know someone called CO Isaac?

11 A. No, I did not know him. I saw the gentleman here and we
12 will talk about him later, but I never knew this man.

13 Q. Did you know someone called PI?

14 A. No, I didn't know PI.

11:26:42 15 Q. But let's add another layer then, Mr Taylor, to this level
16 of unawareness. Unaware of recruitment at St Augustine?

17 A. Yes.

18 Q. Unaware of recruitment at the prison?

19 A. Yes.

11:26:58 20 Q. Unaware of presence at Camp Naama. Help me --

21 A. Well, not aware of presence at Camp Naama.

22 Q. Presence of Sierra Leoneans at Camp Naama?

23 A. Yes.

24 Q. Now, help us. Who was in charge of Camp Naama?

11:27:15 25 A. Oh, I don't - the only person that could have been in
26 charge, and I can't be specific about this, but I am more than
27 sure, the commander in that zone at that time is Anthony
28 Mekunagbe. So I would say that he would be in charge of the
29 training facilities. But as to the specific command on the base,

1 I don't know who was in command.

2 Q. But in any event, one would expect you to be in regular
3 contact with Anthony Mekunagbe?

4 A. No.

11:27:51 5 Q. Why not?

6 A. It is not in my job as commander in chief to be in touch
7 with my field commanders there, no. There was a chain of command
8 in the NPFL. There was a chain of command. The general

9 commander was General Isaac Musa. We have a Defence Minister who
11:28:08 10 is Tom Womeiyu. No, no, no, I would not get in the field to call
11 my commanders, no. If I wanted specific information about what
12 was happening in the field, then my Defence Minister - Tom
13 Womeiyu was Defence Minister and spokesman. If I didn't know the
14 next person that I would find out from would be the general

11:28:27 15 commanding all forces, General Isaac Musa. I would not call
16 Mekanagbe, no.

17 Q. But are you telling us, Mr Taylor, that it didn't just crop
18 up in conversation at some stage with one of your generals who
19 had responsibility for this area, "Oh, guess what? There is this
11:28:44 20 chap called Foday Sankoh training some men here, chief. I
21 thought I would just bring it to your attention"?

22 A. No.

23 Q. You are saying that never happened?

24 A. Never happened. In fact, Tom Womeiyu would have stopped
11:28:56 25 it. Tom - in fact, before it even got to me, the Defence
26 Minister Tom Womeiyu would have stopped it.

27 PRESIDING JUDGE: We are fast approaching the end of the
28 tape, Mr Griffiths.

29 MR GRIFFITHS: That's as good a time as any, Mr President.

1 PRESIDING JUDGE: We will adjourn now for the morning break
2 and reconvene at 12 o'clock.

3 [Break taken at 11.30.]

4 [Upon resuming at 12.00 p.m.]

12:00:54 5 MR GRIFFITHS: May it please your Honour:

6 Q. Mr Taylor, we're still with witness TF1-367, yes?

7 A. Yes.

8 Q. And we had just mentioned training at Camp Naama before we
9 adjourned.

12:01:09 10 A. That is correct.

11 Q. Now, the witness continued. Page 14098 of the transcript,
12 line 18.

13 "Q. But, sir, you said someone decided to wage war on
14 Sierra Leone. Who did you mean decided to wage war on
15 Sierra Leone?"

12:01:35

16 A. Foday Sankoh.

17 Q. Did Foday Sankoh ever talk to the troops that you with
18 in Camp Naama?

19 A. Yes.

12:01:55

20 Q. Did he explain how he was going to wage this war on
21 Sierra Leone?

22 A. Yes.

23 Q. How did he say he was going to fight the government in
24 Sierra Leone?

12:02:03

25 A. He said he would enter Sierra Leone from two fronts,
26 one in the Kailahun District and, two, in Pujehun District,
27 and the war that he waged in Sierra Leone would be
28 supported by Charles Taylor fully.

29 Q. Did Foday Sankoh ever explain where he would get the

1 weapons and ammunition to give you soldiers?

2 A. That's what I've said, that it was Charles Taylor whom
3 he said, because we did not know any other person except
4 Charles Taylor with whom he was. He said he would support
12:02:36 5 fully, and we, too, who were at the training base used to
6 see it. The food we ate, whatever we used at the base was
7 coming from Charles Taylor."

8 Now, pause there, Mr Taylor.

9 A. Yes.

12:02:51 10 Q. Now, help us. Who did decide to wage war on Sierra Leone?

11 A. Who did? It had to be Foday Sankoh, not Charles Taylor.

12 Q. Did you order Foday Sankoh or any member of the RUF to
13 invade Sierra Leone?

14 A. Never did, no. Never did.

12:03:20 15 Q. Help us. The decision to enter Sierra Leone "from two
16 fronts", whose decision was that?

17 A. What he is saying here, it's Foday Sankoh's decision.

18 Q. Did you have anything to do with that?

19 A. Nothing to do with that, no.

12:03:37 20 Q. And he goes on. That, effectively, all supplies to make
21 that possible came from you. Did it?

22 A. It did not come from me.

23 Q. So help us, Mr Taylor, where did Foday Sankoh get the
24 wherewithal from to launch that invasion?

12:03:56 25 A. I'm sure he got it - from what is being said here, he got
26 it from inside Liberia, but not from me.

27 Q. Let me put it differently. Do you have any direct
28 knowledge as to where he got such supplies from?

29 A. No, I don't. No, I don't.

1 Q. Did you directly order that arms and ammunition, food or
2 any other such supplies be provided to the RUF to make that
3 invasion possible?

4 A. No, I did not.

12:04:40 5 Q. Did you make available medical supplies, by way of example,
6 to make that invasion possible?

7 A. No, I did not. I did not.

8 Q. So when this witness says, "That's what I have said, that
9 it was Charles Taylor whom he said - because we did not know any
10 other person except Charles Taylor with whom he was," now, help
11 us - I appreciate that's based on an assumption, but help us, did
12 you provide any of that, Mr Taylor?

13 A. I did not provide any of this. And probably I think,
14 counsel, maybe your suggestion we should maybe put this in
15 context of what this witness is talking about and the way how
16 people talk generally. There are several important points.

17 Number 1: Camp Naama, in previous readings here, it is said that
18 people are being trained at two different sites of Camp Naama.
19 Now, my first question will be: Why would people train at two
20 different sites when there's a general training at Camp Naama?

12:06:03 21 My first assumption - I would say even more than an assumption,
22 would be, there is somebody clandestine about what is going on.

23 The names that are mentioned, Mongor and PI, as I saw
24 Mongor sit here, God knows that I would have never sent Mongor -
12:06:26 25 if I was involved in any training or helping to train for an
26 invasion, it would not be Mongor. The list of Special Forces
27 that have appeared before this Court don't contain any Mongor and
28 there's no PI on that list. So, logically, if I'm involved in
29 helping Foday Sankoh, I would definitely, definitely send people

1 that are at the calibre of people that he is supposed to be using
2 - I mean, that he is using as trainers. And I'm speaking about
3 Mohamed Tarawalli or, what they call the other boy, Rashid that
4 we talked about.

12:07:04 5 Now, having said that, let's look at another point where
6 there's a training going on at Naama. Anthony Mekunagbe is in
7 that particular area, but we will get into the story of Mekunagbe
8 as we get a little further and into what Mekunagbe got into that
9 caused him to eventually get executed. There's a whole story
12:07:29 10 with Mekunagbe there, so I can see why Mekunagbe and some of the
11 co-hosts that have been named, okay, I can see why they would be
12 involved in such clandestine things. Whom am I talking about?
13 We're talking about the Mekunagbes of this world and we're
14 talking about the Oliver Varneys. And we know from evidence here
12:07:50 15 that they got executed because of their covert actions, but I'm
16 sure that we'll get into that.

17 So, look, there is food. We are training men across the
18 country, and the Court knows and we've done this. Again, I keep
19 repeating this. It's on the map. As the leader of the NPFL, my
12:08:07 20 duty is to provide the necessary arms, ammunition, food and
21 support to my fighters. I'm seated in Buchanan. I've got a
22 Defence Minister. I've got generals in the field. We have
23 captured by this time almost the entire country. There is no way
24 I'm around this country. So is food going to Naama? Yes, food
12:08:35 25 is going to our training base.

26 Now, from what I can see, they are getting some. In his
27 mind, "Oh, it's coming from Charles Taylor." I don't know who is
28 getting the food. When I gave ammunition to that section of the
29 country to the commander, to General Musa, who would divide

1 ammunition, all I know is that ammunition is going to my soldiers
2 to carry on their task. So, really, to tell you the truth, I'm
3 not in a position here to say whether they gave them some of the
4 food or didn't give them. I really - I, Charles Ghankay Taylor,
12:09:11 5 never authorised any food or weapons or whatever they say - "Take
6 this to Foday Sankoh for his men." Never did. And, I mean, it's
7 just - it's out of this world to believe that there is something
8 going on.

9 All I can put my hand on here is this: That this secret
12:09:32 10 operation that was being conducted by Mekunagbe and his people,
11 that eventually got them executed, is the real basis of this
12 whole RUF thing and this Foday Sankoh. I knew nothing about it.
13 Tom Womeiyu, who is as educated as I am, who wrote the first
14 letter that has been shown to this Court, who has been meeting
12:09:56 15 with State Department people, we have been talking, we've been
16 trying to portray to the world what this revolution is all about.
17 If even he had known about this, even before it got to me, he
18 would have told me or he would have stopped it.

19 I did not know that there was a Foday Sankoh in Liberia and
12:10:14 20 Naama training for an invasion in Sierra Leone. I did not know.
21 I'm still in Buchanan at this time. I move as leader to move in
22 the jungle - if you look at Liberia, it's all green. Before I
23 move from one area to another, it's well planned before I even
24 move. I'm not just running up and down like I'm some - I'm not a
12:10:40 25 military person. I've never had military training in my life. I
26 depend on the military people to protect me. That's why I called
27 in Gambian Special Forces and others because I need protection.
28 So I'm not running all around the country. I have an organised
29 set up. That information did not reach to me. And I can almost

1 say it did not get to my Defence Minister, because if it had
2 gotten to him, he would have told me.

3 General Musa, Isaac Musa, would have stopped it; the late
4 Isaac Musa. So that's all I can say about this.

12:11:14 5 Q. Well, Mr Taylor, let's just deal with that in a bit more
6 detail. You've heard evidence in this Court that, for example,
7 there was a trade in looted items over that border between
8 Liberia and Sierra Leone involving NPFL fighters.

9 A. Yes.

12:11:37 10 Q. And how on one occasion, because of a failure to produce
11 the agreed consideration, a raid took place across the border.
12 You've heard all of that evidence in this Court.

13 A. Yes.

14 Q. Now, Mr Taylor, you are suggesting, in effect, that some of
12:11:58 15 your senior generals, to borrow a phrase, connived with
16 Foday Sankoh. That's what you're saying isn't it?

17 A. That is all I can put it to.

18 Q. Well, help me, Mr Taylor. What was in it for them?

19 A. Well, I can tell you. Mekunagbe and Oliver Varney, that
12:12:18 20 have been mentioned here, in the training camp in Libya - I think
21 to an extent one of the Prosecution witnesses dealt with this, if
22 I'm not mistaken, Moses Blah dealt with this to an extent. There
23 was a plan in Libya in the camps to use me to launch the
24 revolution, and because most of the guys were from Nimba, they
12:12:46 25 would eventually assassinate me and take over the command. Most
26 of the men involved in that were arrested while they were in the
27 camp in Libya, including Mekunagbe and Oliver Varney. They were
28 arrested in Libya, and Cooper Miller.

29 We, eventually, after a long time - in fact, the first

1 commander of NPFL forces was not General Musa. It was Corporal
2 Miller who had planned to kill me. They wanted to use me because
3 I "had the contact to arrange everything", get on the ground.
4 When they get organised, they would kill me.

12:13:31 5 Also involved in that plan is a name that has come before
6 this Court called Yegbeh Degbon that has come before this Court.
7 What was in there for them is to kill me and take over the
8 revolution because almost 90 per cent of the Special Forces were
9 all from Nimba. This is why who was involved but was eventually
12:13:54 10 acquitted from that? The very Prince Johnson. So when Prince
11 Johnson broke away and formed the INPFL this is when it
12 frightened me and right away I rushed to Burkina Faso and asked
13 the Gambians - asked Dr Manneh to let the Gambians come.

14 So what was in it for them? They wanted me destroyed and
12:14:17 15 they pursued that plan later and they were all arrested and tried
16 and the three of them were executed.

17 Q. Yes, Mr Taylor. That's all well and good, but my question
18 is different. What you've just told this Court might well
19 account for Prince Johnson's actions or for activities in
12:14:42 20 Liberia, but why would conniving with Foday Sankoh to invade
21 Sierra Leone - how does that fit into the scenario you've just
22 described? Do you follow me?

23 A. Yes, it gave them the beachhead in Sierra Leone that if and
24 when they failed they would have something to fall back on. That
12:15:01 25 was the whole plan, okay. And that plan was not revealed - it
26 was revealed subsequently with the group calling itself Black
27 Kadaffa, okay. The plan was to use the Sierra Leonean situation
28 and in event that they failed in my situation they would have a
29 fallback place to go to. This was the plan that they made.

1 Q. Let's move on to another aspect of this witness's evidence.

2 Page 14104 of the transcript of 20 August 2008:

3 "Q. At that time did Charles Taylor stay in that mansion
4 or did he stay somewhere else?

12:16:08 5 A. Later when the NPFL captured Monrovia he used to go
6 there but it was at Kakata where he was first based, that
7 was where he stayed. That was where he was staying.

8 Q. You said that your position was the ground commander.
9 Can you please clarify it for us, you were in charge of
12:16:28 10 everything at what ground, what was the place that you were
11 commanding or responsible for?

12 A. Sankoh's own ground. Sankoh's own. Because I can say
13 it was a mansion. Because where they were they used to
14 call their mansion.

12:16:45 15 Q. At that time when you were with at times Sankoh in
16 Gbarnga you said Foday Sankoh would travel. Would you ever
17 travel with him?

18 A. Yes.

19 Q. Was that sometimes or most of the time or all of the
12:17:00 20 time that you would travel with Foday Sankoh.

21 A. No, it was not at all times. Once in a while I will go
22 with him to Sierra Leone and we will return.

23 Q. When Foday Sankoh went to Sierra Leone do you know if
24 he ever brought anything with him.

12:17:16 25 A. Yes.

26 Q. What would he bring?

27 A. Whenever he goes and spends two weeks or so, when he
28 returns to Liberia and Gbarnga, when he was returning he
29 will take along condiments. He will take along supplies of

1 arms and ammunition, food and other little things.

2 Q. Okay. Sir, can you clarify when you said he would take
3 along supplies of arms, ammunition, food and other things,
4 he would take those from where to where?

12:17:46 5 A. Those things that he used to take along, he was not
6 taking them from a different country. He used to take them
7 from Liberia. It was Charles Taylor who gave him
8 everything because whatever we had to take to Sierra Leone
9 it was Charles Taylor who gave us. If we did not give
12:18:03 10 them - if he did not give them we did not get them from any
11 other source that I know of."

12 What's your position on that?

13 A. Well, in the first place the NPFL never captured Monrovia
14 as the witness says here. The NPFL never captured Monrovia. And
12:18:25 15 then again sometimes you wonder about what these boys are talking
16 about. Then he cannot - I don't know what period he is referring
17 to here.

18 But when he talks about the mansion, then he has got to be
19 talking about 1991. He can't still be - I hope not - I hope he
12:18:43 20 is not talking about 1990. Because he talks about a mansion.
21 The mansion that he is talking about - I never stayed in Kakata
22 at all. So the mansion he is talking about is Gbarnga and that's
23 got to be middle of 1991 and Foday Sankoh comes to Gbarnga on my
24 invitation about August of 1991 and I did say we do give him a
12:19:09 25 guesthouse on the security whatnot and he does - I don't know
26 who. He does have people at that guesthouse and that's the only
27 place that - so he's got - he can't be talking about 1990 and he
28 can't be serious that I captured Monrovia. So he has got it all
29 wrong. So maybe there's - I can't correct his statement, but he

1 is wrong. 100 per cent wrong.

2 I never captured Monrovia and the guesthouse was given to
3 Foday Sankoh in 1991 after our meeting in August of 1991. He did
4 leave some boys at the place. I didn't know them. They were not
12:19:49 5 what [indiscernible] - but he did - it was a guesthouse assigned
6 to him. So unless he is talking about 1991 and unless he agrees
7 that he is mistaken about the capture of Monrovia I have to
8 disagree with him.

9 Q. Now, Mr Taylor, just dealing with some more details on
12:20:06 10 that?

11 A. Yes.

12 Q. The guesthouse which you provided to Foday Sankoh in
13 Gbarnga?

14 A. Yes.

12:20:13 15 Q. For how long did he have use of that facility?

16 A. From about August/September of 1991 until the end of our
17 relationship in May of 1992.

18 Q. And did Foday Sankoh provide his own security at those
19 premises or was security provided at the premises by the NPFL?

12:20:39 20 A. Oh, I would say a combination of the two. Whenever he came
21 he brought security along with him. In fact, the house - inside
22 of the house he had his own boys, had he a few boys there - from
23 our information that reached me - that did his cleaning and what.
24 The outside Gbarnga - I'm now in Gbarnga so there is general
12:21:02 25 security. But his house was kept by a few boys that he had there
26 from Sierra Leone.

27 Q. And you accept that you provided him with assistance during
28 the period you've outlined?

29 A. Oh, definitely. Definitely.

1 Q. And what was the extent of that assistance, Mr Taylor?

2 A. It was not - it was not very much. Because we - we didn't
3 have anything really. The material that we are fighting with
4 around this time is mostly material captured from the Armed
12:21:39 5 Forces of Liberia. We are not getting any real serious help yet
6 because in fact even movement for me is very, very, very, very
7 controlled. And what do I mean by that? We managed to be
8 present at - remember there's a meeting late 1990 in the Banjul
9 The Gambia. We begin a process. So I'm not going in and out of
12:22:10 10 Liberia like that.

11 So all we have is very small, so whatever we have we tried
12 to share with him and it's not a lot. Maybe a few boxes of
13 ammunition here and there. But very, very little. In fact, he
14 complained about it so many times but I couldn't really help him
12:22:26 15 beyond that.

16 Q. Who complained?

17 A. Foday Sankoh complained.

18 Q. About what?

19 A. About the quantity of things that he was getting, that it
12:22:33 20 was insufficient. But I didn't have it. I didn't have the
21 material in sufficient amounts that he wanted so I just couldn't
22 help.

23 Q. And how frequent were these complaints?

24 A. Oh, he complained several times. Let's say between that -
12:22:55 25 within that period I would say in terms of complaints I would say
26 at least a half dozen times he would say, you know, we need this
27 and we need that. I would say, "Well, look here, I don't have
28 it." In fact, my whole purpose really was to keep my unit that
29 we had in that area equipped that they could hold ULIMO off, but

1 that he couldn't get the quantity of supplies that he wanted.

