



Case No. **SCSL-2003-01-T**

**THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR**

WEDNESDAY, 13 FEBRUARY 2008
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr Simon Meisenberg
Ms Sidney Thompson
Ms Carolyn Buff

For the Registry:

Ms Rosette Muzigo-Morrison
Ms Rachel Irura

For the Prosecution:

Ms Brenda J Hollis
Mr Nicholas Koumjian
Mr Alain Werner
Ms Shyamala Alagendra
Ms Leigh Lawrie
Ms Maja Dimitrova

**For the accused Charles Ghankay
Taylor:**

Mr Courtenay Griffiths QC
Mr Terry Munyard
Mr Morris Anyah
Ms Elizabeth Duby

1 Wednesday, 13 February 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:30:03 5 PRESIDING JUDGE: Good morning. I note appearances are as
6 yesterday and if there are no other matters I will remind the
7 witness of his oath.

8 Mr Witness, you recall last week you took the oath to tell
9 the truth. That oath is still binding on you and you must
09:30:22 10 continue to answer questions truthfully. Do you understand?

11 THE WITNESS: Yes, I do understand. I do understand.

12 WITNESS: TF1-548 [On former oath]

13 PRESIDING JUDGE: Mr Munyard, please proceed with
14 cross-examination.

09:30:48 15 MR MUNYARD: Thank you, your Honour.

16 CROSS-EXAMINATION BY MR MUNYARD: [Continued]

17 Q. Good morning, Mr Camara.

18 A. Good morning to you.

19 Q. Yesterday when we broke off we were walking the bush paths
09:31:03 20 in Lofa County and I want to ask you a little bit more about the
21 bush paths, please. I want to suggest to you that once ULIMO
22 took control of Lofa County certainly by 1993 there were no arms
23 and ammunition getting through from Liberia through to Sierra
24 Leone. What do you say about that?

09:31:38 25 A. I don't have anything to say to that. I don't know
26 anything about that. I have no knowledge of that question.

27 MR MUNYARD: I'm sorry, I was on channel zero by mistake so
28 I'll look at the reply.

29 PRESIDING JUDGE: The witness said he had no knowledge.

1 MR MUNYARD: Thank you:

2 Q. Well, can I ask you please to look at the document bundle
3 again. Madam Court Attendant, if you could assist. I'm going to
4 ask you to look at tab 4 starting on page 30772. Do you see
09:32:57 5 that, Mr Camara, on the screen in front of you?

6 A. Yes, I see it.

7 Q. I want to ask you about the third paragraph, the final
8 paragraph on that page, and do you see here --

9 A. Can you get it up, please?

09:33:22 10 Q. You see here that you told the investigators, Mr Berry and
11 Mr Morris, that when ULIMO had closed down the roads into Sierra
12 Leone in the later part of 1992, possibly between October and
13 December, you were not in Lofa County when this occurred.

14 Pausing there. Had you been told by somebody that ULIMO had
09:33:55 15 closed the roads into Sierra Leone between October and December
16 of 1992? Was that something you knew or was that something the
17 investigators were telling you?

18 A. At that time I was in Liberia so I knew about the fact.

19 Q. How did you know?

09:34:25 20 A. When there was - when the fight came into Lofa we had
21 explosives - we heard explosives so nobody had to tell me that a
22 fight was going on.

23 Q. But you were at Cobra Base then, weren't you?

24 A. Yes, at that time I was at Cobra Base.

09:34:55 25 Q. And you wouldn't hear the explosions in Lofa County in
26 Cobra Base, would you?

27 A. When there is a fight in Lofa you hear - you hear about -
28 you hear the sounds of arms.

29 Q. All the way to Cobra Base? Where again do you say Cobra

1 Base was?

2 A. Cobra is at Gbatala, near Gbarnga.

3 Q. And if there were explosions in the north western part of
4 Lofa County are you saying you could hear those?

09:35:57 5 A. From Zorzor to the waterside when there is a fight you can
6 hear it, you can be aware of it.

7 Q. And how many miles away is Zorzor, or kilometres if you
8 choose?

9 A. I really - I can't tell you. I really can't tell you the
09:36:23 10 number of kilometres.

11 Q. We're talking dozens if not hundreds of kilometres, aren't
12 we?

13 A. No, it's - no, no, not up to hundred. Less than hundred.

14 Q. How far do you say it was?

09:36:47 15 A. I am telling you that I don't know exactly how many
16 kilometres that is.

17 Q. Can we go back to the page, please, the same paragraph a
18 little bit further down. Do you see in the middle of the page,
19 it's five lines down from the beginning of that paragraph,
09:37:15 20 there's a sentence that starts, "By the time he was sent in
21 1993". Do you see that, Mr Camara?

22 A. What's the time you said?

23 Q. It's a sentence that starts halfway down that final
24 paragraph and it begins in the middle of the page with the words,
09:37:36 25 "By the time he was sent in 1993". Can you see that sentence?

26 A. Yes, I see the sentence.

27 Q. And is this what you told the investigators: By the time
28 you were sent in 1993 to assist Jallow ULIMO had control of
29 Zorzor to Voinjama. You advised the investigators that you knew

1 there were still footpaths and rough roadways still open along
2 the Bomi Hills and Cape Mount County areas which bordered with
3 Sierra Leone, but you had never been assigned there so your
4 knowledge was little. Can you remember telling the investigators
09:38:24 5 that?

6 A. Yes, I do remember telling them that.

7 Q. If you had never been there your knowledge wasn't little,
8 your knowledge was nil, wasn't it?

9 A. That's what's written in the statement, isn't it?

09:38:47 10 Q. Your knowledge was absolutely nil if you had never been to
11 the footpaths and roadways in Bomi Hills and Cape Mount County,
12 wasn't it?

13 MR WERNER: Your Honour, I'm sorry to object but what he
14 said here is not that he had never been there but been assigned
09:39:08 15 there which is not the same thing.

16 MR MUNYARD: I take the point and I'll clarify it:

17 Q. You said you had never been assigned there. Can we assume
18 that that means you've never been there?

19 A. I just said that I was never assigned there. I told you
09:39:31 20 that I knew that there were footpaths. There were many footpaths
21 in Liberia.

22 Q. You hadn't been on all of the footpaths in Liberia, had
23 you?

24 A. No, of course not, I haven't been everywhere.

09:39:56 25 Q. And you hadn't been on the footpaths in the Bomi Hills and
26 Cape Mount County, had you?

27 A. No, I haven't been there.

28 Q. Thank you. So it doesn't matter whether the word is had
29 never been assigned there or had never been there, it's the same

1 thing, isn't it?

2 A. Yes, I was never - I have never been assigned there.

3 Q. Or been there, or been there at all?

09:40:45 4 A. I told you I've been to Belle Yella, from Gorlu to Belle
5 Yella. I've been to Belle Yella, I've told you. I have seen
6 footpaths in that area which leads to Bopolu. There were even
7 footpaths to other directions also.

8 Q. I'm going to interrupt you because we're not talking about
9 Belle Yella and Bopolu. That was yesterday. Today we are
09:41:08 10 talking about Bomi Hills and Cape Mount County. I think you've
11 answered that you have never been on the footpaths in those
12 areas. That's correct, isn't it?

13 A. I didn't - I went to Belle Yella. I haven't used the
14 footpaths in that - in the Bomi Hill area.

09:41:34 15 Q. You've never been to Bomi Hills or Cape Mount County, have
16 you?

17 A. I haven't been in that area, but I took a car up to Lofa
18 Bridge, but I was not assigned in that - in that place.

19 Q. Can we move on and look at the last part of this paragraph,
09:42:06 20 please. You told the investigators that you were able to kick
21 out ULIMO from Zorzor and Voinjama in the later part of 1993 and
22 then the ULIMO took over the Foya and Kolahun area.

23 And going over the page to the top of page 30773 you went
24 on to tell the investigators that your forces and ULIMO's
09:42:48 25 switched areas back and forth for a while and then ULIMO pushed
26 you out of Voinjama to Zorzor and here the investigators have
27 recorded the time that you said ULIMO pushed you out of Voinjama
28 to Zorzor in these words, "In the early part of 1994 around
29 September or October".

1 Now this is what the investigators have written down
2 because we can see it in front of us, but what does it mean,
3 Mr Camara? In the early part of 1994 it could not possibly be
4 September or October, could it?

09:43:45 5 A. I said that in 1994 we had a fight with ULIMO at Lofa.
6 There was the LDF, the Lofa Defence Force, we were fighting in
7 that force. We were pushed out of Lofa completely.

8 Q. It's the dates that we are interested in, not what actually
9 happened. Can you concentrate please on that phrase and tell us
09:44:18 10 what on earth does it mean, "In the early part of 1994 around
11 September or October". Whose got it wrong, you or the
12 investigators?

13 A. September, October, it says it's in 1994.

14 Q. But it says the early part of 1994. Now by no stretch of
09:44:47 15 the imagination is September or October early 1994. Who has
16 recorded that - whose got that wrong? Have the investigators
17 written down something that you didn't say or did you say
18 something that is a contradiction in terms?

19 A. I told them that in 1994 ULIMO pushed us out of Lofa around
09:45:20 20 September or October. That's what I said. We were pushed out of
21 Lofa around September or October.

22 Q. So the investigators have written down something wrong yet
23 again, have they?

24 A. No, the date is correct. It's September, October in 1994.

09:45:48 25 Q. Mr Camara, I'm going to try one last time. Do you
26 understand what is contradictory about that expression, "In the
27 early part of 1994 around September or October"? Do you
28 understand what the problem with that expression is?

29 A. It was in September, October that we were pushed out of

1 Lofa. The Lofa Defence Force, we were pushed out of Lofa.

2 PRESIDING JUDGE: Mr Witness, do you understand the
3 question that is being put to you? It is not what time you were
4 being pushed out, it is why does this statement say the early
09:46:35 5 part of 1994 and then says September or October which is not the
6 early time of 1994. Why is it recorded in that way?

7 THE WITNESS: Maybe it must be mistake made by the
8 investigators, those who have taken down my statements. But we
9 left Lofa in September or October, so there must have been a
09:47:10 10 mistake made by the investigators.

11 MR MUNYARD:

12 Q. All right, thank you. Another mistake that you failed to
13 correct when they read back the interview to you. Is that right?

14 A. I told you that I don't understand very well English. I
09:47:33 15 don't know the - I don't know English the way you know it. I
16 don't know as well as you.

17 Q. Mr Camara, I want to suggest to you that once ULIMO took
18 over Lofa County and the rest of the western side of Liberia no
19 arms or ammunition got through from Liberia to Sierra Leone.

09:47:58 20 There might have been some fighting in the bush, but no arms
21 shipments got through from Liberia to Sierra Leone. What do you
22 say about that?

23 A. At that time I was fighting. It's quite possible, but at
24 that time I was in the bush fighting, because even sometimes we
09:48:26 25 had - we received supplies.

26 Q. I'm not suggesting that you didn't receive supplies to
27 fight ULIMO. I'm talking about arms and ammunition going through
28 from Liberia to Sierra Leone. Do you agree with me that you
29 don't know whether arms and ammunition got through to Sierra

1 Leone once ULIMO had taken over the western part of the country?

2 A. Yeah, indeed there were arms sent to Sierra Leone from
3 Liberia.

4 Q. I'm talking about the time after ULIMO were in control of
09:49:11 5 western Liberia. Do you follow?

6 A. I am telling you that since we retreated from Lofa at that
7 time there was a fight in Gbarnga.

8 THE INTERPRETER: Can the witness repeat that part, please.

9 PRESIDING JUDGE: Mr Witness, could you please repeat the
09:49:42 10 last part of your answer for the interpreter.

11 THE WITNESS: I say that when we left Lofa and I took my
12 assignment in Gbarnga I have seen planes leaving Gbarnga, the
13 airfield of Gbarnga, going to Sierra Leone and they had arms and
14 ammunitions on board.

09:50:19 15 MR MUNYARD:

16 Q. And what sort of planes were these leaving Gbarnga?

17 A. It was not passenger planes. It was smaller types of
18 aircrafts.

19 Q. Are you talking about planes or helicopters?

09:50:46 20 A. The helicopter is the one which has fans, but the one I'm
21 talking about have no fans. The ones who have - you know the
22 others are planes for me, so I don't know how you call those
23 ones, the ones which do not have fans, because I don't know how
24 you would call them.

09:51:18 25 Q. Where do you say the airport was in Gbarnga?

26 A. It was an airfield, not an airport.

27 Q. I want to suggest that there were no aeroplanes of any sort
28 that could take off from Gbarnga at that time. What do you say
29 about that?

1 A. There is an airfield at Gbarnga. There is - it's on the
2 right-hand side when you're coming from Gbatala.

3 Q. And you say that you saw aeroplanes. How big were they?

4 A. The small - it was small airplanes, not big ones. It was
09:52:32 5 smaller planes, airplanes.

6 Q. How many of them did you see?

7 A. I don't know exactly. I haven't seen them all. I know
8 that there were some who left that airfield.

9 Q. How many of these planes did you see?

09:53:14 10 A. I have seen the arms and ammunitions being boarded. I
11 escorted them myself from Mansion Ground. I know that several
12 times - several times planes were lifting arms and ammunitions.

13 JUDGE SEBUTINDE: Madam Interpreter, did you say I haven't
14 seen the arms and ammunitions, or I have seen?

09:53:48 15 THE INTERPRETER: I have seen.

16 MR MUNYARD:

17 Q. Can we clarify this, please. Are you saying, Mr Camara,
18 that you saw the arms and ammunition?

19 A. Yes. I said that.

09:54:23 20 Q. And this is --

21 A. I have told you that I was present at one occasion. I was
22 present at that occasion.

23 Q. I thought you said after Gbarnga fall. Is that what you
24 said? It's not come up on the screen, but that's what I heard
09:54:51 25 and I see Mr Werner nodding his head.

26 MR WERNER: Yes, your Honour, I was going to - I don't
27 think the whole sentence was translated.

28 PRESIDING JUDGE: Madam Interpreter, could we have the
29 entire answer translated again, please.

1 THE INTERPRETER: Can the witness repeat, please, and
2 slowly.

3 PRESIDING JUDGE: Mr Witness, please repeat your answer.
4 We may not have had all of it interpreted. Please speak slowly.

09:55:20 5 THE WITNESS: When we recaptured Gbarnga after it had
6 fallen I was assigned at Mansion Ground, EMG. I myself made some
7 escorts, arms - I escorted arms and ammunitions to the airfield
8 in Gbarnga. I know that those arms and ammunitions was destined
9 to Sierra Leone, but I have also heard - I know - and I know, I'm
09:56:20 10 sure, that those planes - on many occasions planes left Gbarnga
11 for Sierra Leone with arms and ammunitions.

12 MR MUNYARD:

13 Q. Mr Camara, we don't want to know at the moment what other
14 people have told you. What I'm asking about is what you
09:56:39 15 personally saw and what you personally knew. Do you understand
16 that?

17 A. I didn't tell that somebody told me. I have seen arms.
18 Myself escorted ammunitions and arms. I don't know what you want
19 - what else do you want me to say?

09:57:04 20 Q. How many times do you say you escorted arms and ammunition
21 to aeroplanes leaving the airfield at Gbarnga?

22 A. I know that it was once for sure. I'm sure of one. I have
23 escorted arms and ammunitions once to the airfield.

24 Q. And how do you know where they were going?

09:57:51 25 A. The security people I was accompanying from Mansion Ground,
26 I knew those arms and ammunitions were to be sent to Sierra Leone
27 because the generals - some generals were present. And don't
28 forget that I was part of the Special Forces in Liberia.

29 Q. I'm going to come back to your role as part of the Special

1 Forces, but is this what you're telling us: That you had
2 personal knowledge that these arms were going to Sierra Leone?

3 A. Yes, the arms were for Sierra Leone.

4 Q. And you had personal knowledge of that, did you?

09:58:57 5 A. It's my own personal knowledge.

6 Q. Have a look again please at page 30773. Madam Court
7 Attendant, we might need you. Thank you. I want to carry on - I
8 don't know if the witness's screen is showing - it is, is it?

9 Yes. We read the first two lines. I want you to carry on now

09:59:43 10 and I'd like you to look at the rest of that paragraph. "They
11 held on", that's ULIMO held on, "to Zorzor for two to three
12 months before being pushed back to Gbarnga in late 1994." Sorry
13 I think that's you. I'm going to start again.

14 You advised the investigators that ULIMO pushed you out of

10:00:16 15 Voinjama to Zorzor in early 1994 around September, October. You
16 held on to Zorzor for two to three months before being pushed
17 back to Gbarnga in late 1994. This was during the Lofa defence

18 operation. During this time you knew that the roads to Sierra
19 Leone were closed to you and even when you were in Voinjama and

10:00:38 20 Zorzor because you really had to get to Foya to get into Sierra
21 Leone. There were bush trails but they were long and rough from
22 Voinjama to Sierra Leone and you do not know if these routes were
23 used or not.

24 Pausing there. Do you agree this is what you told these
10:00:59 25 investigators?

26 A. I don't get your statement very well. Can you please
27 clarify.

28 Q. I have just read to you a part of this first paragraph on
29 this page. Do you agree that what is written there is what you

1 told the investigators who were interviewing you?

2 A. I said --

3 JUDGE SEBUTINDE: Madam Interpreter, what was that you
4 said?

10:01:54 5 THE WITNESS: What did I say? Can you repeat?

6 THE INTERPRETER: He wants to know what the counsel said.

7 MR MUNYARD:

8 Q. What we've just looked at together, Mr Camara, on that
9 page, is that what you told the investigators?

10:02:10 10 A. Can you read - can you please read again the part of the
11 statement you're talking about.

12 PRESIDING JUDGE: Mr Munyard, if you would put it slowly to
13 allow the interpretation, please.

14 MR MUNYARD: Yes. If I slow down much more I'll come to a
10:02:30 15 full stop, but I'll try.

16 PRESIDING JUDGE: I'm afraid the technology.

17 MR MUNYARD: Very well:

18 Q. Mr Camara, I'm going to read this passage again to you and
19 I want you to tell us have the investigators correctly recorded
10:02:51 20 what you told them when they wrote this down. Now I'm going to
21 read it.

22 "The witness", that is you, "advises that ULIMO pushed
23 them", that's you, "out of Voinjama to Zorzor in the early part
24 of 1994 around September or October. That they", that's you,
10:03:26 25 "held on to Zorzor for two to three months before being pushed
26 back to Gbarnga in late 1994. This was during the Lofa defence
27 operation. During this time he knows", that's you knew, "that
28 the roads to Sierra Leone were closed to them", that's to you and
29 even when you were in Voinjama and Zorzor, "because you really

1 had to get to Foya to get into Sierra Leone. There were bush
2 trails but they were long and rough from Voinjama to Sierra Leone
3 and he", that's you, "do not know if these routes were used or
4 not."

10:04:28 5 Very simple question from me now, Mr Camara, is that what
6 you told the investigators when they were interviewing you in
7 April of last year?

8 A. Yes. Yes, that's what I said, I didn't know what was going
9 - the bush roads, people were using bush roads, so that's a fact.

10:05:02 10 Q. Well, you said that you didn't know if people were using
11 these bush roads in that passage we have just read together?

12 A. Yes, yes. There were bush roads and the people were using
13 them, but I don't know anything about those, what was happening
14 on those roads.

10:05:29 15 Q. Well, why did you tell the investigators that there were
16 bush trails but you didn't know if they were being used or not?

17 A. I knew that they there were roads.

18 Q. And you didn't know whether they were being used or not
19 when you were seen by the investigators in July of last year, did
10:05:59 20 you?

21 A. I cannot - I cannot confirm this statement.

22 Q. I'm now going to carry on reading more from that paragraph.

23 "The witness", that's you, "knows that arms were airlifted
24 to Sierra Leone as there was an airstrip in Gbarnga that planes
10:06:27 25 used to land at and some of these planes he believes, but has no
26 personal knowledge, transported arms to Sierra Leone."

