



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 14 JANUARY 2008
9.00 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr William Romans
Ms Doreen Kiggundu

For the Registry:

Ms Rosette Muzigo-Morrison
Ms Rachel Irura
Mr Vincent Tishakwa

For the Prosecution:

Ms Brenda J Hollis
Mr Christopher Santora
Mr Alain Werner
Ms Maja Dimitrova

**For the accused Charles Ghankay
Taylor:**

Mr Courtenay Griffiths QC
Mr Terry Munday
Mr Morris Anyah

1 Monday, 14 January 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.00 a.m.]

09:00:16 5 PRESIDING JUDGE: Good morning. I notice that the Defence
6 counsel are not here. Madam Court Manager, what is going on?

7 MS MUZIGO-MORRISON: Good morning, your Honour. A member
8 of the Defence team was here 15 minutes ago to report that they
9 have been locked out of their office and so they are unable to
09:00:46 10 robe, or pick up their files. We contacted the ICC security
11 office and it is our belief that they are working on sending
12 someone to open the door for them and hopefully they should be
13 here soon. Most obliged to you, your Honour.

14 PRESIDING JUDGE: Is there anybody here from security to
09:01:23 15 explain to us what is going on? Why is the office of the Defence
16 counsel locked? Why are they locked out of their office? Do we
17 have anybody to explain to us why, or how long this is likely to
18 take? I don't expect Madam Prosecutor to have a clue.

19 MS MUZIGO-MORRISON: Your Honour, the Defence team has got
09:01:51 20 one key which is shared amongst them, amongst the entire Defence
21 team, and this key was left at the Binckhorstlaan office, but in
22 the event when the key is missing, normally the practice is to
23 resort to the security control.

24 PRESIDING JUDGE: So then it is not entirely the fault of
09:02:19 25 the security office, but rather I might say the unfortunate
26 forgetfulness of the Defence office because they have their own
27 key. It is not as if they are locked out.

28 MS MUZIGO-MORRISON: That is affirmative, your Honour.

29 PRESIDING JUDGE: [Overlapping speakers] to leave their key

1 at Binckhorstlaan. That is different from alleging that the
2 security officer locked them out, isn't it?

3 MS MUZIGO-MORRISON: That is correct, your Honour.

4 PRESIDING JUDGE: Thank you. I am afraid we will just have
09:03:52 5 to sit here and wait because there is no way we can proceed in
6 the absence of Defence counsel, which is unfortunate.

7 We did decide that we would review the sitting hours, today
8 I think it was we said we would review, and again this is highly
9 dependent on the presence of Defence counsel. It was their
09:04:38 10 application to review the sitting times, an application that was
11 not opposed by the Prosecutor. We do have a feedback now from
12 Court Management which I will let you know as soon as Defence
13 counsel comes in.

14 Madam Court Manager, could you in any way check and see if
09:06:32 15 we had perhaps better adjourn, or whether it is worth sitting
16 here waiting?

17 MS IRURA: I will do so, your Honour.

18 Your Honour, we are informed that a security officer has
19 gone to open the office with a master key so they should be here
09:08:16 20 in about 5 to 10 minutes.

21 PRESIDING JUDGE: Then I think in that case we will adjourn
22 and if you could let the judges know when court is ready to sit.

23 MS IRURA: Much obliged, your Honour.

24 [Break taken at 9.10 a.m.]

09:12:06 25 [Upon resuming at 9.14 am]

26 PRESIDING JUDGE: Good morning, once again. Mr Griffiths,
27 we would like to hear from you, it is now 9.15, what your
28 misfortune was this morning.

29 MR GRIFFITHS: Your Honours may not appreciate this, but we

1 have been experiencing certain difficulties in terms of security
2 within this building. At present we have one key to the room
3 which all of us are sharing. Now, on Friday myself and
4 Mr Munyard were rushing off to return to London, for good reason,
09:14:06 5 and left the key with another member of the team. Unfortunately,
6 the key was left in the office and we were coming straight from
7 the hotel, which is adjacent to here, unaware that the key would
8 not be here at court and that is the difficulty, so we had to
9 wait for it to be brought from the office in Binckhorstlaan.