2 Q. Now, the witness continues. Page 14105 of the transcript
3 of 20 August:

4 "Q. What did Foday Sankoh do with the arms, ammunition,
12:23:47 5 food and other things that he took with him?

6 A. He used to take them to Sierra Leone. When he goes he
7 will give them to his deputy who was Rashid Mansaray and
8 Mohamed Tarawalli. He would call them and give them to
9 these people and they would give them over to the fighters.

10 Q. When Foday Sankoh was in Gbarnga did he have any means
11 to communicate with RUF forces in Sierra Leone?

12 A. Yes.

13 Q. How would he do that?

14 A. At first because he hadn't communication at our mansion
12:24:25 15 ground - we didn't have communication there. But he used
16 to go to Charles Taylor because there was just a street
17 between us, so he used to go there to communicate to
18 Sierra Leone."

19 Let's pause. How close was the guesthouse you mentioned
12:24:44 20 providing to Foday Sankoh to your mansion ground?

21 A. It was a little distance. I would say several - several
22 city blocks away. We were not in the same location at all.

23 Q. This witness is saying, Mr Taylor, there was just a street
24 between them?

12:25:04 25 A. That's a lie. That's not true. That's not true. And the
26 reason why he knows that he's lying, where I lived in Gbarnga and
27 of the witnesses and the people that will come here will tell
28 you, there were no - no individuals except my security personnel
29 were permitted within that area. Even we encouraged the

1 civilians that had houses to leave. We rented some of the
2 houses, the [indiscernible] places. There were no one - because
3 the protection - the way how security is set up in these
4 guerrilla situations, the security is not mostly where the person
12:25:46 5 is sitting. It is within the environs. That's where you set up
6 the security. There were no other person living within one or
7 two blocks of that place except the entire Executive Mansion
8 Guard battalion occupied the houses in the area. That's not
9 true. Now, there's no need for me to mislead anybody about this.

12:26:08 10 I say Foday Sankoh was in Gbarnga. He had a house. It was
11 several blocks away from my place. He's wrong about this.

12 Q. Now, what about the other aspect of this: "At first they
13 didn't have any communication so they had to go to the mansion
14 ground" - that is your mansion ground - "to communicate with the
12:26:29 15 RUF." True or false?

16 A. Well, that's possible, I would agree. And this mansion
17 ground that he is talking about, there were several buildings.
18 There was the communication - the communication outfit for the
19 NPFL in Gbarnga is not situated in my office. So where he makes
12:26:48 20 it sound here the mansion ground, there are several buildings
21 that constitute the facilities. I'm in what we called then the
22 mansion. There's a separate building that is housing the
23 communication for the NPFL where there are several radios. So it
24 is highly probable that he could have gone there to make a call.

12:27:09 25 I would agree.

26 Q. Very well:

27 "Q. Was there some communication equipment at Charles
28 Taylor's mansion ground?

29 A. Yes.

1 Q. What kind of equipment?

2 A. There was a communication there that looked like a
3 radio. They used to put - they would put it on a table
4 like this. That was what they used to talk. It's not the
12:27:32 5 one that had those big poles.

6 Q. Where exactly was this radio?

7 A. The radio was at the mansion, in Charles Taylor's
8 mansion itself in a room".

9 What do you say about that, Mr Taylor?

12:27:48 10 A. That is not true. That is not true.

11 Q. "That was where it was. It was not outside. It was in the
12 mansion like this house where we are now." What do you say about
13 that?

14 A. So then he is saying that when Foday Sankoh went to me he
12:28:10 15 was present? No, there was no - the communication equipment was
16 in a separate building. Not inside my building, no.

17 Q. "... It was not outside. It was in the mansion like this
18 house where we are now. It was in one part of that house
19 that the operation room was. So when he wanted to speak,
12:28:36 20 that's where he went.

21 Q. How do you know that, that Foday Sankoh would use the
22 radio in Charles Taylor's mansion to communicate with the
23 troops in Sierra Leone?

24 A. Charles Taylor - let me say Sankoh, yes, of course, he
12:28:56 25 was a rebel leader. He was fearful. But those of us who
26 were with him, he was not fearful to us because he was our
27 boss. Some of the things that he did he used to tell us.
28 He used to say it for us to hear. Not everybody but those
29 of us who were with him, he will say it and we will hear.

1 When he would have spoken to Sierra Leone to our brothers,
2 he will tell us.

3 PRESIDING JUDGE: Mr Koumjian, there is a 'he' in here.

4 The witness has said, 'Charles Taylor - let me say Sankoh,
12:29:35 5 yes of, course, he was a rebel leader. He was fearful,'
6 et cetera.

7 THE WITNESS: I said Sankoh was a rebel leader to, just
8 like Charles Taylor was, but those of us who were with him,
9 some information - there was some information that he
12:29:55 10 didn't keep secret from us. That's what I meant.

11 Q. Mr Witness, did you yourself ever go with Foday Sankoh
12 to Charles Taylor's mansion in Gbarnga?

13 A. Yes.

14 Q. Did you ever see, yourself, Foday Sankoh using the
12:30:14 15 radio that you described?

16 A. The radio that I'm talking about was not outside. It
17 was inside this type of house that we are now. A part of
18 this house had a room. That was where the radio was. But
19 it was Charles Taylor who owned the radio. That was where
12:30:34 20 he went and we will stay by the vehicle and he will enter
21 into that house and when he came out, we will all go - we
22 would all board the vehicle and go back to the house where
23 he would tell us everything that he did.

24 Q. Did you yourself ever see the radio that you have
12:30:57 25 described?

26 A. In that house, I did not enter that radio room to see,
27 but the communication radio, I knew it very well. The same
28 radio that we were using in Sierra Leone was the same radio
29 that they were using in Gbarnga, that same type."

1 Now, Mr Taylor, the witness is describing not himself going
2 in to see the radio but what he is told about it later by
3 Foday Sankoh. But he is quite clear that it was in the same
4 house. What do you say about that?

12:31:35 5 A. But this witness just described a radio on a table and
6 other lines that - but then he says here that he didn't go in.
7 So how does he know that there is a radio that is on a table
8 inside that he does not go in or except it's Sankoh saying, "Oh,
9 the radio that is in there is sitting on a table." Here is a man
12:31:57 10 who is saying that he is outside at a vehicle. I don't know how
11 some of these boys talk, but I tell you, Foday Sankoh goes to
12 Gbarnga. Foday Sankoh, until he installs a radio, calls on NPFL
13 radio. There is no way that there's a radio inside the Executive
14 Mansion there. And so what this man is talking about, I can only
12:32:22 15 say that he is guessing or speculating where he describes a radio
16 on a table that he doesn't go in to see, that he is outside
17 beside a vehicle but he knows what's going on. I really don't
18 know what this man is trying to say or do. I don't know what his
19 objective is here, but I can just say what I have said to this
12:32:43 20 Court: I do not deny that Foday Sankoh used NPFL radio in
21 Gbarnga, but the description given here by this witness is
22 totally false, as he describes it here, and this is only based on
23 maybe what he thinks or what he speculates on. This is all I can
24 put it to.

12:33:05 25 Q. Tell me, Mr Taylor, the house you lived at in Gbarnga, just
26 describe it briefly for us, please. The house actually
27 physically slept and ate in.

28 A. I would almost say it is in an H, like the alphabet, like
29 almost like an H formation. At the back there is - there are

1 apartments, there are living quarters for me and the children,
2 and there is that line that goes through the H. There's a
3 corridor that walks to the front where you have administrative
4 offices and you have dining room and kitchen. It was the former
12:33:52 5 place used by the superintendent, like the governor, of that
6 region. So I live in the back, and you have to walk through a
7 little corridor and enter the front part of it.

8 Q. So the front part is offices; the back part is living
9 quarters, yes?

12:34:07 10 A. Yes.

11 Q. Now, I think we all understand what you mean. How many
12 floors?

13 A. No, no. Just one flat floor.

14 Q. Just one floor?

12:34:16 15 A. One floor.

16 Q. What's it constructed of?

17 A. Concrete. Concrete.

18 Q. Did it have a veranda?

19 A. Not in the - well, these short verandas are at the very
12:34:36 20 front, but at the back, no veranda.

21 Q. What are you talking about these short verandas at the
22 front? What are you talking about?

23 A. For example, you could walk out of the front administrative
24 office, you could walk out to a little place about - I would say
12:35:01 25 width - about 6 feet in width, just a short place with an iron
26 bannister, we call it, where you could just walk out for fresh
27 air and come back in. Not like a large veranda as you would know
28 where people could sit out on, no.

29 Q. So there wasn't a large veranda like that?

1 A. No, no, no, not at all.

2 Q. Now, the reason I ask you is this - the witness goes on:

3 "Q. When you went with Sankoh to Charles Taylor's mansion,
4 did you ever see Charles Taylor?

12:35:35 5 A. Yes, not once, not twice. I saw him.

6 Q. Did you observe any interaction between Charles Taylor
7 and Foday Sankoh.

8 A. Yes, the house. The house has a veranda. They used to
9 stand there. When they would have spoken in the house,

12:35:53 10 when Sankoh was about to leave, he would escort him up to
11 the door - up to the veranda. They would stand there for
12 about five minutes talking and we would see them."

13 True?

14 A. That is not true, but maybe the best thing in evidence

12:36:10 15 later for this Court is to take a picture of the building and
16 bring it. I think that would end this whole thing. There is no
17 veranda at that place, and I'm sure that in evidence we will
18 demonstrate this here for them.

19 Q. But was there that kind of interaction between yourself and
12:36:29 20 Foday Sankoh at the mansion?

21 A. No, there was not this kind of interaction. Foday Sankoh -
22 in fact, other witnesses testify here even to the contrary, that
23 they will come, Foday Sankoh will go in and meet me, and they
24 didn't know what we discussed and would leave. He is saying that
12:36:49 25 he is seeing Foday Sankoh and myself walking out like - but, no,
26 no. Foday Sankoh came in there, he came into my office, we spoke
27 and he left.

28 And where - in fact, where the parking lot is, where this
29 boy would definitely be, because he says he is by the vehicle, he

1 is not in a position to see me. In fact, the parking lot is put
2 at a corner. It's a large - in fact, the mansion over there that
3 is described is built - it's built and fenced in on a piece of
4 property I would say about 1.5 acres in size and the parking lot
12:37:32 5 is not right in front of the President's office. The parking lot
6 is at a place that, once you drive up, there's a place you drive
7 up to the front door, you get out of the vehicle and the vehicle
8 has to move and go to the parking lot. So where he is, he
9 doesn't even - he can't even see even Sankoh until Sankoh comes
12:37:51 10 back out to the vehicle. No.

11 Q. And he goes on:

12 "Q. Thank you. Now, Mr Witness, for how long did you
13 maintain this position as the ground commander for Sankoh
14 in Gbarnga? For approximately how long?

12:38:10 15 A. I was there for six months because I too wanted to
16 return to Sierra Leone, so I became disgruntled and I said
17 I was going back.

18 Q. Did you go back to Sierra Leone?

19 A. Yes.

12:38:23 20 Q. Where were you based when you went back to
21 Sierra Leone?

22 A. I was based in Pendembu in Kailahun District.

23 Q. Mr Witness, have you ever, since you returned - after
24 returning to Sierra Leone, did you ever go to Koindu [sic]
12:38:35 25 in Kono District? Koi du, forgive my pronunciati on. Koi du
26 in Kono District?

27 A. Yes, yes, in Kono. Yes, I went to Kono in 1992."

28 Now, pause there. Now, this man is claiming, Mr Taylor, he
29 is the ground commander for Sankoh's "mansion" for six month.

1 Did you know him?

2 A. No, I did not.

3 Q. Were you aware whether Sankoh had a ground commander at his
4 mansion?

12:39:06 5 A. I was aware that Sankoh had some boys there. I didn't know
6 that there was one or ground commander. I know he had a few
7 people at his house.

8 But, interestingly, counsel, he talks about - maybe we
9 could look at that 1992. He uses that year, and I don't see the
12:39:30 10 full context, but that could probably help the Court in trying to
11 establish the time that he is talking about, the establishment of
12 his presence in Gbarnga. Wouldn't that, I would think - that
13 passage that he is talking about, 1992, in line 18, "Yes, in
14 Kono. Yes, I went to Kono in 1992."

12:39:59 15 Q. In 1992. But he doesn't say when he left.

16 A. When he left in 1992. But he did say that he was in
17 Gbarnga for six months, okay. So when you look at the six months
18 that he's in Gbarnga and that he left and went back in 1992, and
19 we have established that as of May 1992, after these different
12:40:26 20 operations, Top 20 and Top 40, where witnesses after witnesses
21 came before this Court and said that all ties were cut in May
22 1992, then if we begin to figure that six months, so we - I mean,
23 the six months cannot be after May of 1992. So we're talking
24 about May, April, March, February. So that's putting us to late
12:40:55 25 1991 going into 1992, okay, which would establish, for our sake,
26 the time of the cooperation between the security - cooperation
27 between ourselves and Sankoh and not any time before. I mean,
28 this is the way I interpret it and I stand corrected on this.

29 Q. Now, this witness goes on, Mr Taylor, to give evidence to

1 this effect, in the context of obtaining arms and ammunition from
2 Liberia, do you follow me?

3 A. Yes.

4 Q. And he was asked how he would communicate, page 14154 of
12:41:40 5 transcript:

6 "A. It was radio communication. You know, any police
7 officer who was assigned like in Foya or in Voinjama, they
8 all had communication. So I would go and use their
9 communication to communicate with my people in
12:41:55 10 Sierra Leone. I will go and use the NPFL communication to
11 communicate with the RUF in Sierra Leone."

12 Do you know anything about that, Mr Taylor?

13 A. Again, unless a time is put to this, I would - I would only
14 agree to communication from where he says Foya or Voinjama, if it
12:42:25 15 is before the end of this time because I don't know --

16 Q. Which time?

17 A. Before May of 1992. So I - it's - I - it's possible that
18 if the RUF, with that cooperation at that time, came through that
19 area, it's possible that they could have communicated from
12:42:45 20 Voinjama or even from Foya.

21 Q. Well, pause, because he goes on:

22 "Q. Now, you said, once you made the communication,
23 someone or people would be sent to collect you. My
24 question is, what happened to the weapons that you had
12:43:04 25 bought once these people arrived?

26 A. We would load them on board the vehicle and we would go
27 to Sierra Leone.

28 Q. Now, Mr Witness, from where you were in Voinjama to
29 Buedu, while you were in Liberia at that time, were there

1 any checkpoints?

2 A. At that point in time, the ECOMOG had deployed in the
3 area. There were not many checkpoints. ECOMOG had
4 deployed all over, in many places around the area, and they
12:43:36 5 had eased the movement.

6 Q. Okay. You said there were not many checkpoints. Do
7 you recall passing through any checkpoints within Liberia
8 or at the border?

9 A. At the main border crossing where the ECOMOG were based
12:43:55 10 we did not used to pass through there. We used to use the
11 bypass. I had told you earlier that we had a bypass that
12 we used to pass through and when we wanted to take
13 ammunition from Liberia to come we would use that bypass.
14 We never used to use that main road.

12:44:16 15 Q. Mr Witness, approximately how many times did you, or if
16 you know the exact number, how many times did you go on
17 missions to purchase ammunition from ex-ULIMO in Lofa
18 County?

19 A. It was just at the start of things, because by then we
12:44:38 20 had just retreated from Liberia - I mean, sorry, from
21 Freetown anew and Sam Bockarie had not yet travelled to
22 Monrovia to meet Charles Taylor. That was supposed to be
23 the immediate ammunition that we will have with us to use
24 as defensive, but when he went to Liberia - I mean to
12:45:01 25 Monrovia to see Charles Taylor, we knew that we were going
26 to get arms and ammunition.

27 Q. When you say when he went to Monrovia to see Charles
28 Taylor, just again, so the record's clear, who do you mean
29 when you say he went to see Charles Taylor?

1 A. I mean Sam Bockarie. He went to Monrovia to see
2 Charles Taylor."

3 Okay, Mr Taylor?

4 A. Uh-huh.

12:45:26 5 Q. Have you comprehended all of what I've just read to you?
6 Right, let's take things in stages. We're looking to time events
7 now.

8 A. Uh-huh.

9 Q. "It was just at the start of things because by then we had
12:45:44 10 just retreated from Liberia - I mean, sorry, from Freetown."
11 When do you understand that to be?

12 A. Retreated from Freetown.

13 Q. From Freetown.

14 A. For the RUF.

12:45:59 15 Q. "From Freetown anew and Sam Bockarie had not yet travelled
16 to Monrovia to meet Charles Taylor."

17 A. Then he must be referring to '99, I would think. I can't
18 use his head, but the only Freetown situation that I know of is
19 January 1999. I don't know of any other Freetown situation

12:46:25 20 except the intervention in '98. But he has jumped so far for a
21 man that didn't want to stay in Gbarnga at the time. I can only
22 interject that he may be referring to 1999.

23 Q. And he says, "Sam Bockarie had not yet travelled to
24 Monrovia to meet Charles Taylor." When did you first meet
12:46:51 25 Sam Bockarie?

26 A. I first met Sam Bockarie in September of 1998.

27 Q. Now note also, "How many times did you, or if you know the
28 exact number, how many times did you go on missions to purchase
29 ammunition from ex-ULIMO in Lofa County?" Now, ex-ULIMO, what do

1 you understand by that, Mr Taylor?

2 A. My understanding of ex-ULIMO must - I could be wrong about
3 that - must reflect after July 1997 election.

4 Q. Why do you say that?

12:47:51 5 A. Because it is this period that they are no longer ULIMO.
6 They will be called ex-ULIMO. This is my understanding.

7 Q. So the use of that term suggests to you post July 1997. Is
8 that right?

9 A. This is my understanding. That is correct.

12:48:15 10 Q. And the reference to, "Sam Bockarie had not yet travelled
11 to Monrovia to meet Charles Taylor", you didn't meet Sam Bockarie
12 until September 1998, you tell us?

13 A. That is correct.

14 Q. Okay?

12:48:28 15 A. Yes.

16 Q. So if we put those two together, the time frame when this
17 witness is claiming that he was buying ammunition from ex-ULIMO
18 suggests to you what time frame, Mr Taylor?

19 A. That would be late 1998 into 1999.

12:49:01 20 Q. Did you, as suggested by this witness, provide Sam Bockarie
21 with arms and ammunition?

22 A. Never.

23 Q. When he went to Liberia to see you?

24 A. Never did. No. Did not provide Sam Bockarie with not even
12:49:22 25 one round of ammunition, no.

26 Q. Now, when Sam Bockarie came to Liberia to meet Charles
27 Taylor, bearing in mind the witness said, "He had not yet
28 travelled to Monrovia to meet Charles Taylor", which suggests for
29 the first time, Mr Taylor, who knew, if anybody, that

1 Sam Bockarie was coming to Liberia?

2 A. I would say at least five countries. The five members of
3 the Committee of Five on Sierra Leone knew that Sam Bockarie had
4 made contact and that discussions were ongoing and it had been
12:50:21 5 acceptable that I invite him to Liberia to speak to him based on
6 authorisation given to our committee.