27 Why did you tell us a few minutes ago that you had personal
28 knowledge that these planes were transporting arms to Sierra
29 Leone when you told the investigators less than a year ago that

1 you had no personal knowledge that these arms were being
2 transported to Sierra Leone?

3 A. No, no, I didn't say that. I knew that planes were leaving
4 Gbarnga to Sierra Leone with arms and ammunitions.

10:07:29 5 Q. So why did you tell the investigators --

6 A. Let me answer to your question, please. I said that they
7 asked if I knew how much were the cost of the arms and ammunition
8 and I said I didn't know that because I was not in Sierra Leone
9 to answer that question.

10:07:58 10 Q. Why did you tell the investigators that you had no personal
11 knowledge, that it was simply your belief that these arms were
12 being transported to Sierra Leone?

13 A. I said that the arms and ammunitions were transported to
14 Sierra Leone, but their cost in Sierra Leone, I didn't know how
10:08:32 15 much they cost in Sierra Leone, but I didn't say that arms and
16 ammunitions were not transported to Sierra Leone and it's not in
17 my statement.

18 Q. What is not in your statement, Mr Camara, is that you
19 personally escorted these arms to the airport from the Executive
10:08:59 20 Mansion. Why on earth didn't you tell the investigators that
21 that's how you knew about all of this?

22 A. The arms and ammunitions were transported to Sierra Leone.
23 I haven't escorted them all, but I knew that they were
24 transported to Sierra Leone and I don't know how much they cost
10:09:24 25 in Sierra Leone.

26 Q. I'm now asking you about them being transported from the
27 Executive Mansion to the airstrip. Why didn't you tell the
28 investigators that that's how you knew about these weapons?

29 A. You - maybe you should ask the investigators, because I

1 told them.

2 Q. Are you saying you told them that you had personally
3 escorted these arms and ammunition from the Executive Mansion to
4 the aircraft?

10:10:17 5 A. I didn't escort all the arms and ammunitions.

6 Q. Just the ones that you did escort, just the ones you did
7 escort, are you telling this Court that you told the
8 investigators that you had escorted some of the arms from the
9 Executive Mansion to the aircraft?

10:10:44 10 A. I remember having escorted once arms and ammunitions.

11 Q. Please listen to the question. Are you saying to the Court
12 that you told the investigators that on one occasion you
13 personally escorted these arms to the aircraft waiting at the
14 airstrip in Gbarnga?

10:11:14 15 A. Yes, I told them.

16 Q. So is it your case that they have failed to record that
17 which you told them?

18 A. I don't know. I cannot answer that question.

19 Q. It's not written there, Mr Camara, so if you told them then
10:11:41 20 that's another failing on their part, isn't it?

21 A. I don't know.

22 Q. That your best answer, is it?

23 A. Yes, that's my answer.

24 Q. Well, let's finish the reading of that paragraph, please.

10:12:23 25 It carries on - after the words, "But he has no personal
26 knowledge the planes transported arms to Sierra Leone" it carries
27 on as follows:

28 "He has no knowledge of any choppers being used to
29 transport as he only recalls smaller two propeller planes at

1 Gbarnga. Witness has no knowledge", that's you, "where they
2 would land in Sierra Leone. After they had been pushed out of
3 Lofa he had been stationed in Gbarnga and Gbatala", again this is
4 you, and the airlifts to your knowledge occurred both before and
10:13:19 5 after the fall of Gbarnga to the ULIMO.

6 Were you telling the investigators that the airlifts from
7 the airstrip continued even after ULIMO had taken control of
8 Gbarnga?

9 A. No, no, when ULIMO took control of Gbarnga, I said after
10:14:03 10 ULIMO never controlled Gbarnga completely and they hadn't
11 controlled for a long time all of Gbarnga. The control lasted
12 maybe two or three months only. I know that the planes were
13 leaving Gbarnga before even they had taken Gbarnga and after they
14 had control, they captured Gbarnga, planes were landing in
10:14:32 15 Gbarnga.

16 Q. I'm going to move on, please, Mr Camara. The final matter
17 about bush paths is this: I asked you a question earlier to
18 which you didn't give me a reply. Do you agree that you simply
19 do not know if bush paths were being used - once ULIMO took over
10:14:57 20 western Liberia if bush paths were being used to transport arms
21 and ammunition to Sierra Leone? Do you agree you just don't know
22 whether that was happening?

23 A. I said that it was - I don't know if they were using them
24 or if they were not using the rough paths because I was not
10:15:31 25 assigned in the bush.

26 Q. Thank you. Now you mentioned being a member of Special
27 Forces and then you've already told us that you were working as
28 Cobra Base as a training instructor and was it Major Kato?

29 A. Kato it is.

1 Q. And what's his rank?

2 A. Major. It's Major Joseph Kato.

3 Q. And he was just a junior commander, wasn't he? Sorry, a
4 junior commando.

10:16:18 5 A. Yes, yes, he was a junior commander indeed.

6 Q. So what was he doing being in a superior position to you,
7 an elite member of the Special Forces?

8 A. He was not the leader of the Special Forces. Major Kato
9 was part of the EMG. We were under SSS unit.

10:16:51 10 Q. That's my point. Were you really working as a training
11 instructor at Cobra Base or were you simply part of the general
12 security in that area?

13 A. I was a training instructor and I've told you that already.

14 Q. And was Major Kato superior to you?

10:17:25 15 A. He was a major and at that time I was a captain.

16 Q. This is the time in 1992, is it?

17 A. Yes, yes, 1992 to 1996 I was on a permanent assignment and
18 I was having TDYs.

19 Q. And how many TDYs do you say you went on all together?

10:17:56 20 A. I had three TDYs in Lofa and one in EMG ground force after
21 Gbarnga fall.

22 Q. I want to suggest to you that there were no special boy
23 units in either Cobra Base or at the Executive Mansion?

24 PRESIDING JUDGE: Do you mean Small Boy Units?

10:18:24 25 MR MUNYARD: I think I said special by mistake, didn't I.
26 I'm sorry, yes.

27 Q. We'll start again with that one, Mr Camara. I want to
28 suggest to you that there were no Small Boy Units in either Cobra
29 Base being trained or at the Executive Mansion?

1 A. I told you that Small Boy Units were being trained in
2 Cobra. Cobra is a training camp. It was only the instructors
3 who were based there permanently. The SBUs used to come for
4 training at Cobra Base.

10:19:18 5 Q. You mentioned someone called Supoon. Have I correctly
6 pronounced his name?

7 A. Yes, Supoon.

8 Q. He wasn't a Small Boy Unit commander, he was a relative of
9 Charles Taylor, wasn't he?

10:19:39 10 A. I didn't say that. I don't know. I don't know anything
11 about that.

12 Q. I'm suggesting to you the reason he was at the Executive
13 Mansion Ground is because he was a relative of Mr Taylor. You're
14 saying now you didn't know that?

10:20:03 15 A. Supoon was an SBU commander. He was not a relative of
16 Charles Taylor.

17 Q. A moment ago you said you didn't know whether he was a
18 relative of Charles Taylor. Now you're saying he wasn't a
19 relative of Charles Taylor. Which one is it, Mr Camara; you
10:20:23 20 don't know or he definitely wasn't?

21 A. I know Supoon as a commander of the SBU, a Small Boys Unit.
22 During all my stay in Liberia nobody told me that Supoon was
23 Taylor's relative.

24 Q. I'm now going to ask you about something different. It's
10:20:59 25 right, isn't it, that when ULIMO attacked in Lofa County many
26 civilians actually fled from Lofa County and came to Gbarnga?

27 A. Yes, civilians retreated to Gbarnga.

28 Q. Another separate issue, please. You've told us that you
29 would sometimes hear secret radio communications when you were at

1 the Executive Mansion Ground. Do you remember saying that the
2 other day?

3 A. Yes, I do.

4 Q. How would they be a secret if somebody like you could
10:21:46 5 listen in on them?

6 A. I told you that I was - I was at Mansion Ground. It's
7 Charles Taylor himself who had given me an assignment. We were
8 making tea for him at that time and we had the opportunity to
9 hear - to hear the communications when we were doing tea for him,
10:22:21 10 making tea for him.

11 Q. So let me see if I understand this correctly. That the
12 person who was making tea was able to listen in quite by chance
13 to top secret military radio communications. Is that the
14 evidence that you're giving to this Court?

10:22:57 15 THE INTERPRETER: Sorry, can the witness repeat.

16 PRESIDING JUDGE: Mr Witness, would you please repeat your
17 answer.

18 THE WITNESS: I'm telling you that the military questions
19 you're talking about, I don't know what - I have always been with
10:23:21 20 the military leaders. When I was guarding the gates I used to be
21 with the military leaders.

22 MR MUNYARD:

23 Q. Right, would you now go back to the question I asked and
24 try and answer that?

10:23:45 25 A. I said I used to sit and chat with the military leaders.

26 Q. Mr Camara, I asked you how was it that a person who was
27 simply there to make a cup of tea was able to listen in to top
28 secret military radio communications. Could you explain to the
29 Court how that was possible in the middle of a civil war?

1 A. I told you that the room in which we had received
2 communications and the gate where I was standing there was only 5
3 metres between them and Charles Taylor's own bedroom, there were
4 only 2 metres between that place and Charles Taylor's own
10:24:52 5 bedroom. The communication room, if you want me to give an
6 estimation, it's a 2 metres square room approximately. So I was
7 just in front of the communication room when I was making tea, I
8 was just sitting in front of the communication room, against the
9 communication room.

10:25:20 10 Q. Listening to top secret radio communications being
11 broadcast out of the room for the benefit of anybody who happened
12 to be passing by; is that what you're telling us?

13 A. What don't you understand in this? I was sitting there. I
14 was sitting there in that room and I intercepted at occasion
10:26:05 15 communications from the ULIMO because it made in Mandinka. At
16 two to three occasions I had to listen to what they were saying.
17 I don't know why you think that it's so extraordinary.

18 Q. Mr Camara, you told us the other day that you were able to
19 listen to secret communications. I'm simply suggesting to you
10:26:37 20 that that is nonsense. That someone in your position, especially
21 when they were carrying out the role of making a cup of tea,
22 would not possibly be allowed to listen to such communications.
23 That's the simple point. Am I right or am I wrong?

24 A. You're wrong.

10:27:06 25 Q. Thank you. Can I move on to something else, please.
26 Morris Kallon you mentioned in your evidence when Mr Werner was
27 taking you through it. What happened to Morris Kallon?

28 A. I left Morris Kallon in Gbarnga. When I left Gbarnga in
29 1996 he was in Gbarnga.

1 Q. Yes, what happened to him?

2 A. In 2002 - I asked some people news of Mr Morris Kallon and
3 they told me that he was killed. I left - when I left he was
4 still alive in Gbarnga - in Liberia, I'm sorry.

10:28:08 5 Q. And who were these people who told you that Morris Kallon
6 had been killed?

7 A. My colleagues who were there, Liberian soldiers. It's the
8 Liberian soldiers in fact who told me, but I don't know if it's
9 true or not. They just told me that he was killed.

10:28:41 10 Q. Let me just understand this correctly. When you went back
11 to Liberia, you say in 2002, Liberian soldiers told you that
12 Morris Kallon had been killed?

13 A. Yes, that's what I told you. It's the Liberian soldiers
14 who told me that Morris Kallon was killed.

10:29:11 15 Q. Have you ever been given any other information since 2002
16 about what happened to Morris Kallon?

17 A. No, no, I haven't heard anything since.

18 Q. So you're not aware that he is currently on trial in
19 Freetown in Sierra Leone before another division of this very
10:29:37 20 Court?

21 A. I heard that there was a Morris Kallon in Sierra Leone, but
22 I don't know if it's the same Morris Kallon or not because I
23 haven't seen him. I don't know if it's the same Morris Kallon.
24 I don't know if it's the same Morris Kallon I have met.

10:30:07 25 Q. Do you think there might have been two commanders in the
26 RUF called Morris Kallon and you just happened to meet one of
27 them? Is that what you're saying?

28 A. I don't know. He's not the only - I don't think he's the
29 only Morris Kallon in Sierra Leone. I don't know.

1 Q. How many RUF commanders called Morris Kallon are you aware
2 of?

3 A. I didn't have any assignment in Sierra Leone. I don't know
4 Sierra Leone. I don't even know if there were other Morris
10:30:53 5 Kallon in Sierra Leone. I cannot confirm that.

6 PRESIDING JUDGE: Mr Witness, counsel asked you if you knew
7 of RUF commanders called Morris Kallon. He didn't ask about
8 Sierra Leone.

9 THE WITNESS: I said that I heard of a certain Morris
10:31:21 10 Kallon in Sierra Leone, but I don't know if it's the same Morris
11 Kallon that I met in the Lofa Defence Force. I don't know. I
12 can't tell you.

13 MR MUNYARD:

14 Q. I am going to move on to something else now, please,
10:31:35 15 Mr Camara. Yesterday you told us that when the investigators
16 from this Court came to see you first of all they wanted to know
17 all the occasions on which you had seen Charles Taylor. Do you
18 remember telling us that?

19 A. Yes, I do remember.

10:31:59 20 Q. And when you were first seen by them you told them that
21 you'd met him in Libya?

22 A. Yes, I've seen - I saw Charles Taylor in Libya.

23 Q. You also told the investigators on that first occasion that
24 you had gone to Burkina Faso?

10:32:33 25 A. Yes, yes, I've been to Burkina Faso.

26 Q. And you also told the investigators on that first occasion
27 that Charles Taylor had been in Burkina Faso and had met with
28 your leader Dr Manneh. Do you remember telling them that?

29 A. Can you clarify?

1 Q. Yes, I'm trying to summarise the areas that you told - the
2 subject matter that you told the investigators about in these
3 different interviews. If you want me to take you to a particular
4 page then I can do so, but for the moment, Mr Camara, I'm simply
10:33:28 5 trying to summarise the issues concerning Mr Taylor that you told
6 the investigators about. Do you follow? Tell me if you don't
7 understand what I'm saying.

8 A. Yes, I understand. Charles and Dr Manneh indeed met in
9 Burkina. They had a meeting in Burkina but I was not present so
10:33:59 10 I was not present at that meeting.

11 Q. Well, I will take you please to tab number 1, page 23628.
12 Now can you see that page on the screen?

13 A. Yes, I see the page.

14 Q. I want you to go seven lines down from the top. We have
10:35:00 15 looked at this before.

16 A. Down, you said?

17 Q. Seven lines down from the top of the page. In this first
18 part of the page you were telling the investigators about your
19 time in Libya being trained and then how you departed from Libya
10:35:27 20 and do you see a sentence that starts, "Due to the political
21 nature of the world"? Do you see that seven lines down from the
22 top? Mr Camara, take your time but let us know when you've got
23 to that sentence.

24 A. Go down please. Yes, yes, I see the sentence.

10:36:08 25 Q. So you were telling the investigators in the first
26 interview when you were telling them all about each time you'd
27 seen Charles Taylor, you said:

28 "Due to the political nature of the world at that time
29 towards Gaddafi the groups were asked to leave Libya in 1989.

1 They were transported by Libyan cargo plans from Tripoli to
2 Ouagadougou, Burkina Faso. When they arrived in Burkina Faso
3 Sanyang, Dr Manneh, and Taylor met and made an agreement to work
4 together as brothers and a plan was formed. He", that's you,
10:36:51 5 were not present for the meeting but you were briefed on this by
6 your leader Sanyang along with all the other Gambians.

7 I'm going to miss out the next two lines. You told the
8 investigators then that Dr Manneh told you that you should
9 combine with Taylor and Sankoh to gain support, "Taylor was the
10:37:17 10 leader and he and Sankoh and Dr Manneh sat together to make the
11 plan to work together in war or peace. And the plan was to enter
12 Liberia and take control of Nimba, Bong and Lofa counties which
13 would pave the way for Sankoh to launch his attack into Sierra
14 Leone."

10:37:42 15 Pausing there. You told the investigators in that very
16 first interview of how you had left Libya and gone to Burkina
17 Faso and your leader Dr Manneh told you that he and Mr Taylor had
18 had a meeting and made a plan, but you hadn't been at that
19 meeting. You agree with all of that, I'm sure?

10:38:17 20 A. Yes, yes, it's my leader who briefed me.

21 Q. Then the very last two lines on that page please at the
22 very bottom. You told them that Dr Manneh was based in Burkina
23 Faso during this time, "and we were told to do as Charles Taylor
24 wanted us to do". Do you see that?

10:38:46 25 A. Yes.

26 Q. Turn over the page to page 23629. I'm going to start three
27 lines down:

28 "Camara advises that from being within the movement he was
29 able to make his own analysis of how Taylor was given the strong

1 position amongst the three separate leaders and this he says
2 comes from the support of Blaise Compaore from Burkina Faso and
3 Kofi Balawa of the Ivory Coast."

4 Just pausing there for a moment, who is Kofi Balawa?

10:39:37 5 A. There is - I think there is a spelling mistake. What I
6 said - what I said, what I told the investigators, I said it was
7 Felix Houphouet-Boigny, President of Cote d'Ivoire.

8 JUDGE SEBUTINDE: We could use some spellings here, please.

9 MR MUNYARD: Certainly, your Honour. Kofi, K-O-F-I. Yes,
10:40:20 10 I think it's Felix Houphouet-Boigny you want.

11 THE WITNESS: I said called Felix Houphouet-Boigny.

12 MR WERNER: I can assist, your Honour, if you need it.

13 MR MUNYARD: I would defer to Mr Werner in any French names
14 or words of any sort.

10:40:36 15 MR WERNER: I'm happy do so. So Felix, F-E-L-I-X,
16 Houphouet would be H-O-U-P-H-O-U-E-T, and Boigny would be
17 B-O-I-G-N-Y.

18 MR MUNYARD:

19 Q. So the investigators got the name completely wrong despite
10:41:15 20 the fact that you told them that it was Felix Houphouet-Boigny.
21 Is that what you're saying?

22 A. It's a mistake, a spelling mistake I think.

23 Q. Who made the mistake, you or the investigators?

24 A. It's the investigators who made the mistake.

10:41:43 25 Q. Right, that's Mr Berry and Mr Haddad in October 2006. Just
26 have a look, please, while we're on this subject, at tab 4, page
27 30770. Do you have that on your screen, Mr Camara?

28 A. Yes, I have the page, yes.

29 Q. I'd like you to look at the last three lines of that page.

1 Now this is an interview in April of 2007. It's the fourth time
2 you'd been interviewed and we see that there's one investigator
3 the same as the first interview, Mr Berry, and then a different
4 investigator Mr Morris. Do you see at the foot of that page

10:43:13 5 what's been recorded is:

6 "The witness", that's you, "clarified that when he had
7 earlier mentioned that Charles Taylor had support of other
8 leaders it was the support of Blaise Compaore and Kofi Balawa,
9 first elected president of Ivory Coast after independence."

10:43:35 10 Did you tell these two gentlemen in April of 2007 that the
11 first elected president of Ivory Coast was a man called Kofi
12 Balawa?

13 A. I told them, yeah, I spoke about the first elected
14 president but I said it was Felix Houphouet-Boigny.

10:44:09 15 Q. Now if we can go back please to page 23629 in tab 1. This
16 is where you were telling the investigators for the first time of
17 all of your sightings of Charles Taylor and where we left off in
18 the second paragraph in that page you then went on to describe
19 your duties when you were in Liberia and I'm not going to go
10:44:50 20 through them, but on that page you then move from Burkina Faso to
21 your time in Liberia.

22 Then you're interviewed again for the second time the
23 following month in November and that's in tab 2 starting at page
24 25321 and again we've looked at quite a lot of this yesterday.

10:45:28 25 I'm going to take you to page 25323. On that page you deal again
26 with your training in Libya and at the foot of that page you say
27 that, and I'm looking at the last paragraph on page 2532 - you
28 talk about the numbers of people being trained in Libya and then
29 three lines from the bottom you say that that they were the first

1 group who left in late 1989 from Libya to Burkina Faso and that
2 you left in the second group from Libya to Burkina Faso in late
3 1990.