09:14:29 10 PRESIDING JUDGE: Anyway, for the record I think it is only
11 right - because we were given the impression that security had
12 locked you out of your office --

13 MR GRIFFITHS: No.

14 PRESIDING JUDGE: -- which is not true. What is closer to
09:14:40 15 the truth is what you are now saying: That you actually locked
16 yourselves out of your own room. Anyway, not that I have heard
17 an apology, but I would imagine that an apology is in order and
18 we will accept the unfortunate beginning, the loss of 15 minutes.

19 MR GRIFFITHS: We of course apologise, your Honour. It
09:15:05 20 would be helpful if we could be provided with a couple more keys.
21 It would solve this particular difficulty.

22 PRESIDING JUDGE: Mr Griffiths, I am sure you could take
23 that up with the ICC administration. I am sure they would be
24 happy to work that out.

09:15:25 25 Before we begin though I would like to revisit the issue of
26 the sitting hours that Defence counsel requested. We have now
27 cleared this with the ICC administration and our Court Management
28 and the new sitting hours, at least for now, are going to be as
29 follows: The first sitting will be from 9.30 to 11.00, and this

1 is beginning tomorrow. Beginning tomorrow we shall be sitting
2 from 9.30 until 11.00. We will have a break, a half hour break,
3 from 11.00 to 11.30. We will have the second sitting from 11.30
4 to 1.30 and our usual lunch break will be cut short by an hour,
09:16:10 5 that is from 1.30 to 2.30. That is the lunch break. Then the
6 afternoon sitting will be from 2.30 to 4.30, of course with the
7 exception of Friday. Friday, with the exception of the next two
8 Fridays where we hope to sit to make up time, will be free for in
9 house work.

09:16:37 10 We are going to continue with the testimony of witness
11 TF1-406. Good morning, Mr Witness.

12 THE WITNESS: Morning, Madam.

13 PRESIDING JUDGE: I wish to remind you, before we continue
14 with your cross-examination, that you are still under oath. Do
09:16:55 15 you understand that?

16 THE WITNESS: Yes.

17 WITNESS: TF1-406 [On former oath]

18 PRESIDING JUDGE: Mr Griffiths, please continue with your
19 cross-examination.

09:17:09 20 MR GRIFFITHS: Could I have a moment to reorganise my
21 files?

22 PRESIDING JUDGE: Do remember to switch on your microphone,
23 please.

24 THE WITNESS: It is on.

09:17:21 25 CROSS-EXAMINATION BY MR GRIFFITHS: [Continued].

26 Q. Last Friday when we adjourned, Mr Sheriff, I was asking you
27 about one particular aspect of your testimony which was to the
28 effect that you had seen Sam Bockarie in possession of a jar, a
29 mayonnaise jar, of diamonds. Do you recall that?

1 A. Yes.

2 Q. Do you recall that I directed your attention to a number of
3 passages in that first interview conducted with you when you were
4 asked about diamonds?

09:18:29 5 A. Yes.

6 Q. Do you remember that the very last passage to which
7 I referred your attention was at page 74 in that interview? Can
8 we go to page 74, please. Do you see, commencing at line 8, this
9 question, "I know that you were not involved in the diamond

09:19:24 10 transactions. I know that you didn't see that personally"? And
11 you say, "I didn't see." Page 74, your Honours. When you say
12 "I didn't see", what did you mean?

13 A. I meant I didn't see him doing diamond transactions. That
14 was what I meant.

09:20:01 15 Q. It is right, isn't it, that you have never seen a diamond
16 transaction involving President Taylor?

17 A. Yes, of course.

18 Q. Can we now, please, turn to page 78?

19 PRESIDING JUDGE: Mr Griffiths, is that "Yes, I have seen
09:20:32 20 him", or "No, I have never seen him"?

21 MR GRIFFITHS: I understood him as accepting the
22 proposition, but I will ask him again.

23 Q. Are you saying that you have never seen any diamond
24 transaction involving President Taylor?

09:20:48 25 A. I did not see him particularly.

26 Q. Can we turn now, please, to page 78. Again you will see on
27 that page at the top you are being asked about diamonds and in
28 particular the name Eddie Kanneh is put to you. Do you see that?

29 A. Yes.

1 Q. Eddie Kanneh, you told