7 Q. Now, bear in mind also this witness in this same passage of
8 his testimony speaks of ECOMOG being deployed in Lofa on the
9 border and manning checkpoints. Now, help us with this,

12:50:47 10 Mr Taylor: When you invited Sam Bockarie to come to Liberia on
11 that first occasion, did you alert ECOMOG to the fact that he was
12 coming?

13 A. Everybody knew, yes. They knew.

14 Q. And ECOMOG were deployed in Lofa at the time, were they?

12:51:08 15 A. We're talking late 1998. They had units in Lofa, yes.

16 Q. Now, what this witness is suggesting, Mr Taylor, is that
17 despite the five countries who knew, and despite the ECOMOG being
18 alerted, you gave Sam Bockarie a consignment of ammunition to
19 take back to Sierra Leone for defensive purposes. Did you do
12:51:40 20 that?

21 A. I did not do that. I didn't even have material for myself,
22 so how could I give Sam Bockarie material that I didn't even
23 have? The Government of Liberia during this period had no
24 weapons in terms of storage or anything. All weapons that had
12:52:07 25 been collected during the disarmament process and I see why - you
26 know, they forgot when they were helping to construct this lie,
27 this lie was being constructed on the premise that when I became
28 President I had taken all the weapons from disarmament. They
29 missed the boat. I did not have any weapons for even myself and

1 my security. So how could I give Sam Bockarie weapons when I
2 didn't even have for myself? It did not happen. The weapons
3 were in the hands of the international community that were
4 subsequently burned. Every last one of them were burned and
12:52:45 5 destroyed. I didn't have any weapons to give to anybody. It's a
6 lie.

7 Q. But, Mr Taylor, pause and let's not allow emotion to get
8 the better of us here. Listen clearly and carefully about this
9 testimony. Let me remind you what the witness is saying. The
12:53:07 10 witness says - he is asked: "How many times did you go on
11 missions to purchase ammunition from ex-ULIMO in Lofa County?"
12 Do you hear that?

13 A. Yes.

14 Q. Now, following the answer which he gives about Freetown and
12:53:27 15 Sam Bockarie receiving arms from you I at that point intervened
16 and said:

17 "I'm sorry, your Honours, but we still haven't got an
18 answer to the question which my learned friend asked which was,
19 'Approximately how many times did you go on missions to purchase
12:53:48 20 ammunition from ex-ULIMO fighters in Lofa County?' That question
21 has not been answered."

22 So Mr Koumjian asked the question again:

23 "Q. How many different times were you sent - first of all
24 sent to Lofa County to buy ammunition?

12:54:11 25 A. It happened up to two or three times."

26 Now, Mr Taylor, what do you say about the assertion being
27 made by the witness that not only are they purchasing arms from
28 ex-ULIMO fighters, but you're also supplying arms to
29 Sam Bockarie? Do you understand?

1 A. I understand.

2 Q. What do you say about that?

3 A. That is as misleading as it can ever get.

4 Q. Now, Mr Taylor, help us. Were you aware at the time that
12:54:50 5 the RUF were purchasing arms from ex-ULIMO fighters in Lofa
6 County?

7 A. No, I was not aware. If I had been aware that ex-ULIMO had
8 weapons up there I would have done everything to try to get them
9 for government forces. I was not aware at all. I was not aware.

12:55:18 10 Q. Now, Mr Taylor, on that note you would have done everything
11 to do what?

12 A. To try to retrieve those weapons from ULIMO in that
13 particular area. I was not aware they had weapons.

14 Q. But, Mr Taylor, tell me, at this time, the kind of period
12:55:37 15 being spoken about by this witness, did you have effective
16 control over Lofa?

17 A. No, I did not have effective control. This is what I say
18 retrieve. What we had done with some of the LPC people - what we
19 had done with some of the LPC people that we observed had hidden
12:56:01 20 some weapons, what we would do is we would promise to buy them if
21 they would want to sell them to us. So I was not going to order
22 them to bring them. We would have put into process a mechanism
23 of trying to buy them. If they were going to, you know, give
24 them to anybody else, we were going to try to buy them.

12:56:21 25 Q. Mr Taylor, what I mean is this: Did you have a material
26 ability to prevent or punish ex-ULIMO fighters who were selling
27 arms to the RUF?

28 A. No, no, no. I did not have the material ability to prevent
29 or punish - how do you punish people that you don't really have

1 control over, okay? I have control over the country as President
2 but I do not have the type of control that I can order, "Bring me
3 John Brown to Monrovia and we'll arrest" - no, I did not have
4 that capability.

12:56:57 5 Q. I mean, did you have the ability to prevent them from
6 engaging in this kind of trade?

7 A. No. I did not have the ability to prevent them. The only
8 possibility in the long term for the prevention of such actions
9 would have been the type of assistance that I wanted to begin to
12:57:20 10 properly demobilise, retrain. That would be later. But at that
11 time, no, I did not have the ability to prevent, because I was
12 not in the type of control to have knowledge of the existence of
13 those weapons, okay, that I could have prevented them from
14 selling them, no.

12:57:38 15 Q. Well, did you have the ability to punish them for becoming
16 involved in that kind of activity?

17 A. No, I did not have the ability to punish those ULIMO people
18 in that area. In fact, any attempt to really, really - let's
19 say, for example, if I had gotten some information that an
12:58:07 20 ex-ULIMO general was involved in selling arms, that would have
21 been a situation that I would have had to, with that information,
22 handle in a very delicate way because it could have provoked a
23 whole new war, okay, by trying to forcefully act. No, I did not
24 have the ability to punish them, no.

12:58:28 25 Q. Tell me, Mr Taylor, these ex-ULIMO combatants, were they
26 being paid a salary by the Liberian government?

27 A. Oh, no. Oh, no. No.

28 Q. So could you, for example - did you have the sanction of
29 stopping their pay?

1 A. No.

2 Q. Because of their involvement in such activities?

3 A. No, there was no salary. They were not paid. No. No, I
4 didn't have that type of situation where you could say, "Okay,
12:58:56 5 okay, we'll cut your pay this month or that." No, no, no, no,
6 no. No one was being paid.

7 Q. Help us. Did you - did you - were you in a position to
8 anticipate this kind of activity by the ex-ULIMO fighters?

9 A. No. To the best of our knowledge, we had all assumed - at
12:59:23 10 least if not full, substantial disarmament. And the mere
11 sinister fact that ULIMO were able to hide and bury the amount of
12 arms in question here showed that they were planning at least for
13 additional trouble. Because, you know, they never left the area
14 and we never pushed anybody out, so those that did not run away
12:59:53 15 back to Sierra Leone to go to Sierra Leone for fear that what
16 some of them said they would be arrested, stayed. And now, as
17 you look at it - you know, no one has the benefit of 20/20
18 hindsight - I can see that the people that remained there
19 probably just remained to protect their weapons.

13:00:12 20 Q. Now, Mr Taylor, did you know at the time, the time that
21 this witness is talking about, that ex-ULIMO fighters were
22 selling arms to the RUF?

23 A. No, I did not know. No. No, no, no, no.

24 Q. When did you first have knowledge of this kind of activity?

13:00:37 25 A. Quite frankly, I tell you, if I did not hear this thing in
26 this Court, I would have just remained blind. I never knew that
27 they were involved in any trade. The real outburst of actual
28 sale of arms by ex-ULIMO fighters, really, I heard most of it
29 here.

1 Q. So if you had no knowledge, Mr Taylor, were you in a
2 position to prevent it?

3 A. How could I prevent something that I don't know of? No.

4 Q. Or were you in a position to punish for involvement in such
13:01:23 5 activities?

6 A. No. No, I was not in a position. And, in fact, like I
7 say, it would have been a very delicate manoeuvre. It's
8 important for this Court to understand, it is - this - our
9 knowledge of the potential of renewed civil war in Liberia led us
13:01:51 10 to painfully asking every day for international assistance to
11 complete the demobilisation and the repatriation of our soldiers
12 and to get international assistance to begin retraining. Because
13 we knew historically that unless - unless you took part - unless
14 the international community assisted in those kinds of things,
13:02:23 15 even dealing with the large amount of NPFL fighters, okay, you
16 would still have some problems. So I had no knowledge. And I
17 was hoping very much that we could get this assistance because we
18 knew of the potentials of this open-ended situation of probably
19 either falling back into a renewed civil war. So I didn't have
13:02:56 20 the capacity to punish and didn't know what they were doing.

21 Q. Let's move on with this witness. Page 14181 of the
22 witness's testimony on 20 August 2008:

23 "Q. Sir, can you tell us, was the attack in Kono District
24 and on Koidu Town that was planned at the forum that you
13:03:20 25 attended with Issa Sesay successful?

26 A. Yes.

27 Q. You've talked about Issa Sesay coming with some
28 ammunition. Do you know whether ammunition came from?

29 A. Yes.

1 Q. What do you know about that?

2 A. At that time we did not have anywhere else to get
3 ammunition from except Liberia from Charles Taylor. Sam
4 Bockarie went to Liberia and Issa Sesay stayed in charge in
13:03:50 5 Buedu as commander. So when Sam Bockarie returned to Buedu
6 and he brought the ammunition and he handed them over to
7 Issa, Issa took the ammunition to Kono for us to attack
8 Koidu, and every one of them was new. But before that,
9 Rambo had given me the information because he was the high
13:04:14 10 command at the place.

11 Q. The forces that were defending Koidu Town and other
12 parts of Kono District, were those forces well armed or not
13 well armed.

14 A. It was ECOMOG. They were from all over. They were
13:04:30 15 well armed."

16 Now, pause there. Now, Mr Taylor, remember, this is the
17 witness who in the earlier passage I mentioned to you mentioned
18 arms being purchased from ex-ULIMO combatants.

19 A. Yes.

13:04:46 20 Q. And also arms coming from you, yes?

21 A. Yes.

22 Q. Now, what do you say about this then, this answer:

23 "At that time we did not have anywhere else to get ammunition
24 from except Liberia from Charles Taylor"? Do you follow me?

13:05:07 25 A. I follow you.

26 Q. What do you say about that?

27 A. He is - I mean, I don't understand. I don't understand why
28 - why people would do this kind of thing. Well, I can just tell
29 you: He didn't get any ammunition from this Charles Taylor.

1 That's totally incorrect, and this is made up, and I guess,
2 again, just not to prolong things, it's because of the fact that
3 when they are constructing this thing, we are supposed to be
4 awash in arms and ammunition and so it's easy for someone to come
13:05:55 5 up and say, "We got it from Charles Taylor." I had no arms. I
6 had no ammunition. He did not get - or Bockarie never got
7 anything from me. Never.

8 Q. But, Mr Taylor, at one point the witness is suggesting two
9 sources: Ex-ULIMO and Charles Taylor.

13:06:13 10 A. Uh-huh.

11 Q. He is now saying there's nowhere else but Charles Taylor.
12 So what do you say about that?

13 A. That means that maybe then the ex-ULIMOs have run out, I
14 guess he is trying to say. That's a lie. That's not true. He
13:06:29 15 did not get any weapons from me. And if weapons came out of
16 Liberia, as he says, and several witnesses have come here and
17 said that they bought weapons from ULIMO, I was not aware that
18 ULIMO had weapons over there to sell. If I was aware, I would
19 have probably tried to encourage them to turn them over to the

13:06:56 20 government and ECOMOG is in the area. I'm sure they are doing
21 this secretly because ECOMOG - why is ECOMOG still in that area?
22 They are still there for security purposes. And if ECOMOG had
23 known, probably they would have stopped it. And now he talks
24 about new. New weapons. Where would new weapons come from in
13:07:17 25 Liberia when all the weapons are locked up in the United Nations
26 under UN custody? Where would the weapons come from? It just
27 never happened.

28 Q. And the witness continues in this vein, page 14182, line 9:
29 "Q. Mr Witness, I'm going to go back to when you said Issa

1 Sesay brought the ammunition. First of all, where was Issa
2 Sesay coming from, if you know, with the ammunition?

13:08:00 3 A. He brought the ammunition from Buedu. He brought them
4 to Kono, but we knew that it was Sam Bockarie who handed
5 the ammunition over to him.

6 Q. And can you repeat, and perhaps give us more detail,
7 how was it that you knew that the ammunition had come from
8 Charles Taylor?

9 A. Even before Sam Bockarie - I mean, Issa Sesay left
13:08:23 10 Buedu to come, like I said earlier, I got the information
11 first from Rambo who told me that Sam Bockarie had gone to
12 Charles Taylor, but at that time we never used to refer to
13 him that way. We used to call him Father. He said he had
14 gone to him for arms and ammunition and we were on that
15 when Sam Bockarie arrived in Buedu and we got the

13:08:46 16 information through radio communication that he had
17 returned and after two to three days, Issa travelled to
18 Kono and he met us there with the materials with many
19 manpower. They in fact carried it on their heads because
13:09:05 20 they did not use the motorway. So those were the ones we
21 used for the attack on Kono and that was - those were
22 the materials that we [sic] took."

23 Now, what do you know about that, Mr Taylor?

24 A. Nothing whatsoever. Nothing whatsoever. Don't even know
13:09:29 25 when Kono is attacked. I know nothing about what this witness is
26 talking about. Know nothing about it. Know nothing about it.
27 But I guess it's a part of the construct, when I listen to the
28 Prosecution's case, so I guess he is following the construct that
29 there was supposed to be a Kono attack before they went on to

1 Freetown and they spoke. I was trying to put his little pieces
2 together here. I know nothing about it, about how Kono got
3 attacked and why. Did not provide the material for it and didn't
4 know and didn't have material to provide for any attack, so I
13:10:12 5 have no idea what he is talking about.

6 Q. Now, he goes on:

7 "Q. Who was your commander at the time that you were the
8 mining commander?

9 A. There were two people who were my commanders, one was
13:10:35 10 Sam Bockarie and two was Issa Sesay.

11 Q. Up until the end of your time as mining commander, you
12 said you were the commander up until sometime in 2000, were
13 both Sam Bockarie and Issa Sesay your commanders or did
14 anything change?

13:10:59 15 A. Sam Bockarie left at a point in time and went to see
16 Charles Taylor in Liberia, so Issa Sesay was now in
17 command. "

18 Do you understand that, Mr Taylor?

19 A. Yes.

13:11:17 20 Q. "Sam Bockarie left at a time in point and went to see
21 Charles Taylor in Liberia, so Issa Sesay was now in command. "

22 Now, Mr Taylor, let's pause and put that together, shall we.

23 When did Sam Bockarie come to reside in Monrovia?

24 A. In December of 1999.

13:11:42 25 Q. Now, we needn't go into the reasons as to why because we've
26 looked at that ad nauseam, okay?

27 A. Uh-huh.

28 Q. When was, as you've explained to us, Issa Sesay appointed
29 interim leader of the RUF?

1 A. In August of 2000.

2 Q. So that's, what, eight months after Bockarie arrives in
3 Monrovia?

4 A. That is correct.

13:12:11 5 Q. Now, was it the case that Sam Bockarie "left at a point in
6 time and went to see Charles Taylor in Liberia, so Issa Sesay was
7 now in command"?

8 A. Was that the point? After Sam Bockarie --

9 Q. Did Sam Bockarie, when he came to Liberia in December '99,
13:12:43 10 did he come to see you, Charles Taylor?

11 A. No, this witness doesn't know the details. Seeing me was a
12 part of it, but he was removed from Sierra Leone, but he
13 interprets that as coming to see me. He doesn't know better.

14 But Sam Bockarie doesn't come to see me. He comes out of
13:13:02 15 Sierra Leone as an instruction for the peace process to go on,
16 but you can see how he interprets it. I think this is a matter
17 of ignorance. He probably doesn't know better.

18 Q. And as far as you're aware, Mr Taylor, upon Mr Bockarie's
19 departure in December 1999, did Issa Sesay immediately take over
13:13:32 20 as leader of the RUF, to your knowledge?

21 A. No, did he not immediately take over as leader of the RUF,
22 no.

23 Q. Now, another topic in relation to the same witness --

24 A. Excuse me, counsel, you know, I hope in the future we might
13:14:06 25 be confronted with, "Well, you said that Issa Sesay did not take
26 over as leader of the RUF", so I don't know so to whether you
27 want to qualify this because your question was, "Did he take over
28 immediately as leader of the RUF" and I'm saying no, but I don't
29 know, maybe the other side will say, "Well, you said that Issa

1 Sesay didn't take over as leader." I'm not sure if we need to
2 qualify.

3 Q. Qualify it in any way you want to, Mr Taylor.

4 A. Okay. Well, Issa Sesay takes over the command structure of
13:14:40 5 the RUF but is formally made leader through a process later on by
6 August. So I don't want it to be that I misled the Court by the
7 other side saying that you said Issa Sesay - there is no other
8 leader before Issa Sesay that continues on into August of 2000,
9 okay. But the confirmation of Issa Sesay as the leader happens
13:15:04 10 in August.

11 Q. Now, going on to another topic with this witness. Page
12 14228, line 24:

13 "Q. Now, sir, you've talked about delivering diamonds to
14 Sam Bockarie. Do you know, and if you don't, tell us, what
13:15:37 15 Sam Bockarie did with those diamonds?

16 A. Those diamonds that we used to give to Sam Bockarie,
17 Sam Bockarie took those diamonds to Liberia to Charles
18 Taylor.

19 Q. How do you know that?

13:15:57 20 A. Sam Bockarie was my colleague. We all trained together
21 and most of the times I was not assigned to particular
22 areas. I would stay with him in Buedu or some other places
23 that he stayed. So I used to get so many information from
24 him.

13:16:21 25 Q. I understand you have told us that you were close to
26 Sam Bockarie but please answer directly my question. How
27 do you know that Sam Bockarie took the diamonds that you
28 gave him to Charles Taylor?

29 A. I know that since the time Foday Sankoh himself was in

1 command and up to the time that he was in Ivory Coast - I
2 mean when he was held in Nigeria, he even advised
3 Sam Bockarie and Issa Sesay that anything that we got that
4 was a mineral, we shouldn't misuse, we should give them to
13:17:00 5 Charles Taylor for safekeeping.

6 Q. How do you know that Foday Sankoh advised Bockarie and
7 Sesay to give the diamonds to Charles Taylor for
8 safekeeping?