4 Over the page on 25324 you talk again of your time in
10:46:42 5 Burkina Faso and about the meeting between the three leaders and
6 what Dr Manneh told you and then over the page on 25325 you again
7 talk about your time in Burkina Faso and in the sentence starting
8 four lines from the top you said this - let me just pause before
9 I read it to make sure that you're following. Have you got page
10:47:37 10 25325 on the screen?

11 A. Yes, I have it.

12 Q. Can you see four lines down from the top a sentence that
13 starts, "That the reason he stated that Dr Manneh"?

14 A. Yes, I see the sentence.

10:47:51 15 Q. "That the reason he stated that Dr Manneh told them to take
16 orders from Taylor was because he was the strongest and Sankoh
17 was not vocal. He personally witnessed Taylor giving orders to
18 all the fighters including Gambians and Sierra Leoneans, that
19 even Sankoh was taking orders from the Liberian commanders."

10:48:20 20 Then further down the page you talk again about Taylor
21 having support of Blaise Compaore and the leader of the Ivory
22 Coast and then you go on to talk about your time in Liberia. Do
23 you see that?

24 A. Yes, I see the page.

10:48:40 25 Q. In the third interview, tab 3 starting on page 26942, now
26 in February of 2007, did the investigators Mr Berry and Mr Haddad
27 tell you why they had come to see you for yet a third time,
28 having already interviewed you twice? Did they say why it was
29 that they wanted to see you yet again?

1 A. The reason why they wanted to see me, actually I don't
2 remember even if they have told me.

3 Q. Did they want you to give them more information about
4 seeing Charles Taylor?

10:49:52 5 A. It's possible.

6 Q. It's very likely, isn't it? More than possible?

7 A. Yes, I said it's quite possible.

8 Q. They wanted you to give them more about Charles Taylor each
9 time they came to see you, didn't they?

10:50:30 10 A. I cannot confirm unless you ask the investigators
11 themselves. It's possible.

12 Q. In that third interview you were asked about your time in
13 Libya and the people who went to Burkina Faso. That's correct,
14 isn't it?

10:50:51 15 A. Yes, yes, they've asked about people who went to Burkina
16 Faso.

17 Q. So you were being asked about both of those places in the
18 third interview as well as Liberia. Do you agree?

19 A. What did you say, please?

10:51:15 20 Q. In the third interview you were again being asked about
21 Libya and Burkina Faso?

22 A. Yes, yes, they've asked me about both places.

23 Q. And the reason that they were there was very possibly
24 because they wanted you to give more information about

10:51:34 25 Charles Taylor. I think you've already confirmed that,
26 Mr Camara. Do you agree?

27 A. It's possible. I said it's possible.

28 Q. Turn please then to the fourth interview, tab 4 starting on
29 30770. Now in April of last year. They were asking you again

1 about what you knew of what Charles Taylor was doing in Libya.

2 On that first page you talk again about Mr Taylor and Dr Manneh
3 sleeping at the Mahtaba?

4 A. Yes, they were sleeping at the Mahtaba, because I found
10:52:40 5 them there. I saw them there.

6 Q. At the foot of that page, something we've looked at
7 already, you talk again about the presidents of Burkina Faso and
8 Cote d'Ivoire. That's right, isn't it?

9 A. Yes, I did say that.

10:53:03 10 Q. So you were reminded of your time in Burkina Faso in that
11 fourth interview, weren't you?

12 A. Yes, yes, they've asked me questions about it.

13 Q. Can we move on then please to the fifth interview in May of
14 2007. It's right, isn't it, that it wasn't until this fifth

10:53:49 15 interview that you say anything at all to the investigators about
16 how you flew in a plane with Charles Taylor and a load of weapons
17 and ammunition from Burkina Faso down to Man in Cote d'Ivoire?

18 A. Yes, indeed we took the same plane together to go to Cote
19 d'Ivoire.

10:54:16 20 Q. Well, I accept that it's in there, your story about how you
21 flew down in this plane --

22 PRESIDING JUDGE: Mr Munyard, could you refer us to the
23 precise passage.

24 MR MUNYARD: Certainly, Madam President. It starts at the
10:54:33 25 foot of page 38049. It's the very last line and it is the last
26 six words, "It was now late in 1991", going over to 38050:

27 Q. It's only in that interview that you remember being told by
28 Dr Manneh to get ready to fly down from Ouagadougou in a plane
29 including Charles Taylor and a load of weapons and ammunition,

1 yes?

2 A. Yes, yes. Yeah, he informed me in the morning that I would
3 be travelling with Charles Taylor.

4 Q. How long did the flight last?

10:55:33 5 A. I can't tell you how long exactly.

6 Q. More than five minutes?

7 A. More than that.

8 Q. How long were you waiting at the airport with
9 Charles Taylor and his party before you boarded the plane?

10:56:04 10 A. We waited for a long time for Charles Taylor and his
11 convoy.

12 Q. And when they arrived how long did you spend at the airport
13 with them before you boarded the plane?

14 A. Not for a long time. When he arrived they just boarded -
10:56:34 15 we left when they checked the luggage on board the plane.

16 Q. And you were on the plane with Mr Taylor and his party all
17 the way from Ouagadougou to Man in Cote d'Ivoire, yes?

18 A. From Ouagadougou to Man, yes, we were in the same plane.

19 Q. This whole event came completely out of the blue one
10:57:07 20 evening late in 1991, didn't it? When I say out of the blue I
21 mean it came completely unexpectedly that Dr Manneh suddenly told
22 you, "We've got to be ready to travel tomorrow with
23 Charles Taylor"?

24 A. Yes.

10:57:30 25 Q. It was a very big surprise to you that Dr Manneh told you
26 to get ready to travel at such short notice with the leader of
27 the Liberians. Is that right?

28 A. Yes, because I was not informed at all before, because he
29 had said that we are going for communication training at Poh,

1 that's between Burkina and Ghana.

2 Q. Yes, it was a very big surprise and would you agree that it
3 was a very dramatic event and if you want me to explain what I
4 mean by dramatic event I will?

10:58:25 5 A. Yes, yes, yes, of course, if you can explain.

6 Q. It was an event that was unexpected?

7 A. Yes.

8 Q. Highly unusual?

9 A. I don't understand what you're saying.

10:59:01 10 Q. Were you shocked to be told by Dr Manneh that you had to
11 pack because you were leaving in the morning and you were leaving
12 with Charles Taylor?

13 A. Yes.

14 Q. And it's right, isn't it, that this is the only time that
10:59:26 15 you have flown in a plane with Charles Taylor?

16 A. Yes, that was my first time to travel with Charles Taylor.

17 Q. That was your only time to travel in a plane with
18 Charles Taylor, wasn't it?

19 A. Yes, yes, that was the only time that I travelled on board
10:59:57 20 the same plane with Charles Taylor.

21 Q. And the only other occasions on which you had ever seen him
22 were for five minutes on two occasions in January 1990 when you
23 saw him talking with Dr Manneh at the reception of the Mahtaba.
24 That's what you've told this Court during the course of your

11:00:31 25 evidence. So this trip to the Cote d'Ivoire from Burkina Faso
26 was the longest time you had spent either in his company or
27 seeing him in your life at that point, wasn't it?

28 A. Yes, that was the first time I travelled with
29 Charles Taylor aboard the same plane for as - for such a long

1 time.

2 Q. And could you see him on board the plane during the plane
3 journey?

4 A. Yes, I saw him.

11:01:21 5 Q. Can you explain to the learned judges how it is that in the
6 first interview in October, the second interview in November of
7 2006, the third interview in February of 2007 and the fourth
8 interview of April 2007 you had completely forgotten about this
9 episode when you were told just the night before that you had to
11:01:59 10 pack your bags because you were going flying from Burkina Faso to
11 Cote d'Ivoire and then on to Liberia with none other than
12 Charles Taylor. How was it that you managed to forget this very
13 surprising and lengthy time that you spent with him in those four
14 previous interviews?

11:02:34 15 A. I didn't thought I was going to Liberia. I thought we were
16 staying in Burkina. I didn't know that we had some people in
17 Liberia. I didn't think of going to Liberia.

18 Q. Right, would you now answer the question, please?

19 A. Which question?

11:03:20 20 Q. The one I asked you. How is it that you managed to forget
21 this dramatic departure from Burkina Faso at just an evening's
22 notice in the company of none other than Charles Taylor who you
23 had only ever seen for two brief moments in January of 1990, how
24 is that when the investigators asked you on those four previous
11:03:52 25 occasions to tell them all that you could about your sighting of
26 Charles Taylor did you forget to mention this dramatic episode of
27 flying from Burkina Faso down to Cote d'Ivoire with him?

28 A. That was a long time ago. Personally I cannot put things
29 into record. You know, I needed maybe suggestion to know that

1 things happened. I have no special records of what happened and,
2 you know, people forget.

3 Q. Well, did somebody suggest to you that there might have
4 been another occasion when you'd seen Charles Taylor because so
11:05:03 5 far all that you'd given them was a tiny little bit of a sighting
6 on two occasions in January 1990? Did someone suggest to you
7 that they needed more from you about your dealings with
8 Charles Taylor?

9 A. No, no, no, nobody suggested that to me.

11:05:35 10 Q. Because I'm going to say to you directly you are lying when
11 you say that you flew in a plane anywhere with Charles Taylor,
12 least of all down to Cote d'Ivoire from Burkina Faso?

13 A. That's what you are saying but Charles Taylor who is
14 sitting there cannot say that. I can swear that I am telling the
11:06:15 15 truth. I am saying what I have seen, what I have heard. It's
16 not because I'm scared of you that I'm going to lie in this
17 Court. I'm telling what I know.

18 Q. You've told us a great deal of what other people have told
19 you, haven't you?

11:06:43 20 A. Yes, I am telling you what I have heard also, what I have
21 seen and what I have done.

22 Q. And what other people have told you?

23 A. What I have heard, that's what I'm telling you.

24 Q. Stories you've heard from other people, you've told us
11:07:09 25 quite a lot of those, haven't you, not just things you've seen or
26 heard yourself directly?

27 THE INTERPRETER: Can the witness repeat, please.

28 THE WITNESS: That's your own opinion, sir. That's not my
29 opinion and Charles Taylor knows that I'm not lying, that I'm not

1 a liar.

2 MR MUNYARD:

3 Q. I'm putting to you for the last time that Charles Taylor's
4 case is that you are lying and whether or not you flew down in a
11:07:52 5 plane with a load of arms from Burkina Faso I can't say, but
6 Charles Taylor was certainly not on any plane with you. That's
7 the truth, isn't it?

8 A. Charles Taylor can say that today because at that time - in
9 this position now he can say. I know that what I told you, I
11:08:39 10 have told you what I know.

11 Q. Mr Camara, can I ask you for the last time how come you
12 forgot to tell the investigators this dramatic story in the
13 first, the second, the third and the fourth interview?

14 A. I said in my statement that when I left Burkina
11:09:16 15 Charles Taylor - at that time Charles Taylor was in Burkina. My
16 leader Dr Manneh told me that after the communication training we
17 will go to Liberia.

18 Q. I'm going to interrupt you. Did you understand my
19 question? How come you forgot to mention this dramatic incident
11:09:42 20 in the first, second, third and fourth occasions when you were
21 interviewed?

22 A. It is in my interview, in my statement that I left Burkina
23 Faso with Charles Taylor to go to Liberia.

24 Q. Are you deliberately trying not to answer the question?

11:10:13 25 A. What do you want me to say? It's in my statement.

26 Q. Why didn't you mention it before the fifth interview?

27 A. I told them that when I was - when I was telling them that
28 I left Burkina to go to Liberia.

29 Q. I'm going to move on. Now I want to ask you questions

1 about the circumstances of you leaving Liberia. Why did you
2 leave in 1996?

3 A. I had - I left with my leader Dr Manneh, our group - the
4 members of our group wanted us to go to Senegal because at that
11:11:38 5 time we couldn't go to Gambia. We wanted Senegal to play the
6 intermediary for our group to be able to enter Gambia. That's
7 why I left Liberia in 1996.

8 Q. So you left Liberia in 1996 because you wanted to go back
9 to The Gambia, not because you were fed up with your leader
11:12:25 10 Dr Manneh. Is that right?

11 A. At that time we were - we had enough of the problems in
12 Liberia.

13 Q. Did you leave Liberia because you were fed up with
14 Dr Manneh or did you leave Liberia because you wanted to go back
11:12:57 15 to The Gambia with Dr Manneh? Which is it?

16 A. That time we had the problems and difficulties we had in
17 Liberia, we're the only ones who know. You don't know what we
18 went through, but we know.

19 Q. Turn to tab 1, please, page 23632. Do you have that page
11:13:55 20 in front of you on the screen?

21 A. Tab 1?

22 Q. 23632 and can you count down from the top of the page 10
23 lines down where you'll see a sentence that starts, "That he
24 returned to Gambia in 1996". Do you see that sentence there? Do
11:14:37 25 you have that, Mr Camara?

26 A. Yes, yes, I've seen it.

27 Q. And this is what you told the interviewers in the first
28 interview:

29 "That he returned to Gambia in 1996 and was placed in jail

1 for three and a half years by his government before he was
2 released. He returned because he was fed up as his leader
3 Dr Manneh never came to give them encouragement and Taylor was
4 just using them for anything he wanted."

11:15:12 5 A. Yes, that's what I said.

6 Q. So you were fed up with Dr Manneh, were you?

7 A. Yes, because even Charles Taylor - I mean, left - there was
8 a --

9 THE INTERPRETER: Can the witness speak more slowly,
11:15:43 10 please, and repeat slowly.

11 PRESIDING JUDGE: Mr Witness, please repeat your answer
12 slowly to allow the interpreter to hear you properly.

13 THE WITNESS: I'm telling you that there was a treason
14 since the last meeting of our leader in 2002 - no, in 1992, in
11:16:21 15 1992. Since that meeting, when he left us at that meeting he
16 never came back because of Charles Taylor. Since that meeting,
17 as I said, we haven't seen our leader any more until 1996 when he
18 came to Cote d'Ivoire. Even in 1996 he just sent some
19 informations to people in Liberia. He didn't come in person.

11:17:10 20 MR MUNYARD:

21 Q. When in 1996 did you leave The Gambia?

22 A. Liberia. I left Liberia in 1996. I think it was around 18
23 April or end - end April to beginning of May. Yeah, it was
24 around end - by end April.

11:17:42 25 Q. I'm sorry, I should have said when did you leave for The
26 Gambia. But you say it was around April, beginning of May?

27 A. Yes, by end April. If my memory serves me right it was at
28 that time that he came to Cote d'Ivoire.

29 JUDGE SEBUTINDE: Mr Munyard, there is a word Madam

1 Interpreter said that I think nobody understood. When the
2 witness said, "I am telling you that there was a" something
3 "since the last meeting of our leader". Madam Interpreter, you
4 said a word that was not discerned. I personally didn't
11:18:32 5 understand what you said. Line 22 of the record.

6 THE WITNESS: Sorry, can I repeat? I think it was in 1992.

7 THE INTERPRETER: Can the witness repeat that part the
8 judge is talking about?

9 THE WITNESS: Dr Manneh came to Liberia, we had a meeting
11:19:02 10 with him in Buchanan. After Buchanan, before he left Buchanan
11 it's Charles Taylor who disgraced Dr Manneh in Liberia. That's
12 why I talked about treason.

13 JUDGE SEBUTINDE: You talked about what?

14 PRESIDING JUDGE: Treason.

11:19:38 15 THE INTERPRETER: The judge was asking about treason.

16 JUDGE SEBUTINDE: Madam Interpreter, is that "treason"?

17 THE INTERPRETER: Yes, he said that Charles Taylor
18 disgraced Dr Manneh in Liberia.

19 JUDGE SEBUTINDE: Please continue, thank you.

11:19:51 20 THE WITNESS: Since he disgraced our leader, when he
21 disgraced him in Liberia, he left the country. He never came
22 back. He came back only in 1996 and even that, he just went to
23 Cote d'Ivoire. He went to Cote d'Ivoire and sent us a message in
24 Liberia. We came to Danane and it's at that time he said that
11:20:43 25 the President of Gambia was there and that he had discussions
26 with the President of Senegal for him to negotiate for us for our
27 group to be able to go back. But even at that meeting we
28 Gambians did not agree because Charles Taylor had some of them
29 with him because he gave them some privileges and they thought

1 they should stay with him.

2 MR MUNYARD:

3 Q. Mr Camara, some of the Gambians did stay. They married and
4 stayed in Liberia and made their homes there, didn't they?

11:21:43 5 A. That was when the fight was going on. It's during the war
6 that they had children. Even myself I had children during the
7 war.

8 Q. And some of the Gambians wanted to go back to The Gambia to
9 see if they could overthrow the new government, didn't they?

11:22:09 10 A. I don't know. I don't know about that. I don't know
11 anything about that.

12 Q. Well, I'm now going to ask you a little more about when you
13 left and what happened. Could you have a look, please, at tab 2
14 page 25328. Right in the middle of the page do you see a three
11:22:58 15 line paragraph that starts, "That when he left Liberia"? Have
16 you got that, Mr Camara?

17 A. Yes, yes, yes, I got it.

18 Q. And it reads as follows:

19 "That when he left Liberia in around February of 1996 he
11:23:22 20 went to Senegal first where he was arrested around August as a
21 dissident. He was later extradited to The Gambia around 1 July
22 1997."

23 Now I'm not going to ask you about that for the moment.

24 I'm going to ask you to look at another passage in tab 3, page
11:23:52 25 26943, right at the bottom of this page, please. Mr Camara, at
26 the very bottom of this page, the last two lines, do you see a
27 sentence that starts on the second line to the last, "After that
28 training was completed"? Do you see that sentence?

29 "After that training was completed he was reassigned to

1 Charles Taylor's Mansion Grounds in Gbarnga for security under
2 Mustapha Jallow. That he stayed there until he came back to The
3 Gambia around November/December of 1996."

4 A. Yes, I see the passage.

11:24:51 5 Q. Now did you leave in February of 1996 as we saw in the
6 first of those two passages or did you stay at the Mansion
7 Grounds until November/December of 1996 before leaving for The
8 Gambia?

9 A. No, no. I left Liberia at the beginning of the year 1996.
11:25:28 10 Beginning of 1996.

11 Q. So can you explain how the investigators have recorded you
12 saying in that third interview that you stayed at the Mansion
13 Grounds until you came back to The Gambia around
14 November/December of 1996?

11:25:52 15 A. It might be a mistake made by the investigators.

16 Q. Another one. Another mistake by the investigators?

17 A. No, the year is correct but not the months, not
18 November/December.

19 Q. The month is a mistake is what you're saying, isn't it?

11:26:23 20 A. Yes, that's what I'm telling you. I left at the beginning
21 of 1996.

22 Q. So when it was read back to you why didn't you tell them,
23 "No, it wasn't the end of the year, it was at the beginning of
24 the year"?

11:26:48 25 A. It's possible that maybe I didn't hear it, I misheard it.
26 It's possible.

27 Q. Do you know where Charles Taylor was in 1996, what part of
28 the world he was in?

29 A. Before we leave Liberia, around that period Charles Taylor

1 left Gbarnga for Monrovia. He left Gbarnga for Monrovia. I
2 think it's the second week after that we left Liberia. At that
3 time - at that time he entered Monrovia. I don't know if it was
4 as a vice-president or not.

11:28:04 5 MR MUNYARD: Madam President, I will pursue this after the
6 morning break because I imagine the tape is about to run out.

7 PRESIDING JUDGE: I think we've got three minutes left on
8 the tape, but as it is approaching our normal break time and this
9 is a convenient point we will take a break now. Mr Witness, we
11:28:20 10 are going to take the usual mid-morning break and we will resume
11 at 12.00.

12 [Break taken at 11.30 a.m.]

13 [Upon resuming at 12.00 p.m.]

14 PRESIDING JUDGE: Mr Munyard, please proceed.

11:59:42 15 MR MUNYARD: Thank you, your Honour:

16 Q. Mr Camara, when do you say it was that Mr Taylor left
17 Gbarnga and went to Monrovia to take part in the provisional
18 government?