9 A. Those who had travelled with the Pa, I mean
13:17:19 10 Foday Sankoh, to Togo, like there was one of Pa Foday
11 Sankoh's bodyguards called Junior. He came back with the
12 same message in Buedu. That was what Foday Sankoh said
13 that Mosquito - Issa Sesay shouldn't misuse any government
14 property, especially diamonds which are minerals. He
13:17:42 15 said they should give them to Sankoh - I mean Charles
16 Taylor for safekeeping. Also after that I heard that from
17 Sam Bockarie and the radio man who was communicating from
18 Sam Bockarie. He brought the same message written on paper
19 that Foday Sankoh had sent that message and most times when
13:18:05 20 we left Sierra Leone to go to Liberia, any mineral we had
21 it used to go to Sankoh. That is something I know about."

22 Now, Mr Taylor, are you aware of such an instruction given
23 by Foday Sankoh?

24 A. I'm not aware of that at all. Not aware. Not aware.

13:18:37 25 Q. And you will note the time line. "I mean when he was held
26 in Nigeria," yes?

27 A. Yes.

28 Q. Now, we know that to be March 1997?

29 A. That is correct.

1 Q. In March 1997, Mr Taylor, what are you doing?

2 A. March of 1997 I'm deep - very deep in campaigning for the
3 presidency of Liberia.

4 Q. Well, according to this witness, at that time the RUF were
13:19:17 5 receiving instructions from Sankoh that effectively you should
6 become the banker. Do you follow me?

7 A. I follow you.

8 Q. What do you say about that, Mr Taylor?

9 A. I say it's a blatant lie. I have not been in contact with
13:19:33 10 any Sankoh and there have been a lot of evidence led before this
11 Court that will substantiate the fact that there is no contact
12 even while Sankoh is - even before he is arrested in Nigeria.
13 From the time he goes all the way to Abidjan in 1996 there's no
14 contact. There's no contact for anyone to say that Foday Sankoh
13:19:57 15 is supposed to say, "Take this to Taylor" or, "Don't do this."

16 In Liberia I'm still not elected President. There's a
17 Council of State. By this particular time I'm not on the
18 council. The country is clear of war material. We are free, we
19 are moving around, campaigning for the presidency. There's been
13:20:21 20 not one witness who came before this Court to say, "While we were
21 in Abidjan old man Sankoh told us to go to see Taylor", or, "I
22 called Mr Taylor on the telephone and we'll talked." There is no
23 contact.

24 Q. Mr Taylor, let's look at this carefully, because we want to
13:20:39 25 be clear about your position. Let's remind ourselves of the
26 witness's answer. Page 14229, line 9:

27 "I know that since the time Foday Sankoh himself was in
28 command and up to the time he was in Ivory Coast" - and then he
29 corrects himself. "I mean when he was held in Nigeria. He even

1 advised Sam Bockarie and Issa Sesay that anything we got that was
2 a mineral, we shouldn't misuse it, we should give them to Charles
3 Taylor for safekeeping."

4 Do you see that?

13:21:21 5 A. Yes.

6 Q. Sankoh is arrested in March 1997?

7 A. Yes.

8 Q. As we've observed?

9 A. Yes.

13:21:28 10 Q. Question number one: When do you first meet Sam Bockarie?

11 A. I meet Sam Bockarie in September of 1998. That's when I
12 meet Sam Bockarie.

13 Q. So that's, what, 17 months, isn't it, after Sankoh has
14 given the order?

13:21:54 15 A. Apparently based on his timeline, yes.

16 PRESIDING JUDGE: Yes, Ms Hollis?

17 MS HOLLIS: I do hesitate to rise but Defence counsel is
18 mischaracterising the evidence before this Court about

19 Foday Sankoh in Nigeria as well as the plain language that is
13:22:13 20 used here. He says that when he was held in Nigeria. He wasn't

21 held in Nigeria just one month, March. That's well known. It
22 was well beyond that. So it would be mischaracterising the

23 evidence to say that this communication that the minerals were to
24 be given to Charles Taylor must have happened in March of 1997

13:22:37 25 because Foday Sankoh, as this Court and Defence counsel well
26 know, was held in Nigeria for some time after his arrest in March

27 of 1997.

28 PRESIDING JUDGE: Do you want to answer that objection?

29 MR GRIFFITHS: Yes, I do, please, Mr President. Now, the

1 Logical inference from - the plain reading of this text to my
2 mind is that Foday Sankoh's ability to move and control are
3 curtailed by the fact of his arrest and consequently at that
4 point control is being shifted to Charles Taylor. In my
13:23:18 5 submission that is the clear inference to be drawn from this
6 text.

7 So consequently it logically follows, and in our submission
8 is permissible, for us to work on the premise that it's at the
9 point of arrest when control is shifted to somebody else. So in
13:23:38 10 our submission it's perfectly legitimate for us to interpret the
11 plain words of the witness - their witness - in that way.

12 PRESIDING JUDGE: Ms Hollis, I've noted your objection.
13 Perhaps this is a matter you can follow up further in
14 cross-examination.

13:23:58 15 MS HOLLIS: Thank you.

16 PRESIDING JUDGE: Go ahead, Mr Griffiths.

17 MR GRIFFITHS:

18 Q. Now, Mr Taylor, Mr Sankoh is arrested in March of 1997.
19 Help us, when did you first meet Issa Sesay?

13:24:14 20 A. I first meet Issa Sesay around May of 2000 or thereabouts.
21 First meeting.

22 Q. So on my calculation that's about three years after
23 Mr Sankoh has been arrested in Nigeria?

24 A. Yes, if we go back to March of 1997, '98, '99 - yes, that's
13:24:46 25 about three years. Issa Sesay, yes.

26 Q. And help us, Mr Taylor. During this period were you, in
27 effect, the guardian of RUF diamonds, safekeeping them?

28 A. No, not at all. Never safe kept or received any diamonds
29 from Sam Bockarie or Issa Sesay. None of them. Not one.

1 Q. Let's go on. Page 14230, line 11:

2 "Q. Sir, during the time that you were the mining
3 commander, you have told us about your relationship with
4 Sam Bockarie, did he ever discuss with you anything about
13:25:54 5 mining and diamonds?

6 A. Yes.

7 Q. Do you recall any of the instructions or any of the
8 words or things that Sam Bockarie would talk to you about
9 regarding diamonds?

13:26:07 10 A. Yes.

11 Q. Tell us what you remember.

12 A. The reason why I was sent over even that mining,
13 because I can say we were many in the RUF but those in whom
14 they had such a confidence to undertake such activities
13:26:27 15 were not many. And like we knew in the RUF it was only
16 minerals that solved our problems in helping achieve our
17 goals, so he used to call me and give me lectures on how to
18 put pressure and that if we got diamonds we would be able
19 to get arms and ammunition and so that was the work he sent

13:26:48 20 me to go and do in Kono. So the diamonds that we got were
21 the diamonds that he" - that being Sam Bockarie - "took to
22 Monrovia to Charles Taylor for us to get our supply of arms
23 and ammunition to be able to fight the war so that the
24 enemy will not conquer us. So that was what he used to
13:27:15 25 tell me and he used to advise me to double and redouble my
26 efforts.

27 Q. Sir, during the time that you were the mining
28 commander, did you take any trips outside of Sierra Leone?

29 A. I did not go to a foreign country."

1 Then he went on, Mr Koumjian having rephrased the question:
2 "Q. I'm going to ask you a slightly different question,
3 Mr Witness. You have told us about going to Liberia and on
4 your operations to Lofa County. Did you ever take any
13:27:53 5 trips after that anywhere else in Liberia?

6 A. Yes, I travelled to Liberia but at the time I was doing
7 the mining I did not travel any more, but at the time I was
8 not in the mining sector I used to travel to Liberia."

9 Now, Mr Taylor, same point being made again. Did

13:28:15 10 Sam Bockarie bring diamonds to you in Monrovia?

11 A. Sam Bockarie never brought diamonds to me in Monrovia.

12 Q. Tell me, before Sam Bockarie finally moved to Liberia in
13 December 1999, how many times did he come to Monrovia, Mr Taylor,
14 roughly?

13:28:41 15 A. I would say within - we're talking of a period of a year
16 and about two months. Oh, Sam Bockarie could have come to
17 Liberia at least I would say a half a dozen times within that
18 period.

19 Q. And what period are we talking about?

13:29:03 20 A. We are talking about September 1998 through December 1999.

21 MR GRIFFITHS: I intend to move on to another topic,
22 Mr President. Would that be a convenient point?

23 PRESIDING JUDGE: Yes, thank you, Mr Griffiths, that's a
24 convenient point. We'll adjourn for lunch and reconvene at 2.30.

13:29:27 25 [Lunch break taken at 1.29 p.m.]

26 [Upon resuming at 2.30 p.m.]

27 PRESIDING JUDGE: Yes, Mr Griffiths.

28 MR GRIFFITHS: Mr President, can I say, it's not the fault
29 of the security staff that Mr Taylor wasn't in court. He had

1 come in but had forgotten to use the facilities before he came
2 in, so that's why he wasn't seated beforehand:

3 Q. Right. Mr Taylor, we're still dealing the witness TF1-367.

4 A. Yes.

14:31:13 5 Q. I'm moving on to another point now in respect of that
6 witness's evidence. At page 14233 of the witness's evidence - of
7 the transcript, we find this:

8 "Q. Just to clarify something you said just a few

9 questions before, you said at first you were lodged at

14:31:37 10 Jungle's place. Did you stay anywhere else during that

11 stay in Monrovia, or did you spend all of the nights at

12 Jungle's place?"

13 Now, let's pause there. Do you know someone called Jungle,

14 Mr Taylor?

14:31:54 15 A. No, I don't. I don't know. I have heard the name, but I
16 don't know the individual.

17 Q. "A. No, where they took us to, it was Jungle who received

18 us, so he went and lodged us. The place is at ELWA

19 Junction."

14:32:16 20 ELWA Junction, Mr Taylor?

21 A. Yes, there's an E-L-W-A, ELWA Junction. Yes, there's a
22 junction.

23 Q. Where?

24 A. In Monrovia. Just off Congo Town in Monrovia, yes.

14:32:30 25 Q. Now, because ELWA Junction features, I wonder if I could
26 pause again for a moment, please, and we just have a quick look
27 at the Monrovia map so that when in due course we return to
28 discuss that location, we've got an idea where it is.

29 Okay. Mr Taylor, just quickly change seats, please, and

1 indicate where it is. If it's not on the map, just tell us in
2 which direction one would travel to get there, yes?

3 A. Yes. Okay. Well, ELWA Junction would be - that would be
4 somewhere - you see where it says the direction to the
14:33:53 5 international airport here?

6 Q. Yes.

7 A. This boulevard, that's the same Tubman Boulevard that runs
8 so, so I would just approximate it, if I may - can I mark on
9 this?

14:34:09 10 Q. Well, I'm not so sure it's necessary to mark.

11 A. Okay.

12 Q. In which direction is it?

13 A. ELWA Junction would be at an intersection here that turns
14 off the boulevard to go toward the airport is what is called ELWA
14:34:24 15 Junction.

16 Q. ELWA Junction?

17 A. That is correct.

18 Q. So is it actually shown on the map, Mr Taylor?

19 A. No, no, no, it's not.

14:34:29 20 Q. So it's off the map in that direction going towards the
21 international airport?

22 A. Yes.

23 Q. And is it a major junction?

24 A. It's a major junction. It goes into - you're coming from
14:34:40 25 the boulevard, at that junction, you may turn right to go to the
26 Roberts International Airport. If you continue, you're going
27 into the township of Paynesville.

28 Q. Okay, fine. Thank you. Right, we can put that away, and
29 can you return to your seat, please:

1 "Q. Do you know, did Sam Bockarie go anywhere else besides
2 Jungle's place while you were on that trip to Monrovia?

3 A. Yes.

4 Q. Tell us what happened.

14:35:21 5 A. We were at the house when Jungle came with a jeep and
6 he called him and he said Benjamin Yeaten was calling on
7 him and so they went. But when they went and on his
8 return, he told us that it was the Pa who called him and
9 all of us, that when he said the Father, he was referring
10 to Charles Taylor. He said he was the one that called on
11 him."

12 Now, do you recall such a meeting, Mr Taylor?

13 A. I would have to - I'm not sure if he in here refers to the
14 time that he's talking about, because, for the benefit of the
14:36:07 15 Court, when I here ELWA Junction, I'm reminded of - because this
16 is the area that Sam Bockarie lived when he moved to Monrovia
17 where we gave him a house. That's the same junction. So I don't
18 know what period he's talking about here to be sure of to answer,
19 because I met Sam Bockarie on many occasions that he came to
14:36:31 20 Monrovia, but on this particular occasion, in his reference here
21 to ELWA Junction, I'm not sure if he's talking about pre-December
22 1999 or post-1999. I would be - I would, you know, not know how
23 to respond to this thing, especially with the reference to ELWA
24 Junction.

14:36:55 25 Q. Because ELWA Junction was where Bockarie was living after
26 he came to Liberia?

27 A. Yes, yes.

28 Q. All right. Well, let's put the question differently then.

29 Do you recall an occasion after Sam Bockarie relocated to Liberia

1 when you met Jungle, Benjamin Yeaten and this witness on an
2 occasion?

3 A. No, never. No, no. Benjamin Yeaten, this witness and
4 Jungle, no, no, never, never.

14:37:37 5 Q. Let me ask it differently then. Do you recall a meeting
6 involving those named individuals before Sam Bockarie relocated
7 to Monrovia?

8 A. No, these individuals would not be in a meeting with me.
9 And not to confuse the Court, ELWA is the same as E-L-W-A. We've
14:38:01 10 heard E-L-W-A, that's the same thing, ELWA, E-L-W-A, Junction.

11 Q. Now, in this regard, the witness's time continued in this
12 vein. There was a break - the morning break was taken
13 immediately after he gave that answer. Upon returning, the
14 witness was asked:

14:38:26 15 "Q. Mr Witness, your last answer that you gave included a
16 lot of pronouns. You said 'he' a lot and it's not clear
17 who you are talking about. Let me read back my question
18 and your answer and then ask you to repeat your answer
19 putting the names instead of saying 'he'."

14:38:48 20 I won't repeat the question that was put, but the answer
21 then becomes:

22 "A. Yes. First he went to Jungle's place, and after that,
23 Jungle came and said Benjamin Yeaten was calling him. But
24 after Sam Bockarie returned, he said it was Charles Taylor
14:39:06 25 who had called him. So that was where he was coming from.

26 Q. Okay. You said after Sam Bockarie returned he said it
27 was Charles Taylor who had called him. Who told you that,
28 that Charles Taylor had called Sam Bockarie?

29 A. He, Sam Bockarie himself, when he came back to us at

1 the house, that's when he said - he, Sam Bockarie, said
2 Charles Taylor had called him.

3 Q. Now, you said you spent a couple - well, do you recall
4 anything else that Sam Bockarie told you about this meeting
14:39:42 5 with Charles Taylor? If not, then just tell us.

6 A. I don't know everything, but there were some things
7 that he explained to me. Not everything, but he gave me
8 some brief explanation. One of them was, he told us about
9 how to strengthen the security in Lofa County.

14:40:08 10 Q. Explain what Sam Bockarie told you about in relation to
11 his meeting with Charles Taylor?

12 A. That's what I'm trying to explain. I said one of them
13 was that Sam Bockarie should not forget about Lofa, because
14 that was our main supply route from Liberia to Sierra
14:40:30 15 Leone.

16 Q. Who said that Sam Bockarie should not forget about
17 Lofa?

18 A. According to Sam Bockarie, it was Charles Taylor who
19 told him that he, Sam Bockarie, should not forget about
14:40:45 20 Lofa County's security because Lofa County was RUF's main
21 supply route leading to Liberia."

22 Pause there. Now, Mr Taylor, you recall the earlier
23 reference to ELWA Junction, yes?

24 A. That is correct.

14:41:11 25 Q. Now, let us clarify one or two matters before I come to ask
26 you a question. When did Sam Bockarie first go to live at or
27 near ELWA Junction?

28 A. In December of 1999.

29 Q. Prior to that, on occasions when he came to Monrovia, where

1 did he stay?

2 A. He stayed at the guesthouse provided by the government.

3 Q. That location which on an earlier occasion you marked on a
4 map?

14:41:46 5 A. That is correct.

6 Q. Now, after Sam Bockarie relocated to Monrovia in December
7 1999, did he play any further role in relation to the RUF?

8 A. None whatsoever. None.

9 Q. Now, bearing in mind the reference in that witness's
14:42:09 10 testimony to ELWA Junction and Sam Bockarie and that witness now
11 saying that you ordered Sam Bockarie at a meeting held with him
12 to strengthen Lofa County, what do you make of that, Mr Taylor?

13 A. But what would be - this is totally - what do I want to
14 say. It's totally off the track. Totally. What is going on in
14:42:43 15 Lofa County before December of 1999 that Sam Bockarie would have
16 to secure because it is the main supply route? There is nothing
17 going on in Lofa County that Sam Bockarie has to keep a supply
18 route open there, no. I mean, so I don't know what this boy is
19 talking about. This is totally off - totally off the wall.

14:43:10 20 Q. Well, let's take it in stages, Mr Taylor. Let's not get
21 ahead of ourselves. Prior to December 1999, yes? As far as
22 you're aware, was there any need for Sam Bockarie and the RUF to
23 strengthen security in Lofa County?

24 A. To the best of my knowledge, no, there was no need.

14:43:36 25 Q. Question number two: After Sam Bockarie relocated to
26 Monrovia in December 1999, was he engaged in any military
27 activities in Liberia?

28 A. None whatsoever. None whatsoever.

29 Q. And it was after he relocated in December '99, as I

1 understand it, that he lived at ELWA Junction?

2 A. That is correct.

3 Q. So help us. Why would you, at a meeting with him as
4 alleged by this witness, be telling him, perhaps after December
14:44:17 5 1999, to strengthen Lofa County? Do you follow me?

6 A. I follow you. There is no reason, that's why I'm saying
7 these boys confuse things. There is no contact. We make sure
8 that Sam Bockarie is not involved with any military activities
9 following his arrival in Liberia in December of '99. None
14:44:41 10 whatsoever. Sam Bockarie does not even - he doesn't even go near
11 the guesthouse any more. He doesn't even go near the guesthouse.
12 The men that come in with Sam Bockarie that are granted
13 citizenship are taken away. They are being trained. He has
14 nothing - absolutely nothing to do with them. He is not involved
14:45:06 15 in any security activities and doesn't have the means. Even if
16 one were to assume that there are activities going on in Lofa, he
17 doesn't have the means.

18 But his coming to Liberia was not a design by
19 Charles Taylor to bring him to help me or to do whatever. His
14:45:28 20 plan - the design to bring Sam Bockarie to Liberia was a design
21 put together by ECOWAS, implemented by two of the Heads of State
22 on the ground at the time. Because when that decision was taken
23 for that extraction it was not just Charles Taylor; Obasanjo was
24 right there when that decision was taken and executed. So he is
14:45:53 25 not used in any shape or form, and so he cannot be asked to help
26 with security in Lofa.

27 Q. Now, for completeness we should look at the remaining
28 testimony given by this witness on this topic:

29 "A. According to Sam Bockarie, it was Charles Taylor who

1 told him that he, Sam Bockarie, should not forget about
2 Lofa County's security because Lofa County was the RUF's
3 main supply route leading to Liberia.

4 Q. Okay. And what happened after the two or three days?
14:46:40 5 What did you do after the two or three days you spent in
6 Monrovia?

7 A. We decided to come back to Sierra Leone.

8 Q. Who did you travel with?

9 A. It was Sam Bockarie and I, but we travelled together
14:46:57 10 with - we were not in the same vehicle. Jungle and Zigzag
11 Marzah too travelled.

12 Q. How many vehicles did you come with to Monrovia?

13 A. There were two vehicles, a jeep and a truck.

14 Q. How many vehicles were with you when you went back to
14:47:17 15 Sierra Leone?

16 A. That is what I have spoken. I said we returned with
17 two, a jeep and a truck.

18 Q. Do you know if anything was in the truck?

19 A. Yes.

14:47:29 20 Q. Can you please explain?

21 A. There was ammunition in the truck."

22 Do you know anything about that, Mr Taylor?

23 A. No, nothing about that. So he's talking about pre-1999
24 here. No.

14:47:44 25 Q. So what he's saying is pre-1999 Bockarie's in Monrovia,
26 goes to see you, you tell him to strengthen Lofa County to secure
27 the supply route, and he goes back happily laden with ammunition.
28 Know anything about that, Mr Taylor?

29 A. Absolutely nothing about it.

1 Q. Now, Mr Taylor, we should deal with care. Was there not an
2 incursion, you told us, into Liberia in August 1999?

3 A. Yes, we had an incursion that had been handled very rapidly
4 by Mosquito to Spray, yes.

14:48:28 5 Q. Now help us. Did you, for example, seek to recruit another
6 Mosquito, Sam Bockarie, to assist with security in Lofa because
7 of that incursion? Do you follow me?

8 A. Yes, I follow you. But it's important for us to also
9 interject something here. At the period that we're talking
14:48:52 10 about, Foday Sankoh - Foday Sankoh - we're talking about 1999,
11 what he's talking about. Following July of 1999 the leader of
12 the RUF is what? Is Foday Sankoh. He's back in Sierra Leone,
13 okay? Foday Sankoh arrives back in Sierra Leone in October of
14 1999. So dealing with Sam Bockarie as the leader and telling him
14:49:33 15 you must do this and do that, I mean, to me it would just be out
16 of the question, okay, because if there's anybody I ought to be
17 talking about or talking with to plan anything, if there's a need
18 for security, it should be Foday Sankoh.

19 Q. Of course, you'd met him in Monrovia in the September,
14:49:53 20 hadn't you, with Johnny Paul Koroma?

21 A. Of course. Why am I not talking to Foday Sankoh? Why am I
22 talking to Sam Bockarie as though I'm - even later on when Sam
23 Bockarie begins to disrespect Sankoh, I'm one of the first to say
24 it's unacceptable. This agreement, Sankoh signed it, we must put
14:50:14 25 our feet down. We did, we moved him. Why must I be speaking to
26 Sam Bockarie at this time and not Foday Sankoh? It just - that's
27 not true. That's not true.

28 Q. Very well. The same witness goes on, Mr Taylor, at page
29 14254 of the transcript, testimony given on 21 August 2008, to

1 deal with another matter:

2 "Q. Do you recall what year it was that you were in
3 Guinea?

4 A. 2000. The year 2000.

14:50:59 5 Q. Do you recall if it was the dry season or rainy season?

6 A. It was - it was coming close to the rainy season, but
7 it was not deep in the rainy season. It was at the end of
8 the dry season.

9 Q. Thank you."

14:51:16 10 And he goes on to say this:

11 "Q. Sir, tell us how it was that you went to Guinea.
12 Explain what happened.

13 A. My trip to Guinea was not done by me alone. Some
14 other people went there and it was a directive. It was an
14:51:40 15 order given to me - given to Morris Kallon by Issa Sesay,
16 and he asked us to go there.

17 Q. Okay. At the time that you went to Guinea, who was
18 commanding the RUF?

19 A. It was Issa Sesay who was commanding the RUF at that
14:51:55 20 time."

21 Now, Mr Taylor, did you have anything to do with the RUF
22 deploying in Guinea in 2000?

23 A. Nothing to do with it, no.

24 Q. Now, it was coming close to the rainy season in 2000. Help
14:52:21 25 us, roughly when in the year would that be?

26 A. Well, for what we say in Liberia, the beginning of the
27 rainy season in Liberia, that would be around - some years it's
28 around May. I would say May. Generally June - May/June, that
29 would be the beginning of the rainy season because by that time

1 brushing is over. That is what we would take it to be there.

2 Q. May/June?

3 A. That is correct.

4 Q. Let's just go back over the passage, because we may gain
14:53:04 5 further assistance from it?

6 "Q. Do you recall if it was the dry season or the rainy
7 season?

8 A. It was - it was coming close to the rainy season. But
9 it was not deep in the rainy season. It was at the end of
14:53:16 10 the dry season.

11 Q. Thank you. Sir, you have told us that you remember
12 when you were in Koidu Town when Foday Sankoh was arrested
13 on Spur Road. Was the Guinea operation before or after
14 that?

14:53:32 15 PRESIDING JUDGE: Guinea operation?

16 MR KOUMJIAN: Sorry, first of all it is not helpful anyway
17 because I'm in the wrong year. Excuse me, let me try
18 something else."

19 And then we come to the passage that we'd heard before. So
14:53:55 20 looking at that passage, we're talking about an event somewhere
21 towards the beginning of the rainy season which you've identified
22 to us in 2000. Now help us. At that time, Mr Taylor, what were
23 you engaged on?

24 A. If he's talking about the beginning of the rainy season in
14:54:15 25 2000?

26 Q. Yes.

27 A. Well, at this particular time in 2000 we are trying to
28 organise, if we're looking at May, the release of UN hostages
29 that are being held by the RUF.

1 Q. And help us, in May of 2000 what happens to Mr Sankoh?

2 A. To the best of my knowledge, Mr Sankoh is arrested around
3 that time.

4 Q. Because of?

14:54:43 5 A. Of the shooting incident, what occurred at Spur Road.

6 Q. Yes. And thereafter in order to have someone to speak to,
7 what are you and the other members of the Committee of Six
8 engaged on?

9 A. Major, major diplomacy trying to get the - because in fact,
14:55:10 10 the hostages are around this time. Trying to get them released
11 and we're busy trying to get to who in the RUF, if anybody, we
12 can talk to to get the process arranged.

13 Q. And what does that eventually lead to, who we should talk
14 to?

14:55:25 15 A. It leads to a decision to invite Issa Sesay to speak to
16 him.

17 Q. In?

18 A. Issa Sesay eventually is invited to come to Liberia in July
19 of - the first trip is around May/June, but he makes a second
14:55:45 20 trip in July of 2000,

21 Q. Right. Now, when he came, Mr Taylor, to Liberia, did you,
22 for example, say to him, "Look, I'm having a little local
23 difficulty with Guinea. Take the RUF out over there and sort
24 them out for me". Anything like that?

14:56:14 25 A. No, we were just so preoccupied with trying to get these
26 hostages and get to know who we could talk to in the RUF. There
27 was some - in fact, I would call it anxiety and also a little bit
28 of anger too on our part, and by "our" I mean ECOWAS. And so
29 that meeting with Issa Sesay was not a chat. It was a meeting

1 that was a very firm and strong meeting that he should release
2 the hostages, and in fact I was one of the first to come out with
3 a statement that we would not tie the release of the UN hostages
4 to the release of Foday Sankoh at the time. So it is not one of
14:56:56 5 those casual meetings that we are holding. I'm being very firm,
6 and I get a commitment from Foday - I mean, from Issa Sesay on
7 the process, first of all, of releasing the hostages. So this is
8 not anything to talk about cooperation or security. It's about
9 really delivering a strong message from ECOWAS that we wanted the
14:57:18 10 hostages released.

11 Q. And I'm helpfully assisted by Mr Anyah. Agreed fact number
12 34 reads as follows:

13 "Some time after the Lome Peace Agreement and Sankoh's
14 arrest and detention, Issa Sesay was appointed as the interim
14:57:36 15 leader of the RUF."

16 That's agreed fact 34. And 36:

17 "In May 2000, RUF abducted UNAMSIL peacekeepers in Sierra
18 Leone."

19 Now, Mr Taylor, the same witness goes on to say this about
14:57:56 20 this Guinea operation, page 14260 of the transcript of 21 August
21 2008:

22 "Q. Were any other - well, first of all, what forces were
23 you fighting against, the RUF? What forces were you
24 fighting against in this attack in Guinea?

14:58:18 25 A. We were fighting against the Guinean soldiers.

26 Q. Do you know what forces were what you called the NPFL
27 forces from Liberia? Who were they fighting against in
28 Gueckedou, if you know? If you don't, tell us that you
29 don't.

1 A. NPFL in Liberia, those were Charles Taylor's soldiers.
2 They were fighting against the Guinean soldiers. Those are
3 the Lansana Conte soldiers.

14:58:52 4 Q. Now, you said that the result wasn't good and you
5 talked about how some of the soldiers felt. Did that have
6 any effect on the RUF, that operation?

7 A. Yes, it affected the operation --

8 Q. Sorry, sir, my question is did the change in morale
9 affect the RUF when you came back to Sierra Leone?

14:59:11 10 A. Yes, because we did not go to Guinea in order only to
11 retreat again, but the conditions forced us to return. It
12 was not that the Guinean troops or the Guinean government
13 soldiers pushed us out of that place. We ourselves decided
14 to retreat."

14:59:28 15 Now, pause there. Mr Taylor, remember, this witness is
16 talking about beginning of the rainy season 2000. Was the NPFL
17 in existence then?

18 A. No, there was no NPFL.

19 Q. Because you note the witness says:

14:59:50 20 "Q. Do you know what forces were what you called the NPFL
21 forces from Liberia, who were they fighting?

22 A. NPFL in Liberia, those were Charles Taylor forces.
23 They were fighting against the Guinean soldiers."

24 Were your NPFL soldiers ever engaged in fighting against
15:00:11 25 Guinean soldiers, Mr Taylor?

26 A. There were no NPFL soldiers fighting Guinean soldiers.

27 Q. Was there ever a stage either during your time as leader of
28 the NPFL or later as President of Liberia when Liberian soldiers
29 were directly involved in fighting Guinean soldiers?

1 A. No, not directly. Our soldiers - Liberian soldiers, not
2 NPFL. Liberian soldiers, around 2001, did chase LURD
3 individuals, but not - there was no regular Guinean armed forces
4 personnel that we could attest to, no.

15:01:06 5 Q. So what do you say about the evidence being given by this
6 witness?

7 A. That's a total fabrication. I have no idea of what they
8 were doing in Sierra Leone or why - or if there was an operation
9 by the RUF in Guinea. I have no idea about what he's talking
10 about here. I'm not aware of what he's talking about.

11 Q. Very well. Now, another topic upon which the testimony of
12 this witness touched. Page 14264 of the trial transcript,
13 evidence of 21 August 2008:

14 "Q. Mr Witness, did you know - did Sam Bockarie have a
15 wife or any wives that you knew?

16 A. Yes, he had a wife.

17 Q. Did you know any of the family of the wife?

18 A. I know his - I know all of his family and his wife's
19 family.

15:02:19 20 Q. Since disarmament, did you ever see Sam Bockarie's wife
21 or any of her family in Sierra Leone?

22 A. I have never seen a wife after that, but I saw his
23 wife's elder sister and Sam Bockarie's younger brother.

24 Q. What was Sam Bockarie's wife's elder sister's name, or
15:02:45 25 what is her name?

26 A. Her elder sister's name is Kadie."

27 And it is spelt.

28 "Q. When was it that you saw Kadie?

29 A. It was in 2004 in Freetown.

1 Q. Did she tell you anything about what happened to her
2 sister?

3 A. Yes, both of them explained everything to me. I was
4 with them at the house for the whole day because they were
15:03:17 5 now my family members.

6 Q. And what did Kadie tell you about what happened?

7 A. When she came she told me that Sam Bockarie is dead and
8 Hawa too is dead, that is Sam Bockarie's wife, including
9 the children, Sam Bockarie's mother, Sam Bockarie's other
15:03:40 10 brother Mohamed. She said they are all dead. And I asked
11 who killed them? She said Charles Taylor, he gave the
12 order for them to be killed. That was what Kadie told me.
13 And Amara too, when I asked him, that was the same thing he
14 told me.

15:04:01 15 Q. Did Kadie tell you where she was when Sam Bockarie was
16 killed?

17 A. Yes, Kadie was staying with all of them in the same
18 house in Monrovia, but Kadie's husband was not staying in
19 that particular house, so she used to go and pass the night
15:04:22 20 over to her husband and in the morning she will come back.

21 So it was in the absence of Kadie that they came and
22 collected Hawa and others and they put them into a vehicle
23 and took them away. So Kadie was not present at the scene
24 that particular time.

15:04:41 25 Q. Okay. Did Kadie say how she got to Sierra Leone? Did
26 she travel openly, do you know?"

27 The learned judge asked Mr Koumjian to separate the two
28 questions, and so this question then follows:

29 "Q. Did Kadie tell you how she got to Sierra Leone?

1 A. Yes, she escaped. She escaped. She escaped her way
2 through Bo Waterside and entered Sierra Leone. "

3 Now, Mr Taylor, I appreciate it's hearsay, but,
4 nonetheless, I want you to have the opportunity of addressing it.
15:05:23 5 Did you give an order for Sam Bockarie to be killed?

6 A. No, I did not.

7 Q. Now, Mr Taylor, help us, because you appreciate, don't you,
8 that the clear suggestion is that you killed or ordered the
9 killing of Sam Bockarie in order to silence him because he had
15:05:56 10 too much insider knowledge about your dealings with him and so
11 you ordered his death. You know that's the case, don't you?

12 A. Yes, I know what they are thinking, yeah.

13 Q. What's your answer to that, Mr Taylor?

14 A. It is the silliest thing that I have heard. Look, let's
15:06:21 15 review the facts. What would Sam Bockarie have to say about me
16 or anything inside about me at this time? What would be, okay,
17 arms, diamonds, that he is supposed to be giving me diamonds to
18 buy arms, and that he is supposed to be following orders from
19 Foday Sankoh to deal with me as we've heard. But if this is

15:06:55 20 true, Foday Sankoh could have said - excuse me, Sam Bockarie
21 could have said all of this - all of this to Foday Sankoh, his
22 boss, when his boss returned from ordeal in 1999. Foday Sankoh
23 returns in 1999. Sam Bockarie writes a full report to him. This
24 salute report we've seen in this Court. We've read through it.

15:07:24 25 Except they were ungrateful people. Sam Bockarie could have said
26 in this report, "Oh chief, or Pa, whatever he called him, while
27 you were not here, Mr Taylor was very good to us. The diamonds
28 you told me to give to him, I did, and he supplied us arms and
29 ammunition and everything. "

1 Why wouldn't Sam Bockarie - what is there to hide again
2 that he could not have told his boss that I would have to kill
3 him many years later? I mean, I don't understand the logic, but
4 maybe this is the way how life is. It's impossible for this to
15:08:01 5 be as - you know, as you are proposing in your question. It's
6 not possible. There's no secret that Sam Bockarie would have -
7 at least that he would not have reported to his boss when he made
8 his salute report, when was that? About September/October of
9 1999, to my recollection. Why doesn't he tell Sankoh? Because
15:08:27 10 the accusation against me here is that I was taking diamonds from
11 them for arms, so what is there to hide about me? What is he
12 hiding? In Sankoh's footpath, what is he hiding? Footpath to
13 Democracy. What is he hiding? What is - this secret only comes
14 out, "You want Charles Taylor." So, "Oh, there was a deep
15:08:51 15 secret." Sankoh doesn't tell, even years later in Footpath to
16 Democracy, the book that he wrote, he doesn't acknowledge this
17 big assistance from Taylor. Sam Bockarie doesn't acknowledge it
18 in his salute report in 1999.

19 Q. Just pause for a minute, Mr Taylor. Let's just try and put
15:09:10 20 a time line to your answer. Remember, we've heard a moment ago
21 that following Sankoh's arrest in Nigeria - and we know that to
22 be 1997 - an order is given for the diamonds to be taken to you,
23 yes?

24 A. Yes.

15:09:35 25 Q. We know, as you've just told us, in September 1999, for
26 Sankoh's return, his battlefield commander prepares a salute
27 report, yes?

28 A. That is correct.

29 Q. In which you're not mentioned?

1 A. That is correct.

2 Q. And this is at a time when no indictment is being
3 contemplated. Can you think of any reason why he would omit such
4 a mention at that stage, Mr Taylor, in September 1999?

15:10:07 5 A. I see no reason why. As a good commander left on the
6 ground, he's obliged to inform - he's obliged to inform Sankoh of
7 whatever happened, because, don't let's forget, he has supposedly
8 been given an order.

9 Q. To do what?

15:10:22 10 A. To give me diamonds. So why doesn't he tell him then,
11 "Well, the order that you gave me upon your arrest in Nigeria, I
12 carried it out." It just doesn't happen.

13 Q. And then hold on a second. No mention of you in that
14 salute report in September 1999. A couple of months later, he
15:10:43 15 relocates to Monrovia.

16 A. Yes.

17 Q. What does he do after he relocates in Monrovia which would
18 give you a reason to kill him, Mr Taylor?

19 A. Absolutely nothing. There's absolutely nothing. He's
15:10:58 20 there - I'm helping him - going about his normal business.
21 Absolutely nothing. I don't know how they came up with this.

22 Q. No, help us, Mr Taylor, because this is a very serious
23 allegation being made against you that in order to effectively
24 cover your tracks, you ordered the killing of that man. You do
15:11:17 25 understand that, don't you?

26 A. I understand that.

27 Q. Now, help us. What was Bockarie doing in that two months
28 between the preparation of that salute report and his arrival in
29 Monrovia and thereafter which made you want to kill him? Tell

1 us.

2 A. Absolutely nothing that I can think about, because within
3 the two months between the salute report and his coming to
4 Monrovia in December of 1999, he is embroiled in the confusion
15:11:51 5 with his boss, Foday Sankoh, that we have to get involved and
6 force an issue to then go into disarmament and other things. So
7 there is nothing that he's doing with me. He is engrossed in a
8 conflict with his boss.

9 Q. Now, Mr Taylor, we don't want to go over the details of it
15:12:17 10 again, but after his arrival in Monrovia, do you recall us
11 looking at United Nations documents which spoke of concerns being
12 expressed by inter alia President Kabbah of Sierra Leone as to
13 his presence in Liberia?

14 A. Uh-huh.

15:12:41 15 Q. Do you recall that?

16 A. Yes, where some time later I learned that Kabbah is
17 concerned, yeah.

18 Q. And had his presence in Liberia attracted much
19 international attention?

15:12:58 20 A. Yes, yes. Everybody was aware and concerned, yes. It did
21 attract attention, yes.