19 A. I said that Taylor left to Gbarnga in 1996 to go to
12:00:14 20 Monrovia. I think it was December and we left Liberia two weeks
21 afterwards to go to Cote d'Ivoire, and from there to Senegal.

22 Q. In other words, it was December 1995?

23 A. No, December 1996.

24 Q. You were in prison in Senegal in December 1996. Is that
12:01:01 25 something you have forgotten about?

26 A. 1996 I was in Senegal, in December. Yes, I went into
27 detention in that period in December.

28 Q. So you can't have any direct knowledge of what Mr Taylor
29 was doing in December 1996 unless he was sharing a cell with you

1 in a prison in Senegal, can you?

2 A. I told that in 1996 we left, I think around April, Liberia.
3 At that time he went to Monrovia.

4 Q. He had already gone --

12:02:10 5 JUDGE SEBUTINDE: Sorry, Mr Munyard, is it "we left" or "he
6 left"? Madam Interpreter, what was the interpretation? "I told
7 you that in 1996 we left", or "he left"?

8 THE INTERPRETER: Can the witness repeat, please?

9 THE WITNESS: We left together with our group to Cote
12:02:40 10 d'Ivoire.

11 MR MUNYARD:

12 Q. And Mr Taylor had already gone, by the end of 1995, to
13 Monrovia, hadn't he?

14 A. Yes, he left at that time.

12:03:03 15 Q. He left at the end of 1995, I am suggesting, several months
16 before you left for Senegal.

17 A. I remember I have the date of 1996 in mind.

18 Q. Do you agree that you might have got the date of
19 Mr Taylor's departure from Monrovia wrong?

12:03:39 20 A. Yes, yes, it is possible. I can't mean - it might be a
21 mistake, but I do remember it was in 1996.

22 Q. I am going to move on now to your journey from Liberia to
23 the Gambia. You told us that you went to Senegal and that your
24 leader, Dr Manneh, tried to enter negotiations whilst in Senegal.

12:04:08 25 First of all, can you just help us with this: Are you related to
26 Dr Manneh? Are you family connected to him?

27 A. Can you please repeat? I didn't get the question.

28 Q. Is Dr Manneh related to you via your family in some way?

29 A. Yes, in a way, but not close family because his dad is

1 comton [phon] Sanyang and my mother is from comton Sanyang. In
2 our culture his father is from our place.

3 Q. Who was he negotiating with in Senegal?

4 PRESIDING JUDGE: I was just going to ask for a spelling of
12:05:19 5 that, possibly a place, or Sanyang.

6 MR MUNYARD: The spelling won't come from me, Madam
7 President.

8 PRESIDING JUDGE: Mr Witness, can you tell us how to spell
9 comton Sanyang, please?

12:05:37 10 THE WITNESS: S-A-N-Y-A-N-G.

11 JUDGE SEBUTINDE: And "comton", that word "comton", what is
12 it?

13 THE WITNESS: Surname.

14 JUDGE SEBUTINDE: Spell it, please.

12:06:02 15 THE WITNESS: Comton is a surname. It is a surname.

16 JUDGE SEBUTINDE: Can you please spell that surname for us,
17 Mr Witness?

18 THE WITNESS: It is comton Sanyang. His dad is a comton
19 Sanyang, my mother also is comton Sanyang.

12:06:40 20 THE INTERPRETER: Can you spell it, Mr Witness?

21 JUDGE SEBUTINDE: The word "comton", something like that,
22 please spell that word.

23 THE WITNESS: Comton is a Mandinka word. It is not an
24 English word. It is a surname.

12:07:13 25 JUDGE SEBUTINDE: Well, how can we record it if you can't
26 spell it for us? Can't you spell it in Mandinka?

27 THE WITNESS: So you want me to write the Mandinka for you?

28 MR WERNER: Your Honours, my understanding is that in
29 Mandinka "comton" means surname. That is why the witness is

1 confused.

2 PRESIDING JUDGE: Thank you for that. Mr Munyard,
3 I interrupted you. You were asking about a negotiation.

4 MR MUNYARD: I am going to defer to Mr Werner on all
12:07:54 5 matters Mandinka in future, as well as French:

6 Q. Who was it that Dr Manneh was negotiating with in Senegal?

7 A. The President was Abdou Diouf at that moment, but the
8 person who was our leader, the leader of the delegation, he was
9 called General Wane, General Wane. He was the one who was the
12:08:35 10 chief of delegation.

11 Q. What was it that these people were negotiating for in
12 Senegal?

13 A. General Wane went twice to Gambia, but he gave us some
14 conditions.

12:09:21 15 JUDGE SEBUTINDE: I understand that General Wane is not
16 spelt as O-N-E, is that correct? It is W-A-N-E.

17 THE WITNESS: No, it is W-A-N-E. But the conditions fixed
18 with General Wane in Gambia, we could not agree on those
19 conditions, according to the explanation he himself gave us.

12:10:35 20 MR MUNYARD:

21 Q. Mr Camara, you had done nothing at all against the State of
22 Gambia, had you?

23 A. If - I didn't do anything against the government.

24 Q. When you left the Gambia you had not been involved with the
12:11:12 25 group that was behind the coup attempt in 1981, had you?

26 A. No, I was not involved in the 1981 coup d'etat. I joined
27 them in Libya.

28 Q. When you left the Gambia you had not been involved with the
29 group who had made the attempted coup in 1981, had you? You left

1 the Gambia, not for that reason but because you wanted to better
2 yourself financially. That is right, isn't it?

3 A. Yes, that is right.

4 Q. By the time you left Liberia in 1996 the government of the
12:12:11 5 Gambia had changed completely, hadn't it, from when you were
6 there in 1986?

7 A. Yes, that is true.

8 Q. Indeed, it has changed as a result of a successful coup by
9 Yahya Jammeh?

12:12:39 10 A. Yes, that is true.

11 Q. Senegal in 1996 was no longer part of a confederation with
12 the Gambia, was it?

13 A. Yes, that is true.

14 Q. So why was it that anybody had to negotiate for your return
12:13:07 15 into the Gambia in 1996? You personally I am talking about.

16 A. Because at that time I was in detention and then I was also
17 involved in the problems in Liberia, so at that time it was not
18 easy to go back to the Gambia because of the government in place
19 in the country.

12:13:58 20 Q. You were not in detention when you went first to Senegal,
21 were you?

22 A. No, no, they didn't arrest me.

23 Q. As I understand it from the passage we looked at earlier in
24 tab 2, at page 25328 - I am not going to ask for it to be shown
12:14:35 25 again, we have all seen it this morning - you left Liberia and
26 went to Senegal first and you were not arrested there until
27 August. So, is this right: That you were in Senegal for a while
28 before you were arrested?

29 A. Yes, yes, that is true.

1 Q. What was it that you were doing in Senegal that caused them
2 to arrest you?

3 A. General Wane had given us conditions for our return to
4 Gambia and then we didn't agree with those conditions, so they
12:15:30 5 told the leaders that they were going to continue the
6 negotiations. We were there until one day the gendarmes came in
7 where we were living in Tamba Kunda and they arrested members of
8 our group and they said they had suspected that we were involved
9 in a coup d'etat, preparation of a coup d'etat, in Gambia. That
12:16:25 10 is why they arrested us.

11 Q. Why did you never tell the investigators that you were
12 arrested because the authorities said you were plotting another
13 coup in Gambia?

14 A. I answered to the questions they put to me, that was all.

12:16:58 15 Q. Mr Camara, the investigators wouldn't know what it was you
16 were doing in Senegal. Only you could tell them why you were in
17 Senegal and why you were imprisoned and you didn't tell them that
18 you had been imprisoned because you were believed to be plotting
19 another coup d'etat in the Gambia.

12:17:26 20 A. I told them that I was arrested, that I was in detention.

21 Q. Yes, and you told them that you were arrested because you
22 were a dissident?

23 A. Yes, yes, that is why I was arrested.

24 Q. "Dissident" doesn't tell the investigators what it was that
12:17:49 25 you were suspected of doing, does it?

26 A. We were just negotiating because they were the ones who
27 suspected us of plotting a coup d'etat. That was their
28 suspicions.

29 Q. You and Dr Manneh, and your little group, had moved on from

1 Liberia and you actually conducted a raid into the Gambia from
2 Senegal, didn't you, and that is what led to your arrest in
3 Senegal?

4 A. That is not true.

12:18:28 5 Q. Did any of your group, under Dr Manneh, conduct a raid into
6 the Gambia in 1996?

7 A. That raid happened at a moment when we were in detention,
8 but everybody was not arrested in fact. Those who were not
9 arrested, when we were in prison, four months detention, we heard
12:19:12 10 that those people who were not arrested, six persons, those are
11 the ones who conducted the invasion in Gambia, the attack in
12 Gambia. They are the ones who did that because they couldn't
13 enter Gambia and they couldn't stay in Senegal, and they had no
14 papers, they had no IDs.

12:19:45 15 Q. Did these people include the great leader, Dr Manneh?

16 A. I don't know. I can't say because at that time I was in
17 detention. I was in detention. I had been in detention for four
18 months at that time.

19 Q. Did Dr Manneh get taken into detention, or did he manage to
12:20:12 20 escape?

21 A. According to my knowledge, Dr Manneh was able to escape.
22 He was not arrested and he went, I think, to Charles Taylor.

23 Q. He wasn't in custody with you when you were arrested in
24 Senegal. Is that what you are saying?

12:20:57 25 A. Yes, that is what I am saying.

26 Q. And the rest of it is just what somebody else has told you?

27 A. I was in prison at that time, so nobody told me that.

28 Q. You just told us that Charles Taylor - sorry, that
29 Dr Manneh went back to Charles Taylor, but since you were in

1 prison you couldn't have seen that yourself so somebody must have
2 told you that. Do you follow?

3 A. I said that Dr Manneh and the men with whom he escaped from
4 Senegal, Charles Taylor knows that person. That was in 2002 when
12:21:51 5 I left Liberia. That was the guy in - who was commander of the
6 ATU base. He was called Livingstone in Liberia.

7 Q. So it was Mr Livingstone who told you the story of
8 Dr Manneh leaving Senegal and going back to Charles Taylor. Is
9 that what you are telling the Court?

12:22:26 10 A. No, it is Livingstone who went to Liberia and Livingstone
11 was Taylor's in-law.

12 Q. I am not going to pursue this, Mr Camara, but I wonder do
13 you understand the difference between telling the Court something
14 you actually did, or saw, or heard yourself and something that
12:22:46 15 somebody else has told you about?

16 A. I said that Dr Manneh didn't go to Liberia, no, that is not
17 the case. It is in fact Livingstone who went to Liberia, who
18 escaped to Liberia. No, it was not Dr Manneh who went to
19 Liberia.

12:23:19 20 Q. So Livingstone told you later, did he, that he had escaped
21 and gone to Liberia?

22 A. Yes.

23 Q. In other words, another story from another person?

24 A. I saw - I found the man there and he is the one who told
12:23:43 25 me.

26 Q. You were imprisoned in Senegal in what month?

27 A. If my memory serves me right, I think it was - I spent
28 three months before I was arrested in Senegal.

29 Q. You said in the passage we read earlier that you were

1 arrested around August. Now, in what part of the year does
2 August fall: Beginning, middle, or end?

3 A. It is mid.

12:24:37 4 Q. Right, and you are not extradited to the Gambia until
5 nearly a year later, are you?

6 A. Yes.

7 Q. And for what reason were you extradited to the Gambia and
8 then sentenced to three and a half years imprisonment in the
9 Gambia?

12:25:02 10 A. That is the - an agreement between Gambia and Senegal.

11 Q. What was the offence for which you were imprisoned in
12 Senegal and then imprisoned in the Gambia? What was it that you
13 were convicted of doing in the Gambia?

14 A. I have not done anything. I was a detainee, I was not a
12:25:30 15 prisoner. I didn't do anything to go to court.

16 Q. You were given a three and a half year sentence, weren't
17 you?

18 A. No, they just detained me for three years and five months.
19 They didn't try me and I have papers to prove that, to prove what
12:26:00 20 I am saying.

21 Q. What was the reason why you were detained for all that time
22 in the Gambia?

23 A. At that time they were enquiring, making investigation, to
24 see whether I was telling them the truth, or not.

12:26:28 25 Q. Are you telling the Court that it took them three and a
26 half years to decide whether or not you were telling the truth?

27 A. Yes.

28 Q. You had been part of Dr Manneh's latest plot to overthrow
29 the government of the Gambia, hadn't you, after you left Liberia?

1 A. We never did a coup d'etat in Gambia. We never fomented a
2 coup d'etat. It is Charles Taylor who pushed us. It was because
3 of Charles Taylor that we were involved in the problems in
4 Liberia and who created us problems also because Dawda Jawara at
12:27:28 5 that time didn't want to hear of Charles Taylor.

6 Q. Dawda Jawara was overthrown in a coup in 1994.

7 A. Yes, yes, that was a coup d'etat. That is a coup d'etat.
8 That is why I am talking about coup d'etat.

9 Q. So how has Dawda Jawara got anything to do with your
12:27:53 10 leaving Liberia in 1996, either February, April, or November,
11 depending on which of your accounts to the investigators is
12 accepted? How has Dawda Jawara got anything to do with your
13 leaving Liberia?

14 A. Jawara was not - Jawara had nothing to do with my staying
12:28:22 15 in Liberia.

16 Q. When you were arrested in Senegal and then imprisoned in
17 the Gambia, your leader, Dr Manneh, managed to run away and leave
18 you, the foot soldiers, behind to get caught, didn't he?

19 A. I left - when I left Dr Manneh was in Banta. Dr Manneh was
12:28:53 20 not arrested at the same time as me.

21 Q. Dr Manneh wasn't arrested at all, was he?

22 A. No, he was not arrested.

23 Q. After you had been arrested in Senegal, were you hoping
24 that Charles Taylor would try and negotiate your release?

12:29:24 25 A. No, no, that was not the case.

26 Q. Isn't that what Dr Manneh went back to Liberia to see
27 Charles Taylor about: To try to get you out of prison in either
28 Senegal, or later in the Gambia?

29 A. That is you who are saying that. I didn't say that

1 Dr Manneh went to Liberia for that.

2 Q. I am suggesting that that is what went on, Mr Camara: That
3 your great leader ran back to Liberia, after you had been
4 arrested with your fellow foot soldiers, and - just a minute -
12:30:17 5 hoped to be able to get Charles Taylor to persuade the Gambian,
6 or the Senegalese authorities to release you. You knew that was
7 happening, didn't you?

8 A. That is what you are saying. That is your opinion. That
9 is not my opinion. I am telling you what I know. I had - I was
12:30:47 10 not counting on Charles Taylor.

11 Q. You were counting on Dr Manneh though, weren't you?

12 A. No, no. I knew that I had not done anything.

13 Q. So you were hoping that Dr Manneh would be able to persuade
14 the authorities that you had not done anything. That is right,
12:31:15 15 isn't it?

16 A. We have democracy in that part of the world. If you
17 haven't done anything then you will not have any problem. I knew
18 that - you know, it would have taken long but in the end they
19 would have released me because I didn't do anything. I knew that
12:31:39 20 I would be released.

21 Q. Mr Camara, what sort of democracy is it that locks you up
22 from August 1996 to December 2000 if you have not done anything?

23 A. That is - maybe you should ask our government. I know that
24 I didn't do anything and they didn't - nobody came to tell me
12:32:15 25 that I did - I committed a specific crime.

26 Q. Nobody came with the key to let you out of the cell for
27 those four years or more, did they?

28 A. I was released in 2002 - 2000, sorry.

29 Q. Yes and from halfway through 1996 to the end of 2000 is

1 four and a half years.

2 A. I was detained but I was - my mind at peace because I knew
3 that I would be released. I didn't do anything.

4 Q. And you were angry that your leader had not been able to
12:33:10 5 get Charles Taylor to get you out of detention for all those
6 years, weren't you? You thought it was the least that
7 Charles Taylor could do for you after the time you had spent in
8 Liberia.

9 A. This is what you are saying. 2002 I left Liberia.

12:33:47 10 Q. Giving evidence against him now is your payback time, isn't
11 it?

12 A. No, it is not a matter of vengeance. I don't wish him
13 anything bad. I am just saying what he did.

14 Q. Let us look at when you returned to Liberia, please. Madam
12:34:18 15 Court Attendant, can you turn to tab 2, page 25326. Do you see
16 the top part of that page on your screen, Mr Camara?

17 A. Yes, I see that part.

18 Q. I would like you to look at the second paragraph that
19 starts three lines down from the top. Do you have that? It
12:35:13 20 starts, "That while he was at Cobra Base". Do you see that
21 paragraph?

22 A. Yes, I see that paragraph.

23 Q. I want you to look at the second sentence.

24 A. Yes.

12:35:33 25 Q. You told the investigators that you noted that when you
26 returned in 2001 to 2003 "they were still training Sierra
27 Leoneans at the base." This is your return to the Cobra Base.
28 Did you return to Liberia in 2001?

29 A. It was in 2002.

1 Q. So why did you tell the investigators that you returned in
2 2001?

3 A. Maybe it is again a mistake. It was in 2002.

4 Q. Whose mistake, Mr Camara, yours or theirs?

12:36:32 5 A. Those who took my statement.

6 Q. Yet another mistake on their part, is it?

7 A. You yourself, I was telling you that you yourself made some
8 mistakes here and you were saying - you were apologising for it,
9 so I cannot blame you for that. It is 2002 and not 2001. That
12:37:10 10 should be corrected.

11 Q. When in 2002 do you say you returned to Liberia?

12 A. I think it was by the middle of the year, middle to end of
13 the year, if I remember well. Yes, by the end of the year.

14 Q. Could it have been as late as 2003?

12:37:54 15 A. No, no. I said by the end of year 2002.

16 Q. Are you quite sure about that?

17 A. Yes, I am quite sure about it.

18 Q. Could you turn, please, to tab 3, page 26950. Tab 3,
19 26950. Do you have that on the screen, Mr Camara?

12:38:56 20 A. Yes, I see that page.

21 Q. I want you to go down to the third paragraph that starts
22 with the words "He advises". Do you see that?

23 A. Yes, yes, I see the passage.

24 Q. I am not concerned with the first few words, but the second
12:39:33 25 half of that sentence, referring to you, says, "Before he
26 returned to Liberia in January/February of 2003 from the Gambia."

27 I am sorry, the microphone is on, it is just not picking it up.

28 THE INTERPRETER: Sorry, I forgot to close my microphone,
29 sorry.

1 MR MUNYARD: I will do it again:

2 Q. Do you see that sentence there? Have you read it to
3 yourself, Mr Camara?

4 A. It was 2002.

12:40:17 5 Q. Have you read that sentence to yourself, yes or no?

6 A. No, I have not read it.

7 Q. Please read the first sentence of the third paragraph to
8 yourself and I will then ask you a question about it when you
9 tell us that you have read it.

12:40:54 10 A. Yes, I have read it.

11 Q. You were telling the investigators in that interview that
12 you returned to Liberia in January or February of 2003 from the
13 Gambia, weren't you?

14 A. I said I arrived in 2002.

12:41:23 15 Q. Are you telling the Court that you said that to the
16 investigators, but they then invented January/February of 2003?

17 A. I said 2002. I arrived in Liberia in 2002.

18 Q. Please listen to my question: Do you agree that the
19 investigators have written down there that you told them you

12:41:55 20 returned to Liberia in January/February of 2003? Do you agree
21 that is what is written there?

22 A. I said I returned to Liberia in 2002.

23 Q. Are you deliberately avoiding the question?

24 A. I told you, I am telling you that I returned to Liberia in
12:42:28 25 2002.

26 Q. Mr Camara, you are going to stay there until I get an
27 answer to the question I asked. Look at the printed page,
28 please.

29 A. If they have made a mistake, I don't know, I cannot say,

1 but I know that I returned to Liberia in 2002.

2 Q. Is it written there that you told the investigators that
3 you returned to Liberia in January/February of 2003 from the
4 Gambia? Is that written there?

12:43:12 5 A. That is what is written, but I told them that I returned
6 there in 2002.

7 Q. So have the investigators invented the fact that you
8 returned to Liberia in January/February of 2003? Have they made
9 that up?

12:43:43 10 A. What is written there is - but the dates, there is a
11 mistake in the date, but the rest is correct.

12 Q. Have they invented the fact that you returned in
13 January/February of 2003, yes or no?

14 A. I am telling you that it is a mistake, the date that they
12:44:26 15 have written there.

16 Q. You didn't tell them that you had returned in
17 January/February of 2002, did you?

18 A. I told them 2002. I think they made a mistake saying that
19 it was in 2003.

12:44:48 20 Q. No, you didn't tell them that you had returned to Liberia
21 in January/February of 2002, did you?

22 A. I told you I didn't say that. I told them 2002.

23 Q. So it is not a question of them simply getting the year
24 wrong, they have also got the months wrong. Is that what you are
12:45:18 25 saying?

26 A. I am telling you this is not correct: The months and the
27 year. The rest is correct, exact.

28 Q. Can you think of any reason why the investigators would
29 write down something as specific as January/February of 2003 if

1 all you told them was that you returned in 2002?

2 A. It might be - I told you it might be a mistake. It is
3 maybe a mistake.

4 Q. Can you think of any reason why they would have made that
12:46:11 5 very specific mistake?

6 A. I can just tell you that it is a mistake, the rest I really
7 don't know.

8 Q. The fact is you obviously told them that, didn't you?

9 A. No, I told them that I returned there in 2002.

12:46:44 10 Q. The only sensible explanation for that appearing on that
11 page is that you gave that information to the investigators,
12 would you agree?

13 A. Yes, I am the one who told them to write it.

14 Q. I am not sure, Madam President, if that "yes" was agreeing
12:47:11 15 with me or not, but I am going to move on from this.

16 PRESIDING JUDGE: Please do, Mr Munyard. I think we have
17 explored it well.

18 MR MUNYARD: Sure. Can we move on to tab 8, please:

19 Q. Before we actually look at tab 8 can I ask you this,
12:47:38 20 Mr Camara: You told us, it seems like a long time ago now, but
21 you told us when I was first asking you questions that when you
22 were seen by investigators from this Court you received no
23 benefits whatsoever except that your expenses were reimbursed.
24 Do you remember saying that?

12:48:11 25 A. The benefits you are talking about, they didn't give me
26 anything. You asked me if they had given me anything. I said
27 that they paid my transport, but they didn't give me anything.
28 They didn't give me any bribe. They didn't tell me that they
29 were going to give me something if I accepted to testify.

1 Q. What you actually said was that you had never been given
2 anything other than the reimbursement of your expenses.

3 A. Yes, that is the answer I gave you when you were talking
4 about benefits I received. When you asked me if I had received
12:49:08 5 any benefits, or money, I told you that they didn't give me -
6 they didn't promise me anything and they didn't tell me they were
7 going to give me something. They just reimbursed my transport
8 costs.

9 Q. In 2006 --

12:49:34 10 MR WERNER: Sorry, your Honours. He said something
11 further.

12 THE INTERPRETER: And they gave him also some assistance.

13 THE WITNESS: They paid my transport, for my transport and
14 then they gave me a little assistance.

12:49:59 15 MR MUNYARD:

16 Q. "They gave me a little assistance" is something new and
17 different from what you told us last week. Do you remember,
18 Mr Camara, saying to us last week, when I asked you the question,
19 "They have reimbursed your expenses, but they have not given you
12:50:21 20 anything else in addition, is that right?", that your reply was,
21 "Tell him that exactly that is what happens."

22 A. I am telling you, if my memory serves me right, the
23 question you asked was that did the investigators promise
24 anything to me for me to accept to testify. That was the
12:50:55 25 question you asked. I told you no. I told you that they paid
26 for my transport and they gave me some assistance.

27 Q. You never told us that they gave you some assistance when
28 I asked you these questions that first afternoon that I was
29 questioning you.

1 A. Maybe it is the way you put the question to me, but it is
2 normal that they pay for my transport and they gave me some
3 assistance.

4 Q. What I asked you - and I am reading from the transcript -
12:51:52 5 was, "Have you, in fact, ever received any benefit of any sort
6 for giving information to the Special Court investigators, or
7 lawyers?" Your reply was as follows, "Tell him that these
8 people, the investigators, normally when they came to the Gambia,
9 what I can say, what I have from them was that my fare to go and
12:52:22 10 come used to be refunded because I pay my own fare to see them.
11 Apart from that I had no benefit from them." Today you are
12 telling us that apart from that you did have some benefit from
13 them in the form of some assistance. Why didn't you tell us,
14 when I first asked you the questions, that you had some benefit
12:52:58 15 in addition to the reimbursement of your expenses?

16 A. What do you mean by benefits? If you say benefits that
17 means that I am in a deal with them when you talk about benefits
18 and there was no deal between me and them. There is no business
19 whatsoever between me and them. That is what I understood by
12:53:36 20 benefits.

21 Q. Mr Camara, you made it very plain, I suggest, on Monday
22 afternoon that the only money you ever received from the
23 investigators was the reimbursement of your expenses and nothing
24 else. Do you agree?

12:54:10 25 A. They have given me - they have refunded my transport fares,
26 but I don't think of that in terms of benefits because there was
27 no deal between us. You must be thinking that there was a deal
28 between them and myself.

29 Q. Don't worry about what I may or may not be thinking.

1 Concentrate, please, on the question.

2 A. I am telling you I am giving you my opinion. I am not -
3 you thought that I was maybe in business with these people and
4 that I got some benefits from them. That was not the case.

12:55:06 5 Q. Mr Camara, don't trouble yourself with what might be going
6 on in my head. On Monday I asked you, "Were you given to
7 understand by the investigators that there would be any benefit
8 for you, of any sort, if you were to tell them - if you were to
9 answer their questions, or give them information?" That is the
12:55:34 10 question I asked and this was your reply, "Tell him that what
11 I was told by the investigators was that this is - this is
12 something voluntary if you want to join, but I was not promised
13 for anything that they will give me something, no."

14 A. That is what I told you. I told you that nobody promised
12:55:58 15 me anything.

16 Q. I then asked you the following question, "Have you ever had
17 any benefit for giving information to the Special Court
18 investigators?" You replied as follows, "Tell him that you are
19 not hearing what I am telling you. I said I am not looking for
12:56:22 20 any interest for this and I was not promised that they were going
21 to give me something if I give evidence."

22 A. That is what I said. Nobody promised any benefit. When
23 you talk about benefit that means, according to me, that means
24 that there is something going on, a business, or a deal.

12:56:45 25 Q. I then went on to ask you the following question, "I am
26 going to ask you the question one more time only. It is a very
27 simple question. Have you ever received any benefit for giving
28 information to the investigators?" Now, at that point Mr Werner
29 intervened and said that you had already answered the question.

1 The Presiding Judge replied to Mr Werner as follows, "He didn't
2 actually, Mr Werner. The first question was in the future, were
3 you promised at the time, and this one is have you had any
4 benefit? They are two different questions." The learned judge
12:57:40 5 then allowed me to ask you the question once again. I asked you
6 the question again, "Have you, in fact, ever received any benefit
7 of any sort for giving information to the Special Court
8 investigators, or lawyers?"

9 You did not at any stage say, "What do you mean by
12:58:07 10 benefit?" You gave the answer that I first read out to you when
11 I began to ask you these questions. You gave the answer, "I used
12 to be refunded because I pay my own fare to see them. Apart from
13 that I had no benefit from them. When I leave they do not send
14 anything to me in the Gambia as benefit." So in your mind you
12:58:37 15 knew perfectly well what benefit meant, didn't you, on Monday
16 afternoon?

17 A. What is benefit according to you? Because benefit, for me,
18 is when you are in a deal with somebody. Assistance and benefit,
19 for me, are two different things according - in my opinion, in
12:59:12 20 fact. So, the way you understand benefit is completely different
21 from the way I understand it.

22 Q. Just in case that was the position I then went on to ask
23 you a further question so that we could all be absolutely clear.
24 The question I asked was this, "So the position is this: That
12:59:44 25 they have reimbursed your expenses, but they have not given you
26 anything else in addition, is that right?" To which you replied,
27 "Tell him that exactly that is what happens."

28 A. That is - you said benefit. That is why I answered yes.

29 Q. Mr Camara, I did not mention benefit in that last question.

1 I am going to repeat it to you so that you understand what
2 I asked and what your answer was on Monday afternoon. The
3 question I put was as follows, "So the position is this: That
4 they have reimbursed your expenses, but they have not given you
13:00:46 5 anything else in addition, is that right?" And your answer,
6 "Tell him that exactly that is what happens."
7 A. Yes, that is what I said. They refunded my transport
8 costs, but the amount they gave me was a kind of assistance,
9 assistance for me, because since I have started seeing them they
13:01:14 10 said that it was on a voluntary basis so something which is
11 voluntary, whatever they give you is assistance.
12 Q. Do you mean over and above your travel expenses they have
13 given you assistance?
14 A. Yes, that is assistance only. For me that is not benefit
13:01:53 15 because it was on a voluntary basis, so the amount they gave me
16 was a kind of assistance.
17 Q. Do not get bogged down with benefit. We have moved on from
18 benefit. The answer that you gave us on Monday was therefore
19 untrue, wasn't it?
13:02:18 20 A. No, no, no, that is not true.
21 Q. You were first interviewed in 2006 in October and November.
22 Did you incur expenses in 2006 when you were being interviewed in
23 the Gambia?
24 A. Yes, I got some assistance, help from them.
13:02:47 25 Q. I want you to be absolutely clear about this. This is the
26 first time they ever come to see you and then a month later they
27 come again. Now, just let me ask you this first of all: When
28 the investigators first made contact with you was it by letter,
29 by telephone, or did someone turn up at your house and say they

1 wanted to see you and interview you? How was contact first made?

2 A. The way I happened to know these people, the way they
3 learnt of my - I was in Gambia. I don't know how they learnt
4 that I was in Gambia. I just saw them when they came in the
13:03:47 5 Gambia. They got my telephone number, they called me and I went
6 to meet them.

7 Q. And when you went to meet them did that involve you having
8 to travel at your own expense?

9 A. I went to meet them and the place I reside are completely
13:04:27 10 two different areas.

11 Q. Right, we don't need to know where you reside, or where you
12 went to meet them, but did it involve you having to spend money
13 in order to go and meet them in this other place?

14 A. Yes, I paid. I paid my own transport to go and meet them
13:04:58 15 in a different village.

16 Q. Was that transport by road, or by rail, or for that matter
17 by air?

18 A. By car.

19 Q. Did it involve you staying overnight anywhere?

13:05:32 20 A. Yes, indeed. It is because I wanted to stay overnight, but
21 I could have come back the same day.

22 Q. Were you given expenses for your overnight stay?

23 A. They didn't even know that I would be spending the night.
24 I didn't tell them that.

13:06:08 25 Q. So they didn't give you any overnight expenses for that
26 first interview. Is that what you are telling us?

27 A. They gave me something, but I didn't tell them that I was
28 spending the night somewhere.

29 Q. All right, let us just be clear on what they gave you. Did

1 they give you money - did you have to pay to travel by car? Was
2 it like a taxi?

3 A. Yes, yes, I had to hire a car.

4 Q. You had to pay for that. Did you also - did you get
13:06:55 5 reimbursed for that?

6 A. Yes, it was refunded.

7 Q. Did you get a meal allowance for that day?

8 A. Yes, because the amount they gave me exceeded my transport
9 cost. I knew that it was more than what I spent, so I thought
13:07:32 10 that the rest was a kind of assistance.

11 Q. What currency were you paid in?

12 A. Sorry, can you repeat that question, please?

13 Q. Certainly. What currency were you paid in? What kind of
14 money? Was it Gambian money, or was it United States dollars, or
13:08:02 15 what was it?

16 A. They gave me some assistance. US dollars, in US dollars.

17 JUDGE SEBUTINDE: Mr Munyard, I am just concerned and I am
18 seeking guidance from Madam Interpreter. Is the witness using
19 the word "assistance" or "subsistence"?

13:08:35 20 THE INTERPRETER: In fact it is assistance, help
21 assistance, not subsistence.

22 MR MUNYARD: Thank you, your Honour:

23 Q. What was the amount of this assistance, over and above the
24 cost of you having to hire the car?

13:09:05 25 A. They gave me 100 US dollars.

26 Q. On top of the money that you had spent hiring the car, is
27 that right?

28 A. I always paid my transport myself. Since I have left my
29 village, until I arrived, I always paid - I always paid my

1 transport. They gave me the money and told me that it was as a
2 refund and the effort also I made to come and meet them.

3 Q. So you were reimbursed your expenses and you were rewarded
4 for giving them information. Would you agree with that?

13:10:21 5 A. Yes, that was not a payment.

6 Q. You were reimbursed your expenses, the cost of the hire
7 car, and, to use your words, you were also given money for "the
8 effort" you made to come and meet them?

9 A. Yes.

13:11:01 10 Q. So you were rewarded for the effort in coming to be
11 interviewed?

12 A. Yes.

13 Q. And the amount of the reward, was it 100 US dollars only,
14 or was it 100 US dollars and the cost of the hire car?

13:11:34 15 PRESIDING JUDGE: [Overlapping speakers].

16 THE WITNESS: Yes, yes, yes.

17 JUDGE SEBUTINDE: What exactly do you mean, Mr Witness?
18 Two propositions were put before you, which of these two
19 propositions are you agreeing with?

13:11:59 20 THE WITNESS: Can you repeat?

21 MR MUNYARD: I will repeat the question:

22 Q. Were you given a total sum of 100 US dollars, or were you
23 given 100 US dollars and, on top of that, the cost to you of
24 hiring the car?

13:12:31 25 A. They gave me 100 US dollars as a compensation for the
26 efforts I made and for my transport. That is what happened, in
27 my opinion.

28 PRESIDING JUDGE: Mr Witness, does that mean you got a
29 total of 100 dollars?

1 A. Yes, yes, exactly. That is what they gave me. That is
2 what they gave me the first time I went to see them and whenever
3 I met them later on they gave me some help.

4 MR MUNYARD:

13:13:31 5 Q. Did you pay for the cost of the hire car in Gambian
6 currency, your own money?

7 A. That is - in Gambia we use the dallasi. You cannot use the
8 US dollars, so I had to pay in dallasi.

9 MR MUNYARD: Madam Interpreter, it has come out on the
13:14:03 10 screen as "in Gambia we use the dollars"?

11 THE INTERPRETER: No, the dallasi, the dallasi.

12 MR MUNYARD: It is a different word that needs to be typed
13 onto the transcript:

14 Q. Mr Camara could you spell the dallasi, please, the unit of
13:14:18 15 Gambian currency?

16 A. D-A-L-L-A-S-I, dallasi.

17 Q. Thank you. How many dallasis did you have to pay, roughly
18 speaking, for the hire car?

19 A. I am going to give you an estimation then: Something like
13:15:11 20 500 dallasi from my village to the meeting point.

21 Q. And how many dallasis are there to one US dollar?

22 A. At that time the dollar was not so high. I think it was
23 something like 1,000 - it amounted to something like 1,700-1,800
24 dallasis at that time.

13:16:19 25 Q. So the rest of the 100 US dollars was your reward for being
26 interviewed. That is correct, isn't it?

27 A. Yes, yes, I already told you that it was a compensation for
28 the efforts I made and the transport I had to pay for.

29 Q. The next time they saw you did they see you in the same

1 place? Again, I don't need to know the identity of the place,
2 but did they see you in the same meeting point, or somewhere
3 different?

4 A. Yes, yes, I used to meet them at a hotel. I used to meet
13:17:22 5 them at their hotel.

6 Q. Did you stay overnight on the second occasion, now November
7 of 2006?

8 A. No, I didn't spend the night. No, no, no, I never spent
9 the night there.

13:17:47 10 Q. So what were your expenses on the second visit? Was it
11 just the hire of a car and a meal?

12 A. Normally when I see them, when I meet with them, when - if
13 my memory serves me right, because they usually give me 100
14 dollars, US dollars.

13:18:27 15 Q. Do you think that is what you got in November of 2006?

16 A. I don't remember exactly the exact date, but --

17 Q. Don't [overlapping speakers].

18 A. They came on one of the occasions and on that occasion
19 I told them about problems of the education of my kids and on
13:19:15 20 that occasion they gave me some assistance also. I remember
21 that. They told me that if I had any problems I could tell them
22 so that they would try to help me.

23 Q. Help you financially you mean?

24 A. Yes, yes. They gave me something for my kids.

13:19:53 25 Q. I just want to be clear about the second time you were
26 interviewed. Do you think now that you received 100 US dollars
27 on that second occasion?

28 A. I didn't put that on record. I didn't record the - but
29 sometimes they gave me dollars, but some other times also when

1 they knew they had dallasis they would give me dallasis.

2 Q. Mr Camara, I know that it was a while ago and I am not
3 expecting that you necessarily kept records, but I just want to
4 be clear, if we can be, do you think that on the second occasion,
13:20:55 5 the second interview, also in 2006, that you were paid another
6 100 US dollars?

7 A. Yes, they gave me dollars, but I can't tell you exactly on
8 which occasions because sometimes they gave me dallasis also.

9 Q. Right. There is a reason for me asking you about those
13:21:23 10 first two occasions and I can tell you it is this: That we have
11 been supplied with written records of the money that you
12 received, but the written records do not indicate that you
13 received anything at all in 2006, so that is why I am having to
14 ask you rather more questions about those first two interviews.

13:21:58 15 A. Yes, indeed, they gave me something.

16 Q. Now, can I ask you to look at tab 8, please. On the first
17 page of tab 8 we are looking at a document headed "Special Court
18 of Sierra Leone, all Disbursements for Witness" and on the
19 left-hand side, underneath the crest of the Special Court, there
13:22:52 20 is an indicator "TF1-548" and we know that that is an indication
21 that you are the witness that this document is concerned with.
22 Do you understand that?

23 A. Yes, I do understand.

24 Q. Have you ever seen this document, or something like it
13:23:18 25 before?

26 A. No, they usually gave me a paper to sign to acknowledge
27 that I have received money from them in a form of assistance.

28 Q. I want us to look through this document, please. You will
29 see that there are a number of boxes on each page. There are

1 four boxes on each page. The first three on the first page have
2 not been filled in and so we start with box 4 and in that box we
3 can see the date of 27 February 2007. Now, I want to ask you
4 this: When you were interviewed were you given the money for
13:24:31 5 your expenses and your reward for giving information on the very
6 same day that you were interviewed? Did it always happen like
7 that?

8 A. They gave me that sum of money as compensation and for my
9 transport costs.

13:25:00 10 Q. Yes. Did they give it you on the day that the interview
11 finished?

12 A. Yes, when the interview finished they used to give me the
13 money at that time.

14 Q. Was there ever a time when they travelled to your village
13:25:28 15 to give you the money some time after you had been interviewed?

16 A. Coming to my village you said?

17 Q. Yes, did that ever happen?

18 A. No, no, no. I am the one who used to meet them on
19 appointment, no, but they don't know where - they don't know my
13:26:03 20 village.

21 Q. Was there ever a time when they didn't give you the money
22 after the interview and so you had to go back and see them again
23 to get the money on some later date?

24 A. Yes, possible.

13:26:23 25 Q. Did it happen? Anything is possible, did that actually
26 happen?

27 A. Yes, that happened.

28 Q. How did it happen? Did you travel - let us break it down,
29 first of all. After you had been interviewed, were there

1 occasions when they didn't give you the money even though the
2 interview had finished and you were ready to travel back to your
3 village?

4 A. Yes, that happened. They said it was on a voluntary basis.

13:27:12 5 I was not expecting them to give me something every time.

6 Q. Well, they always reimbursed your expenses, didn't they?

7 A. Yes, they did refund my expenses. They refunded my
8 expenses, yes.

9 Q. I just want you to help us with this before the break: Was
13:27:44 10 there ever a time when you were interviewed and they said at the
11 end of the interview, "Sorry, we can't give you the money now,
12 you will have to come back to see us in a couple of weeks time",
13 or a couple of days time, or anything like that? Did that ever
14 happen?