22 Q. And help us, did that mean that to an extent there was a
23 spotlight on his presence in your country?

24 A. There was a spotlight. There was.

15:13:14 25 Q. And because, for example, whilst there he held press
26 conferences, didn't he?

27 A. Yes.

28 Q. Now, Mr Taylor, with so much public attention focused on
29 that man, why, as alleged by the Prosecution, did you give an

1 order to kill him?

2 A. I don't know why they went with the allegations on that
3 stand. I'm sure we'll probably get to know later, but I don't
4 understand it. I do not understand it. I do not understand it.

15:13:51 5 I do not. He meets in Liberia with officials from the United
6 States government. If there's anything - if he's threatened, he
7 would tell them. He meets with Jesse Jackson. He meets with
8 Howard Jetter, Assistant Secretary of State. He meets with the
9 UN special representative there. He's moving freely. If there's
15:14:21 10 anything that he's holding so secretly that he feels threatened -
11 all these diplomats, he's been meeting people, he's meet the
12 United States ambassador in Monrovia. I don't know what this man
13 would have that I would want to threaten his life, no.

14 Q. Now, another matter with this same witness. I'm looking at
15:14:47 15 page 14300 of the transcript of 21 August 2008:

16 "Q. How do you know that Charles Taylor told Johnny Paul
17 Koroma and his wife to move to Monrovia? How do you know
18 that?

19 A. It was Sam Bockarie who passed orders. At that time
15:15:15 20 Johnny Paul had no vehicle, that he was not on his own, and
21 he was not even brave to go out without an order. It was
22 Sam Bockarie who released them, Johnny Paul, his wife, his
23 bodyguards - his bodyguard, whom they called Rambo, and
24 others, and they took them along to Liberia, Monrovia.

15:15:35 25 Q. Now, with respect, that doesn't answer my question and
26 so let me try it again. How do you know that it was at the
27 request of Charles Taylor that Johnny Paul and his wife
28 moved to Monrovia?

29 A. I heard it from Sam Bockarie.

1 Q. Where?

2 A. In Buedu. Buedu. The headquarters was Buedu. When I
3 went, that was what Sam Bockarie himself told me. He was
4 saying it. He said it.

15:16:14 5 Q. Now, I'm being deliberately precise about this. What
6 was it that Sam Bockarie actually said to you? Try and
7 help us.

8 A. He said, 'Let him release' - Sam Bockarie said - at the
9 time we used to call Charles Taylor Father or Chief. He
15:16:32 10 said, 'Chief said he should release Johnny Paul and his
11 family for them to be taken along to him in Monrovia - in
12 Monrovia, Liberia. We hadn't anybody whom we called Chief
13 or Pa apart from Charles Taylor. He was the only person
14 who was our Papa and our everything.

15:16:54 15 Q. Now, I'm still trying to clarify your account about
16 this. That's why I want to ask you this question: Who are
17 the West Side Boys?"

18 Now, Mr Taylor, when did you first meet Johnny Paul Koroma?

19 A. I first met Johnny Paul Koroma in August of 1999.

15:17:22 20 Q. In what circumstances?

21 A. Following my successful negotiation for the release of some
22 UN and other hostages - this is another hostage situation -
23 being held by the West Side Boys and their demand that their
24 leader, who was being - who had been incarcerated by the RUF,
15:17:55 25 Johnny Paul Koroma, that they would not release those
26 individuals. I, under the auspices of ECOWAS, negotiated the
27 release of Johnny Paul Koroma in order that the UN and other
28 officials would be released that were being held by the West Side
29 Boys at Okra Hills.

1 Q. Right. How did you go about securing his release?

2 A. By this time I spoke both to Foday Sankoh and to Sam
3 Bockarie. I spoke to Foday Sankoh, who had not come into the
4 region yet, but I was in telephone conversation because we were
15:18:45 5 trying to push him to hurry up and come. And after that I spoke
6 directly to Sam Bockarie and told him that we could not have this
7 situation of United Nations individuals being held hostage. And
8 by the way, there were some RUF people, officials, who were also
9 being held amongst the group that the West Side Boys took, and I
15:19:15 10 told him that I asked - in fact, up until that time I didn't even
11 know - and I don't think a lot of people knew - that Johnny Paul
12 Koroma was actually imprisoned at that time. I really didn't
13 know. So we agreed that he would release Johnny Paul Koroma,
14 because the West Side Boys had said they would not release the
15:19:32 15 hostages until Johnny Paul Koroma was released.

16 Q. And when he was released, Mr Taylor, was he released alone
17 or with anybody else?

18 A. Along with that release were two other persons. The former
19 and late President Momoh was set free - well, I'm not sure if
15:19:54 20 Momoh was incarcerated, but he was let go at the time. He went
21 into Guinea. There was another guy that I had never met, but
22 most people in West Africa years ago had heard his name a lot.
23 There was a gentleman, a Sierra Leonean called Hilton Fyle. I'm
24 not sure if it's F-I-L-E-S or what, but he was a - ge worked some
15:20:16 25 time for the BBC. He also left during that time of the release
26 through Guinea. Hilton Fyle.

27 Q. So who was it who released Johnny Paul Koroma?

28 A. The RUF and Sam Bockarie on the ground up there at that
29 time that released Johnny Paul Koroma.

1 Q. How did Johnny Paul Koroma get from a position of
2 incarceration in Sierra Leone to Monrovia?

3 A. Oh, I am not too sure of what modalities were used inside
4 Sierra Leone. I'm not sure, but I know we picked him up at the
15:20:56 5 border. If I'm not mistaken, I think he was driven to the border
6 and then on to into Liberia, to the best of my recollection.

7 Q. And help me, when he arrived in Monrovia was he alone or
8 with anybody else?

9 A. He arrived with some individuals, a few security personnel,
15:21:15 10 his wife, I don't know the exact number.

11 Q. His who?

12 A. A few of his security personnel.

13 Q. And his?

14 A. I think his wife came along with him, if I'm not mistaken.

15:21:25 15 Q. Any other family members?

16 A. I'm sure there were others, but I did not meet them. I
17 don't know the exact amount, but I know that he came with an
18 entourage.

19 Q. Right. Now this witness, Mr Taylor, let's just remind us
15:21:46 20 of what he says:

21 "Q. How do you know that Charles Taylor told Johnny Paul
22 and his wife to move to Monrovia? How do you know that?

23 A. It was Sam Bockarie who passed orders. It was Sam
24 Bockarie who released them.

15:22:02 25 Q. How do you know it was at the request of Charles Taylor
26 that Johnny Paul and his wife moved to Monrovia?

27 A. I heard it from Sam Bockarie in Buedu. He said Chief
28 said he should release Johnny Paul and his family for them
29 to be taken along to him in Monrovia. In Monrovia,

1 Liberia, we hadn't anybody whom we called Chief or Pa apart
2 from Charles Taylor. "

3 So let's break that down. Firstly, did you tell Bockarie
4 to release Johnny Paul Koroma?

15:22:36 5 A. Yes, I asked him to release Johnny Paul Koroma, yes.

6 Q. Why what means did you communicate that to Sam Bockarie?

7 A. I spoke to Sam Bockarie on the telephone.

8 Q. Why did you say that to him?

9 A. Because we wanted to get the UN and other Sierra Leonean
15:22:52 10 officials and NGO individuals released that were being held
11 hostage by the West Side Boys.

12 Q. But here this witness makes no mention of that purpose,
13 Mr Taylor. The witness says, in effect, you gave an order for
14 Johnny Paul Koroma to be released, but makes no mention of why.

15:23:15 15 Can you help us with that?

16 A. Well, that's the - you know, that's the whole problem with
17 this whole ordeal of mine. You've got people who don't know
18 what's going on, and you ask them a question and they go running
19 off with - obviously, if there is anyone of importance in the RUF

15:23:41 20 at that time who is claiming to be close to Sam Bockarie who does
21 not know that there is a major problem going on at that time
22 where the West Side Boys are raising all kinds of red fire - they
23 are down in Okra Hills and there is trouble amongst them. If he
24 doesn't know this then, I mean, I wonder if they ever know what's

15:24:06 25 going on. They really don't know, and so you ask them questions,
26 they just go - he sees Johnny Paul Koroma coming to Monrovia and
27 he doesn't know - of course he gets an order, because the order
28 must come from Sam Bockarie, so he just begins to talk: Oh, Sam
29 Bockarie ordered to - he doesn't know and really doesn't care, I

1 guess, to know what's going on. Just like many of these cases -
2 people in our region, some people behave this way. They don't
3 know things. They hear it and they take their own angle, or even
4 they even hear an announcement on the radio and take it their own
15:24:45 5 way. This is not unusual for people in these categories. If he
6 cannot say here, "Oh, we released him because of the West Side
7 Boys situation," then I wonder how much he really knows about
8 what he's talking about. That's all I can say here.

9 MR GRIFFITHS: Can I pause for a spelling break,

15:25:04 10 Mr President. Hilton Fyle, H-I-L-T-O-N F-Y-L-E.

11 Q. Now, the same witness goes on to say, Mr Taylor, in answer
12 to questions from me at page 14962 of the transcript:

13 "Q. Now, is it right that in 1992 you went to Kono with
14 Foday Sankoh for about a month?

15:25:53 15 A. Yes, sir.

16 Q. Why?

17 A. At that time I was a bodyguard. That was why I went
18 with him. Anywhere he went to, I went with him.

19 Q. What is Top 20?

15:26:09 20 A. The name Top 20 came about when our brothers who came
21 from the NPFL to help us during the war - that was the name
22 that was given, Top 20. That means they were the bosses.
23 They were above us. That was what I understood from that
24 name.

15:26:29 25 Q. And what does Top 40 mean?

26 A. Okay. Top 40. When they had ran the Top 20, it got to
27 a point in time when their boss stopped them and it was
28 after some time that they ran the Top 40 again. There were
29 three stages, Top 20, Top 40 and Top Final.

1 Q. And when you - I'm sorry, but I don't understand that.
2 'When their boss stopped them', what does that mean?

3 A. The bad things that they used to do when they used to
4 kill innocent people. They used to beat up innocent
15:27:10 5 people. They had one of their boss, so the complaint went
6 to Foday Sankoh, but they did not use to listen to him.
7 They did not take orders from him. They said he was not
8 their commander. But he, Foday Sankoh, also had his own
9 boss that he used to take his complaints to. That was
15:27:34 10 Charles Taylor. So Charles Taylor ordered the commander
11 that was the boss of all the NPFL who were with us to stop
12 them and then he stopped them and he called all of them,
13 those bad ones - he called on all of them to go. So those
14 ones who were good and kind, he asked them to stay.

15:27:58 15 Q. Who is he?

16 A. I said the commander who was in charge of the NPFL
17 soldiers who were with us at the time. That is what I
18 mean. He was called upon to move from there because he did
19 not control the soldiers whilst they were doing these
15:28:15 20 wicked things.

21 Q. What is the name of the commander?

22 A. He was called Pa Jean. But his nickname was Kanneh
23 Hill. He was called Pa Jean.

24 Q. And who withdrew that commander from Sierra Leone?

15:28:40 25 A. Charles Taylor. "

26 Mr Taylor, do you understand that account given by the
27 witness?

28 A. I know what he's trying to talk about, but he sounds like
29 somebody that was not sure about what he had heard himself,

1 because the mention of Top 20 and Top 40 and Top Final in the
2 context that I know it, there's a different context. So I
3 don't --

4 Q. In what context do you know it?

15:29:19 5 A. Well, I just know the Top 20, Top 40 and Top Final as the
6 names of operations that were carried out by Sierra Leoneans
7 against our special ops people in Sierra Leone. And after that
8 fight, that they had complained about them carrying out
9 atrocities in Sierra Leone, Foday Sankoh had complained about it,
15:29:40 10 and we withdrew them. So I don't know how he explains that.
11 Maybe he doesn't really know - here he may explain it in a
12 different way. But my understanding about this, these were names
13 of operations.

14 Q. Now, Mr Taylor, do you accept that following Top Final, you
15:30:00 15 gave an order for NPFL forces to withdraw from Sierra Leone?

16 A. Every last one, yes.

17 Q. And when did you give that order?

18 A. That's May of 1992 I gave those orders and sent - and had
19 them withdrawn, yes.

15:30:16 20 Q. Now, help us. Here we have again this name Pa Jean. Do
21 you know such an individual?

22 A. No, I really don't know this Pa Jean because the commander
23 at the time was not this name. This name doesn't ring a bell to
24 me.

15:30:37 25 Q. Now, who was the commander of NPFL forces in Sierra Leone
26 at the time when you told them to withdraw?

27 A. The commander was a man called Sam Tuah.

28 Q. Sam Tuah?

29 A. Tuah, yes.

1 Q. Did he have the nickname Pa Jean?

2 A. No, no, no. Not to my knowledge. I doubt it because - I
3 doubt it.

4 Q. Did he have the nickname Kanneh Hill?

15:31:06 5 A. No, no.

6 Q. Do you have any idea where this witness might have got
7 those names from?

8 A. It's possible that who he's referring to could have been
9 one of the members of that unit, but I don't know this particular

15:31:18 10 person. I'm just surmising on that. This could have been

11 someone in the unit, but I knew the commander because that was a
12 special ops - a special operation that was being carried out, so
13 I knew the commander, Sam.

14 Q. Let's continue:

15:31:36 15 "Q. What was the name of the commander?

16 A. He was called Pa Jean, but his nickname was Kanneh
17 Hill. He was called Pa Jean.

18 Q. And who withdrew that commander from Sierra Leone?

19 A. Charles Taylor.

15:31:49 20 Q. Now, what is Top Final?

21 A. Top Final, those same fighters, you know, it was on the
22 border, there is no river between Liberia and Sierra Leone
23 on that side, you can even walk across. The soldiers who

24 went at that same area who were doing the wicked things in

15:32:10 25 those areas, who were killing people, and because they had

26 asked them to withdraw, they were angry about it. The

27 issue of Charles Taylor asking them to withdraw, they were

28 angry about it. So they just went on doing wicked things.

29 If you were a woman, they would rape you. If you were a

1 young boy, they would beat you up or sometimes kill you.

2 So that was the time the infighting happened between the

3 RUF and the NPFL. That was what they referred to as Top

4 Final and that was to finally flush out the bad ones and

15:32:49 5 that only the good ones were supposed to remain. So that

6 was the time they resorted to that Top Final. All the bad

7 ones were supposed to be flushed out and the good ones

8 remain, so that was the name given to it.

9 Q. And so it was Charles Taylor who had asked them to

15:33:07 10 withdraw from Sierra Leone?

11 A. Yes. Foday Sankoh at so many times took the complaints

12 to him, so he too at a point in time asked the boss to move

13 from there. But the soldiers who were there with him on

14 the ground, they did not want to withdraw because

15:33:30 15 Charles Taylor himself did not have time to come there and

16 to ask them there to withdraw, so it was violence - it was

17 only violence that would have flushed those bad ones out.

18 Q. And thereafter, if I understand what you're telling us,

19 the RUF was effectively on its own?

15:33:46 20 A. The RUF was under the command of Foday Sankoh backed by

21 Charles Taylor. We were not on our own. We only resorted

22 to flushing out the bad ones so that they will return to

23 where they came from."

24 Now, you do accept, Mr Taylor, giving the order to

15:34:11 25 withdraw?

26 A. Yes, I do.

27 Q. Having given that order, did you provide any further

28 "backing" to the RUF?

29 A. None whatsoever. The bad blood - there were a lot of our

1 people too that got killed and there was bad blood at that
2 particular time.

3 Q. Bad blood between whom?

4 A. Between the RUF and the NPFL. Even within the border area
15:34:35 5 following the withdrawal, there were always problems. There was
6 no assistance, no cooperation. There was just terrible,
7 terrible, terrible anger between the groups. None. I was upset
8 personally because I felt that Foday Sankoh could have stopped it
9 if he wanted to.

15:34:53 10 Q. How?

11 A. Well, he was on the ground when this happened. He could
12 have stopped it. But I think it was something that they all had
13 just - I'm not sure if he participated, but I just felt that if
14 something like that had happened in our area, we would have
15:35:09 15 stopped it, and so I didn't really want to hear or talk about
16 anything beyond that particular point. I sent one of our top
17 generals, we withdrew our men and that cut the cord as of that
18 day.

19 Q. Now, the witness goes on:

15:35:36 20 "Q. So help us with this then: Do you recall that in
21 about April/September 1991 ULIMO was formed in Guinea and
22 Sierra Leone by former Liberian army fighters, Krahn and
23 Mandingo supporters of the late President Doe, do you
24 remember that?

15:35:53 25 A. Yes, I knew that ULIMO was formed in Sierra Leone by -
26 and it was formed by the remnant Krahn and other people."
27 And then the witness goes on, question, page 15023, line 6:
28 "Q. Did you go to Monrovia with Sam Bockarie before you
29 were appointed mining commander in December 1998?

1 A. Yes, that's what I spoke about. When we left Freetown,
2 I went to Monrovia.

3 Q. And it was before you were appointed mining commander?

4 A. Yes, we left Freetown first before I became the mining
15:36:57 5 commander.

6 Q. And then you went on to tell us how you stayed at a
7 place at ELWA Junction?

8 A. It was not ELWA, E-L-W-A. There was no ELWA Junction
9 in Monrovia.

10 Q. E-L-W-A Junction, that's where you stayed with Sam
11 Bockarie?

12 A. It was not stay. We just passed the night."

13 Now, pause again, Mr Taylor. The witness is saying

14 December 1998, they past a night at an address at ELWA Junction,
15:37:46 15 yes?

16 A. Yes, I see what he says there.

17 Q. Now, let us just remind ourselves. Bockarie comes to
18 Monrovia for the first time in September 1998?

19 A. That is correct.

15:37:59 20 Q. Do you accept that Bockarie also comes to Monrovia in
21 December 1998?

22 A. That is correct.

23 Q. When he came in December 1998, for what purpose did he
24 come?

15:38:16 25 A. Actually, that's going into November/December, he was
26 passing through Liberia to go to meet with the chairman of the
27 OAU.

28 Q. On that occasion, Mr Taylor, where did he stay in Monrovia?

29 A. At the guesthouse.

1 Q. Did he stay at ELWA Junction?

2 A. There's no reason why he would have stayed there. No, he
3 did not stay at ELWA Junction. There's nothing - there's no
4 hotel at ELWA Junction. There's nothing there. He stayed at the
15:38:45 5 guesthouse that was provided for him.

6 Q. "Q. Now what was the purpose of Sam Bockarie's trip to
7 Monrovia?

8 A. When we went to Buedu, it was when Sam Bockarie said he
9 had received a message that Charles Taylor had invited him
15:39:05 10 to Monrovia, Liberia, but it so happened that the two of us
11 would go. I was to go and stop in Voinjama for this same
12 negotiati on. There was a police commander in Voinjama at
13 that time, he was a Gio man, but I have forgotten his name
14 - and so I travelled together with him and we went to

15:39:29 15 Monrovia and we returned. That was the mission I went on
16 for Voinjama, but when I went and he explained to the
17 police commander, he said he was going to leave me there to
18 be running in between. After that explanati on he spoke to
19 the commander and then I went with him to Monrovia, because
15:39:53 20 even the times that I used to go to buy the ammuni tions, I
21 did not just go there alone. He would go first and
22 introduce me before I continued going to buy the ammuni ti on
23 later.

24 Q. Can we now try my questi on. What was the purpose for
15:40:12 25 you and Sam Bockarie to go to Monrovia?

26 A. That's the reason that I have explained to you. I
27 travelled with him to go to Voinjama to make the same
28 arrangement that we had made in Foya, because the police
29 commander that was in Voinjama, I did not know him. He

1 knew them. He went with me to introduce me to the police
2 commander, but then after that arrangement, I followed him
3 to Monrovia. The two of us went. So when we came back now
4 to Buedu, then he had already introduced me to the police
15:40:51 5 commander in Voinjama. So afterwards he sent me along to
6 the place, he gave me some money and I went there on the
7 mission, but I wouldn't have gone there on my own without
8 him introducing me first.

9 PRESIDING JUDGE: Mr Witness, we understand that, but the
15:41:11 10 question is why did you and Sam Bockarie go to Monrovia?
11 You're talking about Voinjama now.

12 THE WITNESS: Yes, I travelled with him to Monrovia because
13 Charles Taylor had invited him. I didn't know why he was
14 invited, but Charles Taylor invited him and we went there,
15:41:36 15 and even when we went, we were at the house when Benjamin
16 Yeaten invited him at night and they went out at night.
17 When he returned, that was when he told me and then both of
18 us returned.

19 MR GRIFFITHS:
15:41:58 20 Q. I just want to be clear about this because I'm failing
21 to understand your answer. Are you saying that the only
22 reason you and Sam Bockarie went to Monrovia on that
23 occasion is because Charles Taylor had invited him? Is
24 that your evidence?

15:42:14 25 A. Yes, that's what he told me. He said Charles Taylor
26 invited him. That's why I went with him to Monrovia.

27 Q. Okay. And that was the only reason why you went?

28 A. No, that was not the only reason.

29 Q. What other reason was there? That's what I've been

1 asking for the last five minutes. What other reason was
2 there?

3 A. The two reasons were the ones I have told you. The one
4 is Voinjama, and the other is I travelled with him to
15:42:53 5 Monrovia because he did not go with any senior officers, so
6 I went with him with his bodyguards. Those were the two
7 reasons."

8 Now, Mr Taylor, when Sam Bockarie came to Monrovia in
9 December - before December 1994 --

15:43:23 10 A. 8.

11 Q. 1998, sorry. Was it always at your invitation?

12 A. No, not always, no. Sometimes if he wanted to come, he
13 would request. Like, in this case he was requesting to go
14 through.

15:43:42 15 Q. So specifically when Bockarie, in, you tell us,
16 November/December 1998, travelled to meet with the leader, the
17 chairman of the OAU, did you invite him, or did he request
18 permission to travel via Monrovia for that visit?

19 A. He requested permission to travel via Monrovia for that
15:44:08 20 visit.

21 Q. And help us, Mr Taylor. Who knew that he would be making
22 such a trip?

23 A. I would say almost everybody on the committee knew,
24 including the United Nations. Everybody thought it was a good
15:44:21 25 idea, because earlier a decision had been taken for some of the
26 senior personnel in the RUF and others to be able to travel.
27 Yes, they were very aware.

28 Q. Now, another matter --

29 A. But may I just - here, counsel, this other reason in

1 Voi njama, apparently there is an ammunition deal, I can see here
2 that he's mentioning. Okay, he said the first - one of the
3 reasons were apparently, if I'm understanding this correct - so
4 there was another underground motive that they were arranging,
15:45:19 5 apparently, to buy ammunition in Voi njama also.

6 Q. And the witness also said that's why Bockarie - let's just
7 remind ourselves of his own words. Page 15024:

8 "A. That's the reason that I have explained to you. I
9 travelled with him to go to Voi njama to make the same
15:45:49 10 arrangement that we had made in Foya, because the police
11 commander that was in Voi njama, I did not know him. He
12 knew them."

13 "He" being Bockarie, do you follow?

14 A. Uh-huh

15:46:08 15 Q. Now, let's pause and examine that. Mr Taylor, we're
16 talking about 1998 now?

17 A. That is correct.

18 Q. The police commander in Voi njama, any idea who that would
19 be?

15:46:20 20 A. No, I can't recall who that would be, no.

21 Q. Now, this is the area that was former ULIMO territory, you
22 tell us?

23 A. That is correct.

24 Q. But by this ULIMO have disarmed?

15:46:34 25 A. Yes, yes.

26 Q. And we've spent a little time discussing the state of
27 affairs in Lofa, yes?

28 A. Yes.

29 Q. Now, do you recall mention in that salute report prepared

1 by Sam Bockarie that after the departure of the leader he had
2 used the monies left by the leader to make contact with ULIMO?

3 A. That is correct.

4 Q. And initially they were suspicious of him and arrested him.
15:47:06 5 Do you remember that?

6 A. Yes. Very well, yes.

7 Q. And thereafter, having reassured them, a mutually
8 beneficial trade was set up. I paraphrase, but do you recall
9 that from the salute report?

15:47:22 10 A. Very much. Yes, I do.

11 Q. Now, look at what this witness is saying. He, that being
12 Bockarie, knew them. What do you understand by that, Mr Taylor?

13 A. These are just his old contacts that were still in that
14 area, and he says above that that they will make an arrangement,
15:47:38 15 he says, to buy ammunition. You see further up there he says,
16 "Actually, I used to go to buy the ammunition. I did not just go
17 there alone." So they were trying to use their old contacts to
18 buy ammunition. They had made arrangement, apparently, in Foya
19 and now they were trying to make arrangements in Voinjama.

15:47:59 20 Q. But, Mr Taylor, you're supposed to be the one who's
21 supplying the arms?

22 A. I'm not. That's why they are busy hustling - buying from
23 the same ULIMO people that they knew before. Why would Sam
24 Bockarie be coming to me to Monrovia, and I'm supposed to have
15:48:15 25 arms and giving it to him, and he's busy in Lofa buying arms? I
26 don't have any arms to give Sam Bockarie.

27 Q. Well, according to the witness, he stops in Lofa to make
28 the deal before he comes to Monrovia, Mr Taylor?

29 A. So what is he coming to Monrovia for, if I'm supposed to be

1 giving him his arms and ammunition? I don't have it. So the
2 whole argument that we heard even before now that Sam Bockarie is
3 coming and being supplied ammunition, I mean, this even states
4 here now that - if you are getting ammunition for free or
15:48:46 5 whatever, why are you buying undercover surreptitiously in Lofa?
6 It's simply because there's no ammunition in Monrovia. That's
7 the way I read into this, and that's why they're making
8 arrangements with their old contacts to get whatever they have.

9 Q. Because when we go now to page 15070 of the transcript:

15:49:21 10 "Q. I'm asking you if at any time, except the period when
11 you were in Freetown with the junta, were their ports,
12 places where ships could come to bring ammunition to the
13 RUF? Could you get ammunition from ships except for the
14 junta period?

15:49:41 15 A. Beside the time we were in Freetown, we did not get
16 access for that because the areas where we were in our
17 zone, there weren't seas from which we could get that
18 opportunity. We either got ammunition from the ULIMO that
19 we bought, or from Charles Taylor, but we did not have the
15:50:10 20 kind of contact that we will get ammunition from outside
21 countries, no.

22 Q. Did Superman have any contacts other than the ones
23 you've just mentioned, Liberia, or purchasing from ULIMO in
24 Liberia? Any other ways to get ammunition other than from
15:50:31 25 Sam Bockarie or from these other sources?

26 A. No, the place where Superman was was in the middle of
27 the country, in the centre of the country. He was not
28 close to a border line. There was no other way for him
29 to make contact for ammunition, except when he will get up

1 some days and then go and attack and fight, and then he
2 will capture ammunition and sometimes he will get some
3 ammunition from Sam Bockarie. So that was it."

4 Now, again clear reference to the purchase of arms - well,
15:51:13 5 ammunition from ULIMO.

6 A. Uh-huh

7 Q. Now, the final reference I invite your attention to,
8 Mr Taylor, is this. Page 15072 of the transcript of 1 September
9 2008, answer at line 17:

15:51:51 10 "A. From the beginning when I joined the RUF, those of us
11 who were trained, we were all brothers, and even the women
12 who were with us, we were all brothers and sisters and we
13 had those who were ahead of us who controlled us and at the
14 time they showed us, Rashid Mansaray, Mohamed Tarawalli.

15:52:11 15 The two of them came from Libya. And Pa Sankoh, he told us
16 that Charles Taylor was his brother and they were two who
17 came from Libya, together with those other men and they
18 came. Those were our fathers. But those of us who were
19 trained together, we were brothers and sisters in the RUF

15:52:36 20 and the NPFL. Those of us who had weapons who were
21 fighting, we were like a family. So that was the
22 understanding we had. So anybody who left Liberia at a
23 point in time and came to Sierra Leone, he or she was our
24 brother or sister and anybody who left Sierra Leone to go
15:52:58 25 to Liberia at that point in time, he or she would be
26 considered a brother and sister over there. So that was
27 what used to happen.

28 Q. Okay. My question, Mr Witness, is in that family, was
29 there a single leader of the family or more than one leader

1 of the family?

2 A. Yes, for that family we had two leaders, Sankoh and
3 Charles Taylor. They were the leaders for that family that
4 we had. They were controlling us.

15:53:31 5 Q. Can you describe the relationship between Foday Sankoh
6 and Charles Taylor in that family?

7 A. Between the two of them the family relationship was
8 cordial. I never came across an argument between the two
9 of them. I never saw that. Maybe it might have happened,
10 but in my absence."

15:53:51 10
11 Was it cordial, Mr Taylor?

12 A. Well, for a brief period there was a cordial relationship
13 between Sankoh and myself. Up until we got to the point of the
14 attitude in '92 against my men, I would call it cordial.

15:54:22 15 Q. And after '92?

16 A. Very, very, very bad. There was no contact, no speaking,
17 no relationship, nothing.

18 Q. From when until when?

19 A. From after May of 1992, the next time I spoke or saw Foday
15:54:44 20 Sankoh was in 1997 when I met him in Lome.

21 Q. 1997?

22 A. July. Excuse me, 1999. Excuse me.

23 Q. When?

24 A. 1999, July.

15:55:04 25 Q. And during that period from '92 to '97, how would you
26 describe your relationship with Sankoh?

27 A. '97 or '99?

28 Q. '92 to '99?

29 A. '99, yes.

1 Q. How would you describe it?

2 A. Well, there was not a relationship. So there was just no
3 contact, no relationship, nothing. I had not spoken to him. I
4 would call it a very, very bad - very, very, very bad
15:55:37 5 relationship.

6 Q. That's what I'm asking: On what terms did you part?

7 A. On a very angry term and a very angry note.

8 Q. And what was the reason for that anger?

9 A. Because he had sat there, in my opinion, and permitted a
15:55:54 10 lot of our soldiers to be killed when he could have prevented it
11 after our discussion about my action that I would have taken by
12 withdrawing the men. He knew that it was contemplated that the
13 men would be withdrawn, and he permitted this to happen, and some
14 of our good soldiers were lost, and I was very upset that he sat
15:56:18 15 there and permitted the mayhem.

16 Q. What mayhem, Mr Taylor?

17 A. A lot of boys got - this Top 20, Top 40, a lot of our
18 people got killed in Sierra Leone. A lot of our boys got killed.
19 Not just the fighters, but some of them had been there, they had
15:56:34 20 - some of their friends used to visit. Some innocent people,
21 even innocent Sierra Leoneans died, and I felt that that was very
22 irresponsible of him to permit that, and I didn't want to be
23 bothered with him beyond that.

24 Q. Right. We're going to move on from that witness now and I
15:56:58 25 want to --

26 PRESIDING JUDGE: Yes, Ms Hollis.

27 MS HOLLIS: And, again, just for the record, the
28 Prosecution would object to aspects of the examination regarding
29 to this prior witness that have been mischaracterised, in our

1 view, and we will deal with it on cross-examination, but I simply
2 wish to make a record for that.

3 PRESIDING JUDGE: Yes, your objection is on record,
4 Ms Hollis.

15:57:23 5 MR GRIFFITHS:

6 Q. Next witness, Mr Taylor, TF1-567. Now, again, Mr Taylor,
7 we are not going to mention any names, okay?

8 A. Okay.

9 Q. So we need to proceed with care, okay?

15:57:53 10 A. Yes.

11 Q. Now, this particular witness, at page 12829 of the
12 transcript, 2 July 2008, speaks of being employed as a guard of
13 Foday Sankoh's mansion in Pendembu, okay?

14 A. Uh-huh.

15:58:35 15 Q. "Q. How long did you serve as a mansion guard?"

16 A. We were there as mansion guards for a long time.

17 Q. During what year or years were you there as a mansion
18 guard?

19 A. In 1991.

15:58:56 20 Q. During the time you were there as a mansion guard, was
21 Foday Sankoh doing any travelling away from Pendembu?

22 A. Yes, during the time I was there as a mansion guard,
23 Foday Sankoh sometimes left us there and travelled.

24 Q. Did you know where he went?

15:59:20 25 A. He told us that he was going to Gbarnga in Liberia.

26 Q. Did he tell you why he was going to Gbarnga in Liberia?

27 A. He told us that he was going to see his brother,
28 Charles Taylor, and he brought arms and ammunition together
29 with food."

1 Pause there. Now, year 1991, Mr Taylor, were you aware of
2 Foday Sankoh having a mansion based in Pendembu?

3 A. No, I was not aware of that, no.

4 Q. In 1991, were you still providing support to Foday Sankoh?

16:00:12 5 A. Yes, late 1991, yes.

6 Q. So when the witness speaks of Sankoh going to Gbarnga and
7 coming back with arms and ammunition and food in 1991, do you
8 dispute that?

9 A. I do not dispute that, but with these people, you don't
16:00:35 10 know what time he's talking about. I want to put for the
11 records, if he's speaking about from August 1991 to December,
12 yes, but it's very difficult to tell what time he's talking
13 about. There is the going into Gbarnga as of August of 1991 by
14 Foday Sankoh and he buys things - because Gbarnga is a
16:01:02 15 flourishing city. It doesn't mean he's coming for me. But you
16 don't know what time they are talking about here. They just
17 throw everything out. But I accept that in late 1991, for the
18 records, Foday Sankoh does come to Gbarnga and does go back at
19 least two or three times or so.

16:01:22 20 Q. Now, Mr Taylor, you just mentioned that Gbarnga is
21 sovereign city?

22 A. No, I said it's a flourishing city.

23 Q. And you can buy things. What do you mean by that?

24 A. There are huge businesses. Lebanese have long had
16:01:52 25 businesses. Gbarnga serves as the crossroad, almost the centre
26 point of Liberia. It is from Gbarnga that you go towards the
27 southeast, you can come to Monrovia. It is considered a central
28 point. And long before the war and for many years, they've had
29 huge businesses, business shops, Lebanese and other - in fact,

1 one of the largest Catholic missions in Liberia is located in
2 Gbarnga. It's a flourishing city where you can purchase almost
3 anything you want.

16:02:33 4 Q. Now, you said "where he may purchase", Sankoh may purchase.
5 Was he purchasing stuff in Gbarnga?

6 A. Sometimes when Sankoh came to Gbarnga, some of the stuff he
7 carried in terms of non-military things, I didn't give him all of
8 them, some of them he bought. Some of them he bought on his own.
9 He went to the shops and he bought things. I didn't give him
16:02:55 10 some of the stuff. When it comes to the little ammunition and
11 arms, yes, I gave it. But a lot of the other stuff he --

12 Q. Other stuff like what?

13 A. Like sandals and sneakers and T-shirts and different
14 things, he bought them from the Lebanese businesses in Gbarnga.

16:03:14 15 Q. So when, for example, this witness speaks of Sankoh going
16 away and coming back with items, does it follow that not
17 necessarily all of them may have come from you?

18 A. Definitely. Not all of them came from me, yes. Sankoh did
19 a lot of purchasing on his own.

16:03:37 20 Q. How do you know that?

21 A. Well, when the trucks - when Sankoh came, some of our
22 people went with him in town. Businesses, I mean, flourished.
23 In fact, drug stores, he bought drugs for his people. So a lot
24 of the things that, in fact, we didn't have, he bought them on
16:03:55 25 his own, yeah.

26 Q. Now, when you say trucks, Mr Taylor, that's a word which
27 has been used frequently in this Court. What do we mean when
28 we're talking about trucks?

29 A. Well, when Sankoh came, he would bring a truck. In our

1 part of the world, when we talk about a truck, this has got to be
2 any - at least a six-wheel - six-tyre vehicle that would take at
3 least 10 tons we would call a truck. Now, in America, it's a
4 little different because a truck in America can be - a jeep, they
16:04:37 5 will call a truck. But on our side, when we talk about a truck,
6 it's at least six tyres that can take about, I would say, 10
7 tons.

8 Q. And did Sankoh used to come to Liberia with such vehicles?

9 A. Not vehicles. And I want I want to cut that "S" from the
16:04:57 10 trucks. He would come with a truck and another vehicle, yes. He
11 would come with a truck.

12 Q. Now, the witness goes on:

13 "Q. During the time you were at the mansion as a mansion
14 guard, do you know what the chain of command was for the
16:05:11 15 RUF in Sierra Leone?"

16 Bear in mind the witness is talking about '91:

17 "A. Yes.

18 Q. Please tell us.

19 A. Well, at that time it was General Samuel G Tuah who
16:05:30 20 controlled the movement at that time and he was an NPFL."
21 Is that true or false?

22 A. I remember I mentioned Sam Tuah. Sam Tuah was the
23 commander of our special ops people that went to Sierra Leone.
24 That's why I'm saying, we've got to be careful. These boys just
16:05:50 25 throw things out now. The time for me would be important of what
26 he's talking about, okay. Because once he mentions Sam Tuah, who
27 was the commander, he has to be talking about after August of
28 1991.

29 Q. "Q. And at this time, to your knowledge, who was in

1 control of the front line areas?

2 A. Well, it was the NPFL commanders.

3 Q. If you know, at this time how many NPFL were in Sierra
4 Leone?"

16:06:30 5 Now, can you help us with that, Mr Taylor? How many NPFL
6 were in Sierra Leone after August 1991?

7 A. I would put it to about two companies. That would be, I
8 would say, close to 300-350 men. About two companies.

9 Q. Now, let's go to another aspect of the witness's evidence.

16:07:11 10 Page 12838 of the transcript, 2 July 2008:

11 "Q. Did you ever travel with him?