13:28:06 15 A. No, no. To my knowledge, usually when I met with them,
16 usually they would stay for three, four days in the Gambia and
17 sometimes at the end they would give me the money.

18 Q. At the end of the interview, or later at the end of their
19 stay?

13:28:39 20 A. Sometimes when they are about to leave the country, before
21 they leave the Gambia.

22 Q. Last question before the break: So you would have to go
23 back to your village and then come back again some time later to
24 see them to get your money. Is that what you are saying?

13:28:56 25 A. Yes.

26 MR MUNYARD: Madam President, on the computer it is about
27 one minute to go.

28 PRESIDING JUDGE: I am watching this clock, but we will not
29 split hairs, Mr Munyard.

1 MR MUNYARD: I am in the Court's hands.

2 PRESIDING JUDGE: We will take the lunchtime adjournment
3 and adjourn until 2.30. Madam Court Attendant, please adjourn
4 the Court.

13:29:23 5 [Lunch break taken at 1.30 p.m.]

6 [Upon resuming at 2.30 p.m.]

7 PRESIDING JUDGE: Mr Munyard? I apologise, Ms Hollis.

8 MS HOLLIS: No problem, Madam President. I just wish to
9 note that Nicholas Koumjian is not with us this afternoon.

14:29:56 10 Otherwise, the composition remains the same.

11 PRESIDING JUDGE: Thank you for that, Ms Hollis.

12 MR MUNYARD: No change on the Defence team:

13 Q. Mr Camara, can you have a look, please, at tab 8, and I am
14 going to ask Madam Court Officer to come over and put it on the

14:30:15 15 screen for you. Madam Court Officer, could you show us the lower
16 half of this document, please. Thank you. Mr Camara, if you

17 look at the fourth box, the bottom box, this is the first piece
18 of information that we on the Defence side have been given about

19 the money that was paid to you for assisting the Office of the
14:31:08 20 Prosecutor. You will see that the date there is Tuesday, 27

21 February 2007 and Mr Haddad, the investigator who you are

22 familiar with, has filled in some entries in that box, and what

23 we can see there is that for meals and communication and

24 transport you were paid 100 United States dollars. Do you see
14:31:54 25 that?

26 A. Yes, I see it.

27 Q. And the amount was approved by Mr Berry, who is the other
28 investigator who you are familiar with?

29 A. Yes, exactly.

1 Q. Now, we all understand what meals and transport are. I
2 know it is not your document, you haven't filled this in, but
3 have you any idea what "communication" refers to? You were given
4 money for meals, transport and communication. Do you know what
14:32:46 5 "communication" refers to there?

6 A. According to my understanding, I have been told that it was
7 the way we used to communicate with each other - with one
8 another.

9 Q. Why did that cost you money?

14:33:29 10 A. When I used to communicate by mobile phone with them and
11 mobile phone you need to subscribe.

12 Q. Did the investigators buy you a mobile phone?

13 A. No, I already had a mobile phone.

14 Q. So, this money is intended to cover the cost of your calls
14:34:00 15 to the investigators?

16 A. Yes, that is what I think.

17 Q. Right. And are you able to help us -- [Mobile phone
18 interference] Can I just check in case. Neither Dutch nor
19 English, not me. I am sorry, Mr Camara, we had a little bit of
14:34:34 20 interference from a foreign object. Appropriately enough it
21 would seem it was a mobile telephone. Can you just help us with
22 this. How much were your calls to the investigators in February
23 of 2007? In other words, how much of the \$100 was covering the
24 cost of your phone calls to the investigators in their hotel?

14:35:16 25 A. I didn't tell you that I was using the whole amount of 100
26 US dollars for only communications.

27 Q. No.

28 PRESIDING JUDGE: Well, Mr Witness, counsel is asking how
29 much - what part of that one hundred was used.

1 THE WITNESS: Actually, I can't tell you the exact amount.
2 I didn't calculate. I didn't think anybody was going to ask the
3 question - that question.

4 MR MUNYARD:

14:35:48 5 Q. Well, I don't want to spend a long time on it. [Mobile
6 phone interference] I think it is happening again, unless - I
7 don't want to spend a long time on this subject, but can you help
8 us with this. Did you make a couple of telephone calls to them,
9 or many more than that?

14:36:14 10 A. Yes, I made some calls to them and it was not very cheap.

11 PRESIDING JUDGE: Just before you proceed on, Mr Munyard,
12 can we just make sure that nobody has a mobile phone in the
13 Court, because I suspect it may be in the booths. That is what I
14 am thinking.

14:36:45 15 MR MUNYARD: Very well.

16 PRESIDING JUDGE: In which case if that is the case I would
17 be grateful if that could be checked. I am sorry to interrupt.
18 Please proceed.

19 MR MUNYARD: That is quite all right, Madam President:

14:37:03 20 Q. Mr Camara, can you just help us with this. Have you any
21 idea now how much - how many Dalasis, if I have got the currency
22 correct, you spent in making phone calls to the investigators?

23 A. I told you that I don't know the exact amount. I don't
24 remember the exact amount. I never thought that somebody was
14:37:35 25 going to ask me any question about that.

26 Q. All right, let me put it another way. Would I be right in
27 assuming that the cost of your meals, your transport and your
28 telephone calls translated into United States dollars would only
29 be a matter of a few dollars?

1 A. I don't - I can't tell you how much dollars it would be,
2 because I can't tell you the exact amount of my transport fare
3 and so actually I didn't calculate the amount of my communication
4 expenses.

14:38:26 5 Q. Was the transport fare the same as usual; the same as in
6 November and in October of 2006, the cost of car hire?

7 A. No.

8 Q. Was it less expensive, or more expensive?

9 A. More expensive on some occasions, so it depends. It really
14:39:03 10 depended on the number of days I would spend in the town.

11 Q. All right. Well, just tell us this. What was the most
12 amount of money that you spent on car hire when you were going to
13 see the investigators?

14 A. 1,500 Dalasi. Yes, I can remember on some occasions I
14:39:51 15 hired a car at around 1,500.

16 Q. Thank you. Sticking with box 4 on the first page, you are
17 paid this money on 27 February. Now, we know that you were
18 interviewed on 9 and 10 February. Are you saying that you were
19 not paid this money at the end of the interview, but that it
14:40:26 20 wasn't until another two and a half weeks later that you got the
21 money?

22 A. No, they gave me the amounts at the end of the interview.
23 They gave me the money when we finished the interview.

24 Q. Can you turn over the page, please, and we will look at box
14:41:03 25 5. Now this is a receipt dated Thursday, 1 March 2007, paid by
26 Mr Haddad and approved by Mr Berry, and the reason given for this
27 money being spent is "Investigations Interviews", the category is
28 "MEALS/COMMUNICATION/TRANSPORT" and the amount is 20.83 US
29 dollars. Now, were you interviewed - sorry, were you given money

1 each time you were interviewed, or were you given money between
2 interviews as well as at the end of each interview? And if you
3 want me to explain that to you again I am quite happy to do so.

14:42:20 4 A. I don't remember exactly. Sometimes they would give me at
5 the end of the interview. That is what I remember. Some - on
6 some occasions also they will give it to me during or before the
7 interview.

8 Q. Well 1 March is a long time before the next interview,
9 which was on 18 April 2007. Six - more than six weeks away from
14:42:49 10 the next interview. Is this the position, that every time you
11 were given money by the investigators you were interviewed by
12 them?

13 A. They came to The Gambia. When I went to see - to meet them
14 it is on those occasions that they used to give me the money, and
14:43:27 15 sometimes they would stay for a long time without coming to The
16 Gambia.

17 Q. But every time you went to meet them and got money from
18 them, you gave them some information. Is that correct?

19 A. Yes, if they asked me questions I would answer.

14:43:54 20 Q. And every time they asked you questions did they write down
21 notes of what it was you were telling them?

22 A. Yes, I saw them writing it down.

23 Q. And I don't suppose you can remember now what it was on the
24 1 March 2007 that you got \$20.83 for?

14:44:37 25 A. Yes, they gave me that amount of money.

26 Q. Yes, but do you remember what it was for?

27 A. I told you at the beginning already that my transport costs
28 expenses and assistance also as they gave me that amount for that
29 purpose.

1 Q. Mr Camara, all I am trying to find out is do you now
2 remember what it was you got that particular sum for in March of
3 2007? Do you remember anything about the occasion that led to
4 you being given that money?

14:45:42 5 A. Whenever they gave me money they would ask me to sign a
6 receipt. I have never read that it was for meals communication,
7 transport.

8 Q. All right. And whenever they gave you money it was because
9 you had given them information, correct?

14:46:09 10 A. It was on a voluntary basis. They gave me some assistance.
11 It was on a voluntary basis. They told me that it was on a
12 voluntary basis.

13 Q. Can I just go back to the question I asked you. Whenever
14 they gave you money, was it because you had given them
14:46:37 15 information?

16 A. It is possible, yes. It is possible. It is just possible
17 that they just wanted to help me.

18 Q. Well, sticking with box 5, it looks as though you have been
19 given money on that occasion for a very specific purpose for
14:47:14 20 meals, communication and transport. So does that suggest to you
21 that you travelled to see them and they reimbursed your expenses?

22 A. Yes, it is possible. That is what I am talking about
23 assistance. That is the assistance. That is what they have
24 written there.

14:47:45 25 Q. And the only reason that you would travel to see them would
26 be to give them information, correct?

27 A. No, not only that, because they used to interview me when
28 they were in town.

29 Q. I think we may be at cross-purposes here. When you say

1 they used to interview me when they were in town, do you mean
2 when you travelled to the town they were in they used to
3 interview you?

14:48:36 4 A. Unless they come to Gambia, I wouldn't see them. It is
5 when they came to The Gambia that I would meet them and it was
6 not always for an interview.

7 Q. For what other reasons would they - would you travel to see
8 them apart from for an interview?

14:49:10 9 A. I met them in The Gambia. The reason why they were in
10 Gambia, I wouldn't know that, because they just when they arrive
11 they used to just call me. So, I don't know for which purpose
12 exactly they came to The Gambia.

13 Q. Mr Camara, I wasn't asking you about their purpose. Just
14 listen, please, very carefully to the question. When they were
14:49:34 15 in The Gambia and you would travel from your village to see them
16 where they were staying, the purpose of your going there would be
17 so that you could give them information. Is that correct?

18 A. They used to come to The Gambia. It is not every time that
19 they interviewed me when they came to The Gambia.

14:50:19 20 Q. It may be me, Mr Camara, but I am not asking you about them
21 coming to The Gambia. I am really asking you about why you would
22 go to see them when they were in your country. Don't worry about
23 them being in The Gambia, or why they came there. Just answer
24 this question, if you can. Whenever you went to see them, was it
14:50:57 25 in order to give them some information?

26 A. No, no, not at all. When they came to The Gambia, when
27 they needed me they would call me. When they - and they would
28 tell many I that it was for an interview. They would tell me
29 that. If they didn't need me, if they didn't need me they would

1 tell me also.

2 Q. I am going to have one last attempt. You wouldn't ---

3 A. But I used to go and meet them personally because I knew
4 them.

14:51:50 5 Q. Are you telling the Court that you used to go and meet them
6 for social reasons?

7 A. In our culture when you know somebody then you have
8 relations. You know that person. That is our culture. We have
9 a certain social life. It is not that you meet somebody just

14:52:20 10 because when you need the person. When they came to the Gambia
11 and call me and tell me that they are there, and even if they
12 don't tell me to go there I just go there and meet them.

13 Q. In box 5 do you see what is recorded underneath the name of
14 A had dad as the reason why you were being paid your expenses?

14:52:56 15 Can you see what is written there against the word "Reason"?

16 A. Yes, I have seen it.

17 Q. What it is in English?

18 A. If I am not mistaken it is investigations interviews.

19 Q. Right. And so you were reimbursed travel expenses on 1

14:53:32 20 March 2007 because you went to assist these two investigators
21 with their investigations and interviews, correct?

22 A. Yes, it is possible because I don't remember all their
23 stays in the Gambia. It is possible.

24 Q. Mr Camara, no-one is expecting you to remember that. I am
14:54:01 25 just trying to find out for each of these occasions what you were
26 given the money for, do you follow?

27 A. Yes, it was on that occasion they gave me the money.

28 Q. Box 6, please?

29 A. Yes, I see box 6.

1 Q. Four days later, on 5 March 2007, Mr Haddad gave you 100 US
2 dollars for assistance rendered in the form of information. Do
3 you see that?

4 A. Yes, yes, I see that.

14:54:49 5 Q. Pausing there. In other words, you were paid money by the
6 investigators to give them information, do you agree?

7 A. It is an assistance. It was not a payment. You are using
8 payment. It was not a payment.

9 Q. Forget the word I used. You were given \$100 for giving the
14:55:23 10 investigators information, weren't you?

11 A. Yes, yes, they gave it to me because of that. For that.

12 Q. So, why was it that you told this Court on Monday of this
13 week that you were never paid for giving information to the
14 investigators?

14:55:53 15 A. I told you not to say that they have paid me. They didn't
16 pay me. It was - it was for assistance. It was not a payment.
17 Don't say that they paid me.

18 Q. What did they do with the 100 United States dollars on 5
19 March? How was it - how did it end up in your hands?

14:56:27 20 A. I am a chief of family. I have wives and kids. I am a
21 married man and I have a family. I have problems.

22 Q. Mr Camara, I don't think you are understanding. How did
23 the one pounds get from Mr Haddad's hand into your hand?

24 MR WERNER: US dollars, your Honours.

14:56:49 25 PRESIDING JUDGE: It is actually dollars [microphone not
26 activated].

27 MR MUNYARD: I may have slip --

28 PRESIDING JUDGE: A slip of the tongue, Mr Munyard. You
29 said pounds.

1 MR MUNYARD: I am so sorry.

2 PRESIDING JUDGE: Don't worry about it.

3 THE WITNESS: Yes, he gave me the money.

4 MR MUNYARD: Had it been in pounds it would have been worth

14:57:08 5 twice as much of course:

6 Q. He gave you the money. And we know from the entry that he
7 has made on that form that he gave it to you for giving them
8 information, yes? I don't know if that was --

9 A. Indeed. Indeed, that's what is written.

14:57:41 10 Q. And that's right, isn't it? You were paid 100 United
11 States dollars for providing assistance to the interviewers in
12 the form of information that you gave to them?

13 A. I was not paid. I told you please - I have asked you to
14 stop saying that I was paid.

14:58:05 15 Q. Let's use the word "given"?

16 A. I was not paid. They helped. It was an assistance.

17 Q. You were given 100 United States dollars for the
18 information that you gave them. Do you agree with that?

19 A. Yes, I agree with that.

14:58:22 20 Q. All right. I will try to stick to the expression "given".
21 Now did you give them information each time you were given \$100?

22 A. No, no.

23 Q. Were you given \$100 on 5 March because you gave them
24 information that day?

14:59:01 25 A. Yes. I already said yes. I said yes. They gave me
26 assistance.

27 Q. No, with respect, you gave them assistance. That's what
28 this box means. "Assistance rendered, information" means you
29 gave them assistance in the form of information?

1 A. Yes, me too, I answered to their questions. That is why I
2 am using the term "assistance".

3 Q. I don't think you're going to get any answers from that
4 side of the Courtroom, Mr Camara, so don't keep looking over
14:59:54 5 there. Look towards the judges, please. Now let us go to box 7.

6 THE INTERPRETER: Sorry, can the witness repeat?

7 PRESIDING JUDGE: Mr Witness, the interpreter didn't catch
8 what you said. Can you repeat it, please.

9 THE WITNESS: I am not looking at a particular person. I
15:00:33 10 am looking in the room, in the Courtroom.

11 MR MUNYARD:

12 Q. Look at the page now, please, box 7. Four days later on
13 Friday 9 March Mr Haddad gave you 50 United States dollars?

14 A. Yes, indeed.

15:00:56 15 Q. For assistance rendered by you to them. Do you agree?

16 A. Yes, I do agree.

17 Q. And it was in order to reimburse you for your meals, your
18 transportation, your telephone calls and then something called
19 assistance, this time assistance from them to you?

15:01:27 20 A. Yes.

21 Q. Do you know what their assistance to you was? How much of
22 the \$50 amounted to assistance? If you don't know, just say so?

23 A. It is exactly what is written there.

24 Q. Box number 8, please. Six days after that, on 15 March, Mr
15:02:08 25 Haddad gave you another 100 United States dollars. The reason --

26 A. Yes, that's true.

27 Q. The reason for it is the assistance rendered by you to them
28 and the money is to cover your transport, your loss of wages and
29 the information that you have given them. Transport we know

1 about - sorry?

2 A. Yes.

3 Q. Transport we know about. You told us yesterday that you
4 had not been in work I think from the time you got back from
15:02:57 5 Liberia in 2003. So what's lost wages here?

6 A. Yes, yes, indeed, I was not working.

7 Q. So you didn't have any loss of wages for which you had to
8 be compensated in March of last year?

9 A. Why don't you ask Haddad for that what he means by loss of
15:03:33 10 wages? He would explain it to you. What I know is that they
11 gave me assistance and they made me sign the receipt. They asked
12 me to sign and I signed. And then I have seen on the paper - I
13 have seen the lost wages written there, transport, loss of wages,
14 information. That I have seen. I have seen that on the paper.

15:04:04 15 I can't say that I haven't seen it.

16 Q. Did you tell them that you had lost earnings in coming to
17 see them at some point in March of 2007?

18 A. No, no, I don't - I didn't - I didn't go there for that.
19 I'm a cultivator.

15:04:40 20 Q. We know that you gave them more information that day
21 because it's recorded there. When you gave them information they
22 always wrote it down, you told us earlier, and so can we assume
23 that they wrote down what you told them on 15 March 2007?

24 A. Yes, that's what they have written down.

15:05:13 25 Q. Box 9, please, and I think Madam Court Officer will have to
26 move the page on the screen. We are now on the third page of
27 this document. Wednesday 18 April last year. This is a day when
28 we do have interview notes for, unlike the previous date we have
29 just been looking at, 15 March. On 18 April you were paid 100

1 United States dollars again and the reason you were paid that
2 money was because you had given them assistance in locating
3 people and in transportation and communication?

4 A. Yes, yes.

15:06:15 5 Q. It doesn't actually say there that you were given the money
6 for information, does it?

7 A. Yes, indeed. Indeed. It's not written there.

8 Q. Although we know that you did give them information that
9 day because for that particular day we do have interview notes?

15:06:45 10 A. Yes, it's possible.

11 Q. Box 10, please. On 24 May you were paid 57.69 United
12 States dollars. This was to cover family assistance to you?

13 A. Yes.

14 Q. The reason, what you had done for them, is a number 1,500.
15:07:29 15 Does that make any sense to you, the 1,500?

16 A. No, I don't know. They are the ones who know what it
17 means. I don't know what it means.

18 Q. Box 11, the same day, you are given 38.46 United States
19 dollars, this time for family assistance and transport and the
15:08:04 20 reason given there is 1,000 and I don't suppose that the 1,000
21 means anything to you in that box, does it, Mr Camara?

22 A. That you are talking about I don't - I really don't know,
23 but maybe - I don't know what they have written. I am not used
24 to what they are writing. I don't know their terms. I don't
15:08:42 25 know what they have written there.

26 Q. Yes, don't worry about that. I don't claim to know what it
27 means either. But on that day, 24 May, you were given close to
28 100 United States dollars to cover family assistance and
29 transport and we - just pause for a moment. We know that you

1 were interviewed by the investigators on 23, 24 and 28 May?

2 A. No, this was - I didn't say that all these things -
3 occasions were for interviews. I didn't say that. It was not
4 for interviews.

15:09:41 5 Q. Did you take your family with you when you went to see them
6 in late May last year, or is this simply money that they gave you
7 because you wanted it for your family?

8 A. No, that was not the case.

9 Q. No, you didn't take your family with you?

15:10:09 10 A. No.

11 Q. So they gave you this money in order for you to spend it on
12 your family?

13 A. They knew my conditions. They know that I had a family. I
14 have wives, I have kids. They knew my conditions, so they had
15:10:34 15 asked me about my conditions.

16 Q. Box 12, please. On Tuesday 12 June you were given another
17 100 United States dollars, no reason was given, but it was to
18 cover family assistance and your telephone calls?

19 A. Yes, it was assistance indeed. They have been helping me.

15:11:07 20 Q. Do you know if you gave them any information in June of
21 last year?

22 A. No, no, I don't remember. I don't remember having given
23 them any information on that date.

24 MR MUNYARD: Madam Court Officer, could you turn over the
15:11:28 25 page, please, and we will look at box 13:

26 Q. Two days later on 14 June last year you were given 100
27 United States dollars again also for family assistance?

28 A. These people, they usually - that's usually what they write
29 when they gave me the assistance, but I don't remember each and

1 every occasion. They have helped me, but I can't remember each
2 and every occasion.

3 Q. Box 14, please. Six days later on 20 June Mr Morris paid
4 you 7.88 United States dollars reimbursing you for the cost of a
15:12:32 5 meal or meals?

6 A. Yes, it's possible.

7 Q. And the assistance you had given them is recorded as a
8 number 205 and again, Mr Camara, I am not asking you to comment
9 on that. Now 7.88 United states dollars would buy an awful lot
15:13:00 10 of food in The Gambia, wouldn't it?

11 A. The part you have just read to me, if it's true - if it's
12 Haddad who has written this or Morris or John, it's true then.

13 Q. I am not suggesting it's not true. I just want to ask you
14 can you remember were you given this amount of money, \$7.88, or
15:13:42 15 was a meal bought for you that cost 7.88 US dollars?

16 A. \$7 would not be too - I mean a lot of meal, because at that
17 time already one dollars - one dollar would be - would amount to
18 18/19 Dalasi, so that was not a big amount. I use - what I spend
19 for my family daily is far more than that.

15:14:27 20 Q. If you had a meal with Mr Morris and/or with Mr Berry that
21 would mean that you had gone to see them, wouldn't it?

22 A. Yes.

23 Q. And when you went to see them to have a meal, you would
24 usually give them information, wouldn't you?

15:14:53 25 A. No.

26 Q. Usually. Not always, but usually you would give them
27 information, wouldn't you?

28 A. Sometimes, yes.

29 Q. Most of the time, yes?

1 A. No.

2 Q. Mr Camara, you weren't under the illusion that these men
3 were your personal social friends, were you?

4 A. Yeah, we knew each other and when you know somebody and you
15:15:43 5 come to have this type of meetings I will - I can say that I know
6 them.

7 Q. You do appreciate, don't you, that the reason that these
8 men were spending money on meals for you was because they wanted
9 to get information out of you?

15:16:14 10 A. No, no, because it's not on every occasion that they would
11 ask me for informations.

12 Q. I have accepted that, but most of the time they would ask
13 you for information, wouldn't they?

14 A. No. I said no.

15:16:34 15 Q. That was the sole purpose of their continuing to see you to
16 get more and more information out of you, wasn't it?

17 A. No, I said no.

18 Q. Five days later on 25 June Mr Morris gave you \$42.31 in US
19 currency?

15:17:11 20 A. Yes.

21 Q. To cover your transportation and family assistance?

22 A. Yes.

23 Q. So within the space of eleven days you had been given \$142
24 for family assistance and transportation and another nearly \$8

15:17:54 25 for a meal. Are you saying --

26 A. It's possible.

27 Q. Well, it's there. Are you saying that you didn't give them
28 any information at all over that period?

29 A. No.

1 Q. Let us just clarify what you mean by no. Are you saying
2 that you gave them no information during that period, or are you
3 saying that you might have given them information during that
4 period?

15:18:36 5 A. When I give them information they write it down. When I
6 give them information indeed they do write it down.

7 Q. Mr Camara, they don't. Would you go back, please, to box
8 9. We know that on 18 April 2007 you were interviewed and you
9 gave them information and you were given on that day 100 United
15:19:13 10 States dollars for your assistance in locating people and your
11 transportation and communication costs. They didn't write down
12 information then, did they?

13 A. Yes, it's written there.

14 Q. Yes, but where is the word "information" written in box 9?

15:19:44 15 A. No, not in those terms. I haven't seen that in those
16 terms.

17 Q. Box 16, please. On 30 July last year Mr Morris gave you
18 145.83 US dollars and the reason for that was investigations,
19 interviews and to cover the costs of your transportation and your
15:20:19 20 phone calls. Now we know that you were interviewed five days
21 before that on 25 July. So this money was clearly given to you
22 partly for the information you gave them, wasn't it, and partly
23 for your expenses?

24 A. Yes, that's what he wrote - he wrote down. That's why he
15:20:53 25 gave me the money.

26 Q. Box 17, please. September 26, 2007, this time somebody
27 else, a Mr Swart or Miss Swart for all I know gave you 200 United
28 States dollars for 100 dollars for security for October, in other
29 words the month that had not yet arrived, and 100 dollars for the

1 assistance that you rendered to them. What assistance did you
2 render to them on or before 26 September 2007?

3 A. I don't remember that meeting with Swart.

4 Q. That meeting with who?

15:21:57 5 A. With Swart. Who is Mr Swart? Can you tell me who is
6 Mr Swart?

7 Q. I was hoping you would tell us who Mr Swart is. Whoever
8 they are, they were being very generous to you in September last
9 year, weren't they, giving or authorising 200 United States

15:22:19 10 dollars to you. And do you know what the assistance was that you
11 had rendered to them to justify the giving of 100 dollars out of
12 that 200?

13 A. If you give me the name, because I don't remember the name.

14 Q. It may be that it was simply authorised by this person, I
15:22:53 15 don't know. All I am concerned about is do you agree that you
16 got 200 US dollars on 26 September for a combination of
17 assistance that you gave them and something to do with security
18 the following month, October?

19 A. Yes, yes, I do remember having received 200 US dollars.

15:23:27 20 Q. Thank you. Do you know what the security aspect of it
21 refers to? It says, "Security October". Can you help us at all
22 with what that means?

23 A. I don't actually know what it means. And then the
24 assistance also I really don't know. This is their way of
15:23:59 25 putting things.

26 Q. Yes, let me just ask you a little bit more about security.
27 Had you had to pay for any security for yourself, your family, or
28 your house?

29 A. When they give me assistance they write down "assistance".

1 Q. This was the largest single amount of money that you were
2 ever given, 200 dollars. Can you remember the occasion? It's
3 not that long ago. It is only late last September. Can you
4 remember getting \$200 in your hand, if that's how it was given to
15:24:57 5 you?

6 A. Maybe for you 200 is a lot of money, but for me it is not
7 because I have already had much more - I have already had much
8 more in my hands.

9 Q. That's very interesting, Mr Camara, but it doesn't go
15:25:24 10 anywhere near answering the question I asked you. What do you
11 recall of the circumstances in which you were paid \$200. Let me
12 withdraw that word. What were the circumstances in which you
13 were given \$200 on 26 September 2007?

14 A. They know why they gave me the money and they wrote it
15:26:08 15 down.

16 Q. Do you remember being given 200 US dollars in your hand
17 just a few months ago at the end of September last year?

18 A. I said that it's possible. I don't put - I didn't put
19 things on record. I told you - I told you that I don't remember
15:26:33 20 exactly. I didn't even know that somebody was going to ask me
21 questions about these questions.

22 Q. How often does somebody walk up to you and give you 200
23 United States dollars?

24 A. Before I came here I found people - I have some teachers
15:27:01 25 outside, they gave me amounts much more important than 200 US. I
26 always get money, you know, much more than this amount. So for
27 me that is not a big issue.

28 Q. Well, you are obviously in a very lucky position,
29 Mr Camara, but I want to go back, please, to these investigators.

1 Just let me finish the question. Somebody has recorded here that
2 on 26 September last year you were paid 200 US dollars. Can you
3 remember if that was put into your hand?

15:28:07 4 A. I am telling you that this is not a big issue. I have got
5 much more than 200. People, brothers have given me much more
6 than this.

7 PRESIDING JUDGE: Mr Witness, the question is can you
8 remember if that amount of money was put into your hand.

9 THE WITNESS: No, I don't remember. I don't remember.
15:28:32 10 It's possible, but I didn't put it on record. It's possible,
11 because they have given me assistance on many occasions. I
12 didn't say that it didn't happen. It's quite possible.

13 MR MUNYARD:

14 Q. Do you have a bank account, Mr Camara?

15:28:58 15 A. No.

16 Q. So are you able to help us with the security aspect of this
17 money. Did you yourself have to spend any money on your personal
18 security or that of your family, or your home, or homes, in
19 October of last year?

15:29:31 20 A. Unless you ask the person named Swart, you ask him that
21 question. What I know is what I have told you already. They
22 usually gave me assistance and they gave me a receipt to sign and
23 I signed, because normally they were supposed to report to their
24 supervisors when they gave me an amount of money.

15:30:02 25 Q. I am taking that as the answer no to my last question and I
26 am going to move you on to the box 18. The very next day
27 Mr Morris reimbursed you 43.18 United States dollars for
28 transport?

29 A. That's possible.

1 Q. Can you remember what you would have spent 43 United States
2 dollars on for transport?

3 A. I didn't put things on record. I didn't note those
4 informations. Really I don't remember on which occasion I was
15:30:59 5 given a specific amount of money. I don't remember all of the
6 different occasions. I know that they used to write it down, so
7 what they have written, it's true. It is not a lie.

8 Q. Boxes 19 and 20, please, the same page. Box 19 on 5
9 November and box 20 on 4 December you were paid 100 dollars on
15:31:41 10 each of those dates for something entitled "Security". Can we
11 assume that you don't know what that security refers to?

12 A. I can't tell you what it means. You should maybe ask those
13 people who gave me the money. I think they would be in a better
14 position to explain why they gave me that money, but I am not in
15:32:20 15 a position to explain.

16 Q. You took the money on these two occasions. Did you spend
17 it on your own security?

18 A. The amount they gave me, you mean?

19 Q. Yes.

15:32:45 20 A. They have given me the money and they wrote down the
21 reason, but the way I use the money they gave me, that was left
22 up to me.

23 Q. I don't want to be unfair to you. Were you actually given
24 100 United States dollars in your hand at the beginning of
15:33:07 25 November and again at the beginning of December?

26 A. When they came to The Gambia, I was the one who took them
27 to the hotel and they want to go to what is called a cultural
28 area - cultural area and so I had to go there with them. Maybe
29 that's why they have written "Security", because you know they

1 asked me to go with them, to accompany them. I am the one who
2 accompanied them. All that might be included in "Security".

3 MR MUNYARD: I'm sorry, I don't know if you have finished
4 the interpretation. Madam Interpreter, had you finished
15:34:14 5 interpreting?

6 THE INTERPRETER: Yes, I had.

7 MR MUNYARD:

8 Q. Are you telling us, Mr Camara, that you were paid in
9 September 100 United States dollars to provide security cover for
15:34:31 10 the Special Court investigators when they came in October?

11 A. I didn't say that, exactly that. I know that they gave me
12 that assistance as a kind of compensation to help - to help me.
13 I am not the one who wrote "security".

14 Q. Is this right: That you have no idea what security means
15:35:06 15 on these receipts?

16 A. No.

17 Q. And I think for the sake of clarification that means you
18 are agreeing with me that you have no idea what it means?

19 A. No, I don't know.

15:35:28 20 Q. If they are paying you this money as security offered by
21 you to them while they are going around cultural areas, what you
22 are really saying is that you were acting as their bodyguard
23 while they went touring as tourists. That's what you're
24 suggesting, isn't it?

15:36:00 25 A. They just asked me to go around, to go with them.

26 Q. As their friend, or as their bodyguard, or possibly as
27 both?

28 A. It is just because we know each other. That's how I
29 perceive it. You're the one saying that I was the bodyguard, but

1 for me it is just a matter of relations - personal relations.

2 Q. Thank you. So you have removed the idea that you're being
3 paid security money to show them round as tourists?

4 A. I didn't tell you that.

15:36:55 5 MR MUNYARD: Madam Court Officer, can we now turn, please,
6 to the final page and look at box 21 next, Mr Camara.

7 Q. Do you see that on the screen in front of you?

8 A. Yes, I see the page.

9 Q. On 7 January this year you were paid 100 United States
15:37:33 10 dollars as security for the month of January 2008 and under
11 "Category" it says "Property". Was your property given security
12 measures?

13 A. No, no, no, I don't remember that. No, no, that's not the
14 case.

15:38:09 15 Q. So, as far as --

16 A. My orchard was not fenced and so maybe it was an assistance
17 in that they gave me some kind of assistance for my orchard to
18 have it fenced. I remember talking to them about that.

19 Q. Are you saying that they gave you the money and you spent
15:38:45 20 it on fencing your orchard?

21 A. Yes, yes, yes, to - they wanted to help me to fence my
22 orchard, yes, so that I could protect my property. Yes, I
23 remember having told them that and so they gave me - they just
24 helped me for that.

15:39:24 25 Q. And quite by chance it happened to cost 100 US dollars to
26 put a fence round your orchard, did it?

27 A. Yes, that's why they helped me.

28 Q. And when did you pay this 100 dollars to fence your
29 orchard?

1 A. That's what's so. That's why they have written that,
2 because I remember having told them that.

3 Q. Have you fenced the orchard, Mr Camara, or haven't you?

4 A. I have started it before I came to The Hague.

15:40:16 5 Q. The reason given in box 21 is "Security for the month of
6 January 2008". It does not say "Security for the orchard"?

7 A. I'm telling you what I remember. What I do remember,
8 that's what I'm telling you. It is possible. They are the ones
9 who know why they wrote - they put that down, why they put

15:40:46 10 "Security for the month of January".

11 Q. On 4 December you were paid by coincidence another 100
12 United States dollars for security. What did you use that 100
13 dollars for?

14 A. Please don't deal with my personal problems. What my
15:41:22 15 family problems and my personal problems have nothing to do with
16 this issue.

17 Q. Mr Camara --

18 A. I'm an adult.

19 Q. The last thing I want to do is to pry into your personal
15:41:33 20 problems. What I do want from you though is truthful answers
21 about these large amount am of the money, \$100 at a time given,
22 you to you in November, December and January for security and I
23 want you to tell these judges why public money was given to you
24 under the heading of "Security" to this amount?

15:42:17 25 THE INTERPRETER: Can he repeat it, please?

26 JUDGE SEBUTINDE: Mr Witness, can you please repeat your
27 answer for the interpreter slowly.

28 THE WITNESS: If the money belongs to the public - to the
29 state, it is not the whole state which is helping the Special

1 Court. I am the one helping the Special Court. So in that case
2 any assistance I render in that framework - I mean, it is as a
3 compensation.

4 MR MUNYARD:

15:43:06 5 Q. Go back to 7 January, Monday 7 January 2008. Where were
6 you then?

7 A. I'm in the Gambia.

8 Q. You were in The Gambia. Do you remember did somebody hand
9 you 100 US dollars on that day?

15:43:45 10 A. Yes. I said yes. I told you yes.

11 Q. You actually have a memory of being given the \$100 at the
12 beginning of January?

13 A. Yes, I already answered.

14 Q. Who gave it to you? Who was it who handed you the money?

15:44:12 15 A. The name is written at the bottom.

16 Q. What is the name?

17 A. I don't know the person, but I know that he works for the
18 Special Court. He was introduced to me.

19 Q. The way it is printed on the page makes it difficult to
15:44:41 20 know which of the initial or initials, but what we have on the
21 page is "Approved by RDIACK". Assuming that is somebody called R
22 Diack, is that a name that you know?

23 A. No, I don't know the name. I really didn't, because was my
24 first time to see that person.

15:45:11 25 Q. Don't worry about the name. Where were you when you were
26 given this money?

27 A. I was in The Gambia on 7 January.

28 Q. I'm sorry, I should have been more specific. Were you at
29 your home or were you at some other place in The Gambia? I don't

1 need to know where either of them are?

2 A. I was in The Gambia. Where else would I be?

3 Q. Were you at your home or at some other place?

4 A. [Inaudible] telling me. These people have given me the
15:46:04 5 assistance, yes. They have given me an assistance. The person
6 who did this, I don't know that person. I just know that that
7 person works for the Special Court. I didn't ask for anything.
8 I told them that I wanted to fence my orchard, but the receipt
9 itself, I haven't seen the receipt.

15:46:45 10 Q. Did the person come to your property, your home, to give
11 you the money, or did you have to travel somewhere to get it from
12 them?

13 A. I went to receive the money.

14 Q. Did you incur travel expenses in going to receive the
15:47:12 15 money?

16 A. Yes.

17 Q. Were you reimbursed for your travel expenses?

18 A. No, it was a kind - it was an assistance I was receiving.

19 Q. Assistance in West Africa means financial support, doesn't
15:47:37 20 it?

21 A. Yes.

22 Q. Thank you. We can see here at the bottom of this - well,
23 below box 21 we can see the total that you are said to have
24 received according to these receipts and the total is 1,506.18
15:48:07 25 United States dollars. If you turn back - again Madam Court
26 Officer. If you turn back to the first page this total only
27 relates to money you were given on or after 27 February 2007 and
28 so we have to add to the total \$100 for your interview in October
29 2006 and \$100 for your interview in November 2006, don't we?

1 A. Yes, I wouldn't know the total.

2 Q. We have to add in those two figures, don't we, because they
3 are not shown in this document which only starts in February of
4 2007?

15:49:22 5 A. Which days?

6 Q. October and November 2006 when you were interviewed and
7 gave information to the investigators and you told us that you
8 were paid for doing that?

9 A. I didn't tell you that I was paid for giving information.
15:49:43 10 I didn't tell you that. And I told you - I asked you to stop
11 saying that I was paid.

12 Q. I'm using an apparently emotive term again and let me
13 change it. You were given \$100 each time for those two earlier
14 interviews for which we do not have financial records. That is

15:50:09 15 correct, isn't it?

16 A. If it is not written down, that means that they didn't give
17 it to me. If it is written down there in the statement then it
18 is true. Whatever amount they gave me they wrote it down.

19 Q. Mr Camara, you will not know this, but the entry in box 4,
15:50:34 20 \$100 on Tuesday 27 February 2007 was not disclosed to us. Box 4
21 was empty until we got a revised version of this document just a
22 matter of a few days ago. So the fact that there is nothing in a
23 box doesn't mean that you were not paid - sorry, doesn't mean
24 that you were not given money. Now you told this Court earlier,
15:51:03 25 did you not, that when you were interviewed in 2006 you were
26 given money for the assistance you provided to the investigators?

27 A. Everything, if they haven't written it down, I haven't got
28 the money. Whatever I got from them they wrote it down.
29 Whenever they gave me money they wrote it down. I don't remember

1 having received money from them without them writing it down.

2 That's what I remember.

3 Q. If I had been asking you these questions three weeks ago I
4 wouldn't have had anything in box 4 to ask you about and so it

15:51:57 5 doesn't follow, does it, that an empty box means that you weren't
6 paid?

7 A. I told you that whatever I received they wrote it. It was
8 written down and I remember that whenever I got money they asked
9 me to sign a receipt.

15:52:21 10 Q. How long have you now been in Holland, the Netherlands?

11 A. I came here on last month I think in January, around 17
12 January. If my memory serves me right it must be around 16/17
13 January that I arrived in The Hague.

14 Q. And have you finally been to the Amsterdam?

15:53:01 15 PRESIDING JUDGE: What is the relevance of this question,
16 Mr Munyard?

17 MR MUNYARD:

18 Q. You told the Court this morning that when you left The
19 Gambia in 1986 your intention was to go to Amsterdam?

15:53:21 20 A. I didn't tell you that. I didn't come. This is my first
21 time to come to the Netherlands.