12 A. Yes.

13 Q. Where did you go with him?

14 A. The first trip that I made with him, Foday Sankoh and I
16:07:32 15 travelled to Liberia.

16 Q. How many trips to Liberia did you make with Foday
17 Sankoh?

18 A. In 1991 I travelled with him once. In '92 we travelled
19 again.

16:07:51 20 Q. And were those the only trips that you made with him to
21 Liberia?

22 A. I can't recall.

23 Q. Where did you travel to in Liberia?

24 A. When we left Pendembu, we went - we travelled to
16:08:06 25 Kailahun. From Kailahun, Buedu to Koindu. From there we
26 went to Foya and from Foya we went to Kolahun and then
27 Voinjama and then Zorzor, then we got to Gbarnga. That's
28 how we went.

29 Q. Did you take this route both times that you went with

1 Foday Sankoh?

2 A. Yes.

3 Q. When you travelled this route, did you ever have any
4 problems crossing into Liberia from Sierra Leone?

16:08:42 5 A. No, we had no problems in crossing.

6 Q. Who was in control of the border on the Liberian side?

7 A. Well, when we were crossing over, we met the Liberian
8 securities there and they were NPFL.

9 Q. When you travelled from the border to Gbarnga, did you
16:09:02 10 go through checkpoints?

11 A. Yes.

12 Q. Who controlled these checkpoints?

13 A. The NPFL soldiers.

14 Q. Did you ever have problems at those checkpoints?

16:09:15 15 A. No.

16 Q. Now, why did you go to Gbarnga these two times?

17 A. Foday Sankoh told us that it was one of his bases.

18 When he used to go there, he used to go there to meet his
19 brother, Charles Taylor.

16:09:34 20 Q. And when he told you it was one of his bases, what did
21 you understand that to mean?

22 A. That it was a place that was there for him. Whenever
23 he goes to Gbarnga, that was where he was to stay.

24 Q. On this first trip to Gbarnga, did you have any
16:09:58 25 communications during that trip?

26 A. Yes.

27 Q. And what communications did you have?

28 A. When we crossed the border, we go to Foya. Foday
29 Sankoh told us that he was going to the signal room; that

1 is the radio room. He disembarked from the vehicle and he
2 went into the radio office and we kept guard. After some
3 time he came out. Then he told us that he had spoken to
4 his brother Charles in Gbarnga and his brother said, 'No
16:10:29 5 problem' and that he would be happy to receive him. Then
6 we went."

7 Pause. The witness is there seeking to outline a
8 procedure, Mr Taylor. They would leave Pendembu, they would
9 travel to Foya, there, a radio message would be sent to you or
16:11:00 10 Foday Sankoh would speak to you on the radio and effectively you
11 would say, "Come on over. No problem." What do you say about
12 that?

13 A. Total nonsense. Foday Sankoh would not leave Sierra Leone
14 to come to Liberia without first consulting me. So contacts were
16:11:20 15 made with me before he would ever leave. It doesn't make sense
16 he would just come, drive to the border, come inside Liberia and
17 say, "Guess what? I'm coming." It never happen that way.

18 Foday Sankoh would call - if he went into a signal room, he
19 would call to the radio, Butterfly would get the call, because
16:11:43 20 I'm not close to the radio room, he would bring the message, I
21 would relay a message to tell Foday Sankoh that he could come,
22 but it would not happen from inside Liberia and I would not get
23 on the radio. So he's got it all wrong. It would not happen
24 that way.

16:11:59 25 Q. And just so that we're clear, Mr Taylor, on page 12838 of
26 the passage I've just read out, the witness says, "In 1991 I
27 travelled with him once. In 1992 we travelled again." Now, is
28 that possible?

29 A. Yes, it's possible.

1 Q. Within what window?

2 A. Well, we're talking about in 1991, that would be between
3 August and December. In 1992, that would be between January and
4 May.

16:12:37 5 Q. Could it be any other time apart from those you've
6 outlined?

7 A. No, no, no, there could not have been because the cut-off
8 point is May. There could not have been any other time that he
9 would have been permitted in there, no.

16:12:53 10 Q. "Q. Now you said that he went into a radio room in Foya.
11 Whose radio room was this?"

12 A. Well, this radio room, it was the NPFL who controlled
13 it. I did not know who was operating it."

14 Pause again, Mr Taylor. Did the NPFL have a radio room in
16:13:15 15 Foya?

16 A. Yes, yes. Every major town almost we had radios, yes.
17 But, counsel, I would not disagree that Foday Sankoh could have
18 stopped in Foya and made a call, but his assertion that Foday
19 Sankoh - that I would not have known that Foday Sankoh was coming
16:13:40 20 until he got to Foya, he is totally off the track with that.

21 That's the point I'm trying to make, okay? So it's very possible
22 that after he arrived in Foya he could have called somebody, but
23 he would not have called me to say, "Oh I would want to come to
24 you" before, no. I would know before. I don't dispute that. I
16:14:02 25 would know before.

26 Q. "A. Well, this radio room, it was the NPFL that controlled
27 it. I did not know who was operating it.

28 Q. What happened when you arrived at Gbarnga on this first
29 trip.

1 A. When we went we arrived at night. Later I saw someone
2 come and introduce himself as an SS officer. He said he
3 had come from Charles Taylor's mansion. I saw him enter to
4 Foday Sankoh. After some time he came out.

16:14:40 5 Q. Now, where were you when this happened?

6 A. Well, the area where we went in Gbarnga, Foday Sankoh
7 told us that that place was called the Far East. That was
8 where we went. That was where the house was."

9 Pause. Do you know an area called the Far East?

16:14:58 10 A. Yes, I do.

11 Q. Is there an area in Gbarnga called the Far East?

12 A. There is an area called the Far East, and that's where
13 Foday Sankoh's guesthouse was.

14 Q. And that's where Foday Sankoh's guesthouse was?

16:15:11 15 A. That is correct.

16 Q. What's the area called where your mansion was?

17 A. That - we are almost in the centre of town.

18 Q. What's it called?

19 A. I don't know the area. It didn't have a name. They called
16:15:28 20 that place the Far East because it was a little way outside the
21 centre of town. That's why they call it the Far East. So this
22 is what I said earlier in my testimony, when somebody said that
23 Foday Sankoh's house was one street away from me, I said it's a
24 blatant, blatant falsehood, okay? This Far East is where the
16:15:45 25 house was, and the Far East is called Far East because it's a
26 little way from the centre of the town and the Executive Mansion,
27 so to speak, is around the centre of Gbarnga Town.

28 Q. "A. Well the area where we went in Gbarnga, Foday Sankoh
29 told us that the place was called the Far East. That was

1 where we went. That was where the house was.

2 Q. When you say 'the Far East and this is where the house
3 was', whose house was there?

4 A. It was Foday Sankoh's place.

16:16:18 5 Q. You said that an SS officer came. Did you learn what
6 'SS' meant?

7 A. Yes, later I was made to understand that SSS was
8 Special Security Services.

9 Q. And did you learn for whom the Special Security Service
16:16:44 10 worked?

11 A. Yes.

12 Q. Who was that?

13 A. They were Charles Taylor's securities.

14 Q. So what happened after the SS man went in to Foday
16:16:57 15 Sankoh and then came out?

16 A. Foday Sankoh went to the mansion to Charles Taylor.

17 Q. Did anyone go with him?

18 A. Yes, I went with him, together with some other
19 securities.

16:17:14 20 Q. And what happened at Charles Taylor's mansion.

21 A. We went there. When we got there Foday Sankoh entered.
22 He told us that he was going to meet his brother Charles,
23 and so we waited in the waiting room. We were there up to
24 1.30, and he came back and we went home."

16:17:38 25 Waiting room, Mr Taylor?

26 A. Yes, there was a waiting room at the front of the mansion
27 where the offices were. But when we look at this, it draws my
28 attention to what another witness said about this. Now, Foday
29 Sankoh here, if I understand this properly, arrives in the night.

1 Q. Yes, bottom of page 12839, line 29, "We arrived at night".

2 A. So he arrives in the night. Now this is a different story.

3 Somebody else said that he went along - and this could have very

4 well, I admit, be another time - and we were supposed to be

16:18:22 5 meeting on the veranda and different things. It's very, very

6 possible that I would have seen Foday Sankoh. But if Foday

7 Sankoh had arrived in Gbarnga in the night after about 10/15

8 hours' drive, I don't remember meeting Foday Sankoh at night. So

9 this is just another story. If he came at night, I don't think I

16:18:45 10 would meet Foday Sankoh. I don't recall meeting him at night in

11 Gbarnga.

12 Q. Well, the witness goes on to say that the meeting went on

13 until 1.30?

14 A. No, that would not be true. I would be - I had my wife and

16:19:03 15 children living with me in Gbarnga. I would not be out with

16 Foday Sankoh. He came to me. He would wait until the next day,

17 as simple as that.

18 Q. Mr Taylor, help us. How long would it take to drive from

19 Pendembu to Gbarnga?

16:19:20 20 A. I would put it to about 15 to 17 hours, given the road

21 conditions.

22 Q. Now help us, Mr Taylor. The clear inference from the

23 evidence of this witness, if they arrive after midnight and the

24 meeting is going on until 1.30 in the morning, it suggests some

16:19:44 25 urgency, doesn't it?

26 A. Yes. If he can't sleep and wait until the next morning in

27 1991, that's not - that's what I'm saying. That's not - I don't

28 recall ever meeting Foday Sankoh at midnight, no.

29 Q. "A. We were there up to 1.30, and he came back and he went

1 home.

2 Q. You said you were there until 1.30. Is that in the
3 afternoon or in the early morning.

4 A. Well, we went there at night, 1.30 a.m.

16:20:16 5 Q. What happened then when you arrived back at the
6 residence?

7 A. We came back home. Foday Sankoh told us that he had
8 spoken with his brother Charles. He said he was happy. He
9 said his brother had told him that he will help him with
10 materials to return.

16:20:29

11 Q. And did you understand what 'materials' meant?

12 A. Well, he said arms and ammunition.

13 Q. What happened after that?

14 A. After that, the following morning they came with the
15 arms and ammunition in a vehicle.

16:20:49

16 Q. And who came with the arms and ammunition?

17 A. One SS officer.

18 Q. Do you remember that person's name?

19 A. He called himself - he said he was Cassius Jacob."

16:21:03

20 Was Cassius Jacob an SSS officer, Mr Taylor?

21 A. No. At this time, no, Cassius Jacob is not an SSS officer.

22 In fact --

23 Q. What is he?

24 A. Cassius Jacob by this time - I think Cassius Jacob is a
25 young man with the task force, and he's not in the position at
26 this time to even - in 1991 to be in this -

16:21:20

27 Q. '91, '92?

28 A. No, Cassius Jacob has not risen to that level that he would
29 be entrusted with this, no, no.

1 Q. "Q. What happened after he arrived with the arms and
2 ammunition?

3 A. He handed over everything to Foday Sankoh and then he
4 returned.

16:21:54 5 Q. Did you learn what type of arms and ammunition he had
6 handed over?

7 A. He came with AK rounds, RPG bombs, grenades and other
8 weapons which I can't recall now.

9 Q. Do you recall what quantity of materials you were given
16:22:08 10 at that time?

11 A. There were plenty. I can't recall now.

12 Q. You said this person came with the materials in a
13 truck. What happened to the truck?

14 A. This truck, Foday Sankoh said that the truck should
16:22:20 15 take the materials to Sierra Leone.

16 Q. Now this truck, was this a truck you had brought to
17 Gbarnga?

18 A. No, it came from there. It had come from the mansion.

19 Q. Who took these arms and ammunition back to Sierra
16:22:33 20 Leone?

21 A. One other security who was with Foday Sankoh. His name
22 was Papa. They took some ammunition to Sierra Leone.

23 Q. And what was Papa's nationality?

24 A. Papa was a Liberian.

16:22:47 25 Q. Do you know what group he was with?

26 A. At first he was with the NPFL and he later joined Foday
27 Sankoh. "

28 Do you know this Papa, Mr Taylor?

29 A. No, I don't know the Papa. But, counsel, I just want to

1 draw attention. I think Prosecutor - the Prosecutor at the time
2 misstated what the witness said. The witness originally, if you
3 go back, did not say that the vehicles were brought in a truck.

4 The Prosecutor said that. The witness said that he brought

16:23:24 5 materials in a vehicle, and we may have to define what that -

6 when we talk about vehicle in Liberia, we're talking about a

7 little half ton pick-up truck. Let's go back. He misstated --

8 Q. All right. Let's go back to page 12841.

9 A. Yeah, he misstated. He said he came with these things in a

16:23:47 10 vehicle. Then he asked the question and added a truck.

11 Q. You should have been a lawyer, Mr Taylor:

12 "Q. What happened after that?

13 A. After that the following morning they came with the

14 arms and ammunition in a vehicle."

16:24:00 15 A. Yes.

16 Q. "Q. And who came with the arms and ammunition?

17 A. One SS officer.

18 Q. Do you remember that person's name?

19 A. Cassius Jacob.

16:24:12 20 Q. You said this person came with the materials in a
21 truck."

22 A. See that? He didn't say "a truck". There's a difference
23 for us between truck and a vehicle. He's referring to either a
24 half ton pick-up or a jeep. He did not say "truck".

16:24:30 25 Q. Well, you certainly don't need me here, Mr Taylor, if you
26 can spot that and I didn't. Over the page:

27 "This truck, Foday Sankoh said that the truck should take
28 the materials to Sierra Leone.

29 Q. Now this truck, was this a truck you had brought to

1 Gbarnga?

2 A. No, it came from there. It come from the mansion.

3 Q. Who took these arms and ammunition back to Sierra
4 Leone?

16:24:57 5 A. One other security who was with Foday Sankoh. His name
6 was Papa. They took the ammunition to Sierra Leone.

7 Q. And what was Papa's nationality?

8 A. Papa was a Liberian.

9 Q. Do you know the group he was with?

16:25:12 10 A. At first he was with the NPFL and later he joined Foday
11 Sankoh.

12 Q. Did Foday Sankoh give Papa any instructions as to what
13 to do with these arms and ammunition?

14 A. He told Papa to take the arms and ammunition to
16:25:28 15 Pendembu to give them to Kargbo, who was the battle group.

16 Q. What did Foday Sankoh and you and the others do after
17 Papa left?

18 A. Well, Foday Sankoh went back to the mansion to his
19 brother. He gave him one other pick-up with arms and
16:25:45 20 ammunition. "

21 Yes, Mr Taylor?

22 A. See? Now, if I'm right, he says he gave him "one other
23 pick-up". So vehicle as he referred to in the beginning, he's
24 referring to this now as "another". So I'm at liberty to assume
16:26:02 25 he's still talking about a pick-up that he's talking about, and I
26 would not deny because of the quantity - the small quantity of
27 arms, that a vehicle would have taken it to him. So he's saying
28 he gave him another.

29 Q. Right. So Mr Taylor, let's pause and just clarify the

1 position. Did you ever provide Sankoh, in that period August '91
2 to May '92, with truckloads of arms and ammunition?

3 A. No, never did. No.

4 Q. Did you provide with him pick-up-loads of arms and
16:26:35 5 ammunition?

6 A. Not loads. We gave him ammunition in pick-up trucks, yes.

7 Q. And what's a pick-up truck as opposed to a truck?

8 A. What we call a pick-up truck, you have these - mostly they
9 are built by Toyota. We call them Toyota Land Cruisers. They
16:27:02 10 are Land Cruiser pick-up trucks. Mitsubishi pick-up trucks, they
11 are half ton in weight. They are half ton, open back. Some of
12 them have twin carriage; some of them have a single cabin, okay?
13 And the single cabin in the front would take about two, maximum
14 three, but the back is open. That's what we call a pick-up
16:27:23 15 truck, okay?

16 Now, a truck in Liberia is anything from six tyres upward
17 that would take 10, 15, 20 tons, we would call a truck. And I
18 say in other countries they have different interpretations. Like
19 when you hear in America, "Bring my truck," they are not talking
16:27:38 20 about a tractor trailer. We would categorise a tractor trailer
21 as a truck, but in America, for example, they would call it a
22 tractor trailer, but a truck in America could be a jeep. So
23 there's a big difference here.

24 We don't have the quantity of material and we do not - I do
16:27:56 25 not deny before this Court that within that period we'd - what -
26 within our means that we did not supply Foday Sankoh sometimes
27 with some arms, okay, and ammunition. We do - I do not deny
28 that. But in quantities that were affordable to us, and they
29 were very small quantities. For that period between August of

1 1991 and May of 1992, there were small amounts within our means
2 that we would assist him while we had our special operation going
3 on fighting ULIMO in Sierra Leone that they would not fight us in
4 Liberia.

16:28:38 5 Q. "Q. How do you know it was Charles Taylor who gave Foday
6 Sankoh these materials?

7 A. Whatever happened he told us, the bodyguards to him.

8 Q. Just to be clear, when you say 'he told us', who are
9 you talking about?

16:28:56 10 A. Foday Sankoh used to tell us that Charles Taylor was
11 his brother. Whatever arms and ammunition he gave to him,
12 we, the bodyguards - he will us, the bodyguards, that was
13 his brother that had given them to him.

14 Q. Now, you said it was a pick-up truck that the materials
16:29:16 15 were in. Did you learn what kind of materials were in this
16 pick-up truck?

17 A. Yes.

18 Q. What kind of materials?

19 A. AK rounds were there, RPG and AK rounds, RPG and M203
16:29:34 20 gun and others which I cannot recall.

21 Q. What happened after this pick-up truck was brought with
22 these arms and ammunition in it?

23 A. Well, we travelled with Foday Sankoh to Sierra Leone.

24 Q. Where did you go in Sierra Leone?

16:29:47 25 A. We went to Pendembu.

26 Q. During this trip to Gbarnga, did you Charles Taylor?

27 A. No.

28 Q. During this first trip, did Foday Sankoh have any
29 communication with Sierra Leone while he was in Gbarnga?

1 A. Yes.

2 Q. And if you know, what type of communications did he
3 have?

4 A. Well, at that time, when he wanted to communicate to
16:30:10 5 Sierra Leone, he used to go to the Mansion Ground. The
6 operator was there and he was called Butterfly."
7 True or false?

8 A. There is an operator called Butterfly, yes.

9 Q. "That was where he communicated?"

16:30:26 10 PRESIDING JUDGE: I think we're just about out of tape.

11 MR GRIFFITHS: Very well. That's as good a point as any.

12 PRESIDING JUDGE: All right. Thank you. We'll adjourn
13 now.

14 Mr Taylor, just before we do, I'll remind you, you're not
16:30:42 15 permitted to talk about your evidence with anybody else.

16 And we will adjourn now until 9.30 Monday.

17 [Whereupon the hearing adjourned at 4.30 p.m.
18 to be reconvened on Monday, 14 September 2009
19 at 9.30 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

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EXAMINATION-IN-CHIEF BY MR GRIFFITHS 28533