22 JUDGE SEBUTINDE: Mr Munyard, I do recall the witness using
23 or referring to the word Amsterdam as an example, that if you are
24 travelling from somewhere to Amsterdam, maybe from The Hague to
15:53:44 25 Amsterdam, this is what you would do, so and so, but he didn't
26 literally mean that he went to Amsterdam.

27 MR MUNYARD: Your Honour --

28 JUDGE SEBUTINDE: That's what I recall.

29 MR MUNYARD: Before I reply I think the witness wants to

1 say something to you.

2 THE WITNESS: Yes, I remember. It's the judge who is
3 reminding me now what I said. You had put a question to me. You
4 asked me whether I left Gambia to improve my financial situation.

15:54:17 5 I said that I didn't leave with the intention of going to fight -
6 to join the SOFA and I gave you an example. I said for example
7 you can take a car in The Hague to go to Amsterdam. You might
8 have an accident on your way even if it was not your intention at
9 the beginning. That is how Amsterdam came in my statement. Now
15:54:51 10 I remember. I never told you that I wanted to go to Amsterdam.

11 MR MUNYARD:

12 Q. Let's go back to the money, please. Have you spent the
13 1,700 odd dollars that you received?

14 A. Yes, indeed.

15:55:17 15 Q. Have you received any money since Monday 7 January?

16 A. No, I haven't received anything yet.

17 Q. You haven't received anything yet, but does that mean
18 you're expecting to receive more money for having given further
19 assistance to the Prosecution in this case, Mr Camara?

15:56:02 20 A. Since they went as the first - at the beginning they told
21 me that all this matter was on a voluntary basis, so if I receive
22 money from them it will be a kind of surprise.

23 Q. But are you expecting that pleasant surprise once you have
24 finished giving your evidence?

15:56:46 25 A. No, not at all. I am not expecting anything.

26 Q. Is that an honest answer, Mr Camara?

27 A. Yeah, that's quite true.

28 MR MUNYARD: Madam President, I have no further questions.

29 Thank you.

1 PRESIDING JUDGE: Thank you, Mr Munyard. Any
2 re-examination, Mr Werner?

3 MS HOLLIS: Madam President, excuse me for rising instead
4 of my colleague, but there is something that we need to put on
15:57:28 5 the record relating to the disclosures about reimbursements for
6 this witness, because when the matter came up in
7 cross-examination I sent an email to Freetown asking them if
8 payments had been missed and I received a response and the reason
9 that I am giving this to you is that, as a senior trial attorney,
15:58:02 10 this is my responsibility. So I wanted to let you know.

11 And here is the information that I received: On 7 October
12 2006 there was a disbursement made to this witness of \$14.81.
13 The reason was given as transport and communication and meal.
14 The category was transport. I apologise for not having printed
15:58:44 15 this out, but we have no print capability of our own. On 13
16 October 20 --

17 MS MUZIGO-MORRISON: Excuse me, your Honour, if Ms Hollis
18 forwards the email to me I can print it out for the Court.

19 MS HOLLIS: Okay, maybe I will forward it and as you're
15:59:05 20 printing it I will be providing the information.

21 MS MUZIGO: Thank you.

22 MS HOLLIS: Let me provide the information and then I will
23 forward it for you. On 13 October 2006 this witness was provided
24 the amount 22.22 United States dollars. The reason given was
15:59:26 25 transport and communication, the category was transport.

26 On 3 November 2006 the witness was provided \$18.51. The
27 reason given was reimbursement for meal, transport and
28 communication and it was listed as transport/lost wages.

29 On 10 November 2006 the witness was given the amount of 100

1 US dollars. The reason given was potential witness location, the
2 category was information.

3 On 9 February 2007 the witness was given \$23.07, that is US
4 dollars. The reason given was transport and communication. The
16:00:37 5 category was transport.

6 On 10 February 2007 the witness was provided 100 US
7 dollars. The reason given was cost for transportation and
8 communication in locating potential witnesses. The category was
9 information.

16:01:09 10 On 19 February 2007 the witness was given 100 US dollars.
11 The reason given was locating of potential witnesses. The
12 category was information.

13 The next entry is 27 February 2000 entry that Defence
14 counsel has spoken of and in that regard the updated disbursement
16:01:45 15 record that Defence was given did include the 27 February 2007.
16 It was at the top of the next page. The amount that was
17 corrected was the total amount.

18 Now I have enquired, because obviously this is an issue of
19 concern - I have enquired as to why these payments were not made.
16:02:07 20 It has been indicated to me that it was some issue relating to
21 entries in the computer, but I have requested that a double and
22 triple check be made of disbursements to all upcoming witnesses
23 and for all witnesses who have already testified and should there
24 be changes in that information for upcoming witnesses we will of
16:02:34 25 course provide it to the Defence. If there are changes in
26 information for witnesses who have already testified, that
27 information will be provided to the Court and to the Defence.

28 PRESIDING JUDGE: Thank you for that information, Ms
29 Hollis.

1 MR MUNYARD: Madam President, can I just say this: My
2 learned friend might be quite right in saying that the 27
3 February amount was disclosed to us. The fact is if it was then
4 it was in box 5 and box 4 was empty. I have actually got both of
16:03:14 5 the pages with me. I am not taking a point on it. I just want
6 the Court to understand that until very recently boxes 1 to 4
7 were blank.

8 Can I also say that in the light of what Ms Hollis has just
9 told us then obviously the total that appears below box 21 is
16:03:33 10 boosted by more than \$300, not just by \$200.

11 MS HOLLIS: And if I may, your Honour, what I have been
12 sent does reflect the new total and the new total is reflected as
13 \$1,984.79 and that is US dollars.

14 PRESIDING JUDGE: Mr Munyard, that has now been disclosed
16:04:15 15 to you. As Ms Hollis correctly says, that's a duty of the
16 Prosecution. This information was not before you when you were
17 cross-examining. Have you any application to make?

18 MR MUNYARD: I am grateful for the opportunity, but I don't
19 propose to labour these points any further than I have done.

16:04:34 20 PRESIDING JUDGE: Thank you for that indication. In the
21 light of that please proceed with your re-examination, if any,
22 Mr Werner.

23 MR WERNER: Thank you, Madam President, your Honours.

24 RE-EXAMINATION BY MR WERNER:

16:04:46 25 Q. Good afternoon, Mr Witness.

26 A. Good afternoon.

27 Q. Mr Witness, today my learned friend the Defence counsel
28 directed your attention to the statement behind tab 3 and in
29 particular he spent some time with you on one page which is

1 00026950 and the statement is 9 and 10 February 2007. Now he
2 directed your attention to the third paragraph. Do you see this
3 paragraph? He asked you questions about the first sentence which
4 reads as follows:

16:06:09 5 "He advises that Sam Bockarie arrived in Liberia before he
6 returned to Liberia in January/February of 2003 from the Gambia".

7 Do you remember when that happened this morning?

8 A. Yes, I do remember.

9 Q. I would like to direct your attention to another statement
16:06:34 10 which is behind tab 5, starting at page 00038044 and the part I
11 am interested in is the second page, 00038045, and that is a
12 statement taken on 23, 24 and 28 May 2007 and the first item on
13 that page 00038045 reads as follows - let me preface by saying
14 that on that statement a chronology was taken from you and on
16:07:36 15 that page 38045 you can see the first item talks about the year
16 2002 and it is written, "The witness returned to Liberia in
17 October". Do you see that?

18 A. Yes, I see it.

19 Q. Is that correct?

16:07:57 20 A. Yes, it is correct.

21 Q. Thank you. Now this morning my learned friend asked you
22 questions about the time when you were on your last TDY at the
23 EMG ground in Gbarnga after the recapture of Gbarnga. Do you
24 remember when he asked you about that?

16:08:33 25 A. Yes, I remember.

26 Q. And you said this morning that at that time you listened to
27 ULIMO communication at the EMG in the Mandinka language. Do you
28 remember when you said that?

29 A. Yes, I do.

1 Q. Could you explain to this Court why you listened to
2 communication about ULIMO in Mandinka language at the EMG at that
3 time?

4 A. At that time ULIMO when they wanted to communicate and
16:09:22 5 mislead our people they used to do it in Mandinka language and
6 that's why I was asked to listen and interpret to the others.

7 Q. And who, if anyone, asked you to do that?

8 A. It was mostly the communicator - the man who was in charge
9 of communication. He is the one who made the request.

16:09:54 10 Q. Do you know who, if anyone, asked him to request you to do
11 that?

12 A. It was for sometimes - on some occasions it was through
13 Jackson. Jackson said that I should go there and interpret the
14 communication for them. Sometimes it is the man himself in
16:10:25 15 charge of communication who would ask me for help.

16 Q. And when you say Jackson, did you talk about General
17 Jackson?

18 A. Yes, I mean General Jackson. Jackson. General Jackson,
19 indeed.

16:10:40 20 Q. Thank you, Mr Witness. Now yesterday my learned friend the
21 Defence counsel asked you about the first time you went to Lofa
22 County with Mustapha Jallow. Do you remember that?

23 A. Yes, I do remember.

24 Q. And I will read you just a short portion of the transcript
16:11:06 25 of yesterday's proceedings. So the question was, "This was your
26 first TDY?" You answered, "First TDY when I entered Liberia."
27 Then the question was, "Yes. What Mustapha Jallow was doing in
28 those days was providing security for the worker at the logging
29 company. That is right, isn't it?" You answered, "Yes, that's

1 right"?

2 A. Yes, yes, indeed.

3 Q. Then the question was put to you, "It is right that you
4 went back for a second TDY later on in 1992 for about two

16:11:49 5 months?" And then there is some word we cannot see and then it
6 says, "Join Mustapha Jallow at the logging company" and then you
7 answered, "Yes, indeed. I went there for a second TDY" and then
8 the question was, "And again all Mustapha Jallow was doing during
9 1992 was providing security for the loggers" and you say, "Yes,
16:12:12 10 correct". Can you remember that?

11 A. Yes, I do remember.

12 Q. Now, Mr Witness, during your first and your second TDY in
13 Lofa County in 1992, if you know, how many people were providing
14 security to the logging companies?

16:12:36 15 A. A great number of - a great number of people were there
16 with Mustapha.

17 Q. And if you know, to what group did these people belong?

18 A. They belonged to - they were soldier of NPLF.

19 Q. NPLF?

16:13:00 20 A. NPFL.

21 Q. Thank you. Now, Mr Witness, yesterday my learned friend
22 the Defence counsel directed your attention to the statement
23 behind tab 1, dated 7 October 2006, starting at page 00023626 and
24 I want to take you to the second page of that statement,

16:13:45 25 00023627. Now yesterday my learned friend read to you the first
26 two points in that page that talk about Mahtaba and Libya and
27 then he mentioned to you the rest of that half page and the
28 training that you had in Libya in relation to the Small Boys
29 Unit, but he did not read the last two points on that page where

1 you talk about the Small Boys Unit and I would like to read to
2 you the seventh point, if you can count the seventh point on that
3 page which starts, "A part of the training dealt with the use of
4 Small Boys Units".

16:14:34 5 MR MUNYARD: Madam President, I will be corrected if I am
6 wrong, but I thought that I did deal with, "Part of the training
7 dealt with the use of the Small Boys Units". I agree I didn't go
8 on to read the rest of it, by I am pretty certain that I went
9 from, "We were taught how to ambush, attack and retreat" to, "The
16:14:53 10 trainers were all Libyan" to, "Part of the training dealt with
11 the use of Small Boys Units". As I say, if I'm wrong I am quite
12 happy to be corrected, but I thought that I had done that.

13 MR WERNER: Yes, and I have copies and I have the
14 transcripts with me. You are quite right. You read the first
16:15:12 15 line, which is, "Part of the training dealt with the use of the
16 Small Boys Unit". That's what was read and I am happy to refer
17 to the transcript if there is any controversy about that:

18 Q. So I would like simply to read the four lines following
19 that which reads as follows:

16:15:33 20 "It was part of the ideology that they were given, it was
21 explained to them that the Small Boys' thinking is only one-sided
22 and that they are easy to control. They have no fear and they do
23 not know responsibility. You can have them do something and make
24 them feel superior very easy. They are very easy to motivate."

16:16:06 25 Do you remember saying that?

26 A. Yes, I did say that.

27 Q. Is that right? Is that true?

28 A. Yes, it is true.

29 Q. Thank you. Now in the same statement, page 00023628, so it

1 is just the next page, and yesterday my learned friend asked you
2 questions about Libya and Burkina Faso and what you did in Libya
3 and what you did in Burkina Faso and today and yesterday he read
4 you some portions of that page and I would like to go to the
16:16:59 5 ninth point starting from the top, the ninth point which reads,
6 "Taylor was the leader". Do you see that?

7 A. Yes, yes, I see it.

8 Q. And my learned friend read you the first three lines and
9 then he read you part of the fourth line and he stopped at, "For
16:17:23 10 Sankoh to launch his attack into Sierra Leone". Would like
11 simply to complete and read you the last sentence which reads as
12 follows: "This gave a gateway to come into Sierra Leone. This
13 could have been 1989/ 1990." Did you say that?

14 A. Yes.

16:17:52 15 Q. Is that correct?

16 A. Yes, it is correct.

17 Q. Thank you. Now I would like to refer you to the statement
18 behind tab 2, page 00025322, and yesterday my - do you have that
19 page, Mr Witness?

16:18:34 20 A. Yes, I have the page.

21 Q. And if you remember my learned friend spent some time with
22 you on the third paragraph starting, "Camara advises". Do you
23 see that paragraph?

24 A. Yes, I do.

16:18:51 25 Q. So I would like to read you again the whole paragraph which
26 reads as follows:

27 "Camara advises that he knew Taylor was the boss just by
28 watching the leaders as they came around to talk to us. It was
29 Taylor who would dash them (give them small money) and who was

1 supporting us even then. When we had a problem and would go and
2 see Dr Manneh he would say let me go and see Charles Taylor and
3 see if he has some money to help us. Because of this I know that
4 he's a bigger man than our leader. It was because of this that I
16:19:36 5 believe he was" and it reads ale which I think is a typo for able
6 "to convince our leader to go with him to this place Liberia."

7 Now my learned friend asked you one question yesterday and
8 he asked you - it is page 66 of the transcript of yesterday, he
9 asked you, "The next paragraph, the one I have been asking you
16:20:04 10 about, doesn't say it was in Burkina Faso, does it?" You
11 answered, "In this paragraph it is about normally Burkina Faso".
12 Do you remember saying that?

13 A. Yes, I do remember.

14 Q. Is that correct? Is it about Burkina Faso, according to
16:20:22 15 you?

16 A. Yes, it is.

17 Q. I would like to put some context around this paragraph and
18 take you back to page 00025321 and look at the last paragraph,
19 the one starting, "When he arrived in Libya" and start four lines
16:20:48 20 down where it is written, "There were a few Gambian". Do you see
21 that?

22 A. You can bring it down a bit? Yes.

23 Q. I am going to read that few lines to you:

24 "There were a few Gambians such as Mustapha Jalloh, Musa
16:21:26 25 N'jie, Jack the Rebel and others who also travelled to Burkina
26 Faso at this time. He advises that each group like Taylor and
27 his NPFL, Gambians in the SOFA movement and Sankoh and his men
28 left on their own cargo planes to go to Burkina Faso and that the
29 transfer took place over a period of time."

1 Then over the next page, 25322:

2 "Each group would travel in their own group. That he and
3 the second group of Gambians left for Burkina Faso in late 1990".

4 So here in this paragraph talks about Burkina Faso,

16:22:15 5 Mr Witness, is that correct?

6 A. Yes, it is. It is correct.

7 Q. And then if you look at the next paragraph, the one
8 immediately following started by, "Camara advises", it reads:

9 "Camara advises that the Sierra Leoneans that he met in the
16:22:34 10 training camps in Libya told them they were from Sierra Leone.
11 They were together for long periods of time and would talk to
12 each other. We can tell that people are from the other areas
13 also just by listening to them talk. Africans can usually tell
14 by talking to someone where they may be from."

16:22:58 15 So, Mr Witness, this next paragraph talked about Libya, is
16 that correct?

17 A. Yes, indeed it talks about Libya.

18 Q. Thank you, Mr Witness. Now I would like to take you to the
19 statement behind tab 5.

16:23:21 20 MR MUNYARD: These are not statements. They are somebody
21 else's interview notes.

22 PRESIDING JUDGE: That is strictly correct, Mr Werner.

23 MR WERNER: Thank you. I accept that:

24 Q. So behind tab 5. Now the page starts 00038044. It is the
16:23:45 25 statement 23, 24, 28 May 2008 and I would like in this statement
26 to take you to the page 00038051. Now if you go three paragraphs
27 down and then in that paragraph, the third line, the sentence
28 which starts with, "The witness learnt". Do you see that?

29 A. Yes, I do.

1 Q. So it reads:

2 "The witness learnt of the invasion into Sierra Leone in
3 this meeting as Ibrahim Bah and Landing Jammeh had just arrived
4 from Sierra Leone where they had fought alongside the RUF."

16:24:49 5 Do you see that?

6 A. Yes, I see it.

7 Q. Mr Witness, was Landing Jammeh known by any other name?

8 A. Lamin Camparre.

9 MR WERNER: Your Honours, I have noticed that in
16:25:10 10 yesterday's transcript Landing Jammeh was not correctly spelt and
11 so I propose to spell both names. Landing Jammeh would be
12 L-A-N-D-I-N-G and Jammeh J-A-M-M-E-H and I believe that the name
13 the witness just gave is Lamin Camparre which will be L-A-M-I-N
14 C-A-M-P-A-R-R-E:

16:25:48 15 Q. Now finally my learned friend yesterday referred you to
16 another at portion of the statement behind tab 5 - sorry, another
17 part of the document behind tab 5 and in particular at page
18 00038047. So the paragraph I am interested in is the third
19 paragraph started by, "Dr Manneh met them the next day". Can you
16:26:40 20 see that?

21 A. Yes, yes.

22 MR WERNER: And I hope I can finish. I hope I can finish.

23 PRESIDING JUDGE: We have just been informed it's 3.5
24 minutes, so it would be very neat if we could do that.

16:26:57 25 MR WERNER: I will do my best.

26 PRESIDING JUDGE: I'm not inviting you to cut your
27 re-examination short.

28 MR WERNER:

29 Q. Yesterday my learned friend asked you some questions about

1 that paragraph, the third paragraph at that page, and here is
2 what he asked you:

3 "Q. Right in the middle of the page?

4 A. Yes, okay, yes, I see the paragraph.

16:27:25 5 Q. Thank you. It is describing what happened after you
6 arrived in Burkina Faso with your 16 Gambian colleagues,
7 isn't it?

8 A. Yes, exactly.

9 Q. Dr Manneh met you. In other words he had a meeting
16:27:39 10 with you, yes?

11 A. Yes, that is true.

12 Q. And in that meeting he told you that the other Gambians
13 from the first group had already left Burkina Faso. Do you
14 agree?

16:27:50 15 A. Yes.

16 Q. He told you that the Gambians in the SOFA movement were
17 not ready yet to overthrow the government. Do you agree
18 that that's what he said?

19 A. No, no, no, it is not exactly that."

16:28:06 20 Now my learned friend missed out some words in this
21 paragraph, the third paragraph page 38047, and I would like
22 simply to read the complete sentence and I will ask you if you
23 said that and the complete sentence reads:

24 "Do Manneh explained to them that the other Gambians from
16:28:28 25 the first group had already left Burkina Faso for Liberia to
26 assist Charles Taylor".

27 Do you remember saying that?

28 A. Yes.

29 Q. And is that true?

1 A. Yes, it is true.

2 MR WERNER: That concludes my re-examination, your Honours.

3 PRESIDING JUDGE: Thank you, Mr Werner. That's very neat.

4 Thank you, Mr Witness. That completes your evidence before the

16:29:03 5 Court. We are grateful for your assistance. You are now at

6 liberty to leave the Court as soon as we rise. Thank you. We

7 will now adjourn until tomorrow morning at 9.30.

8 [Whereupon the hearing adjourned at 4.30 p.m.

9 to be reconvened on Thursday, 14 February 2008

16:29:41 10 at 9.30 a.m.]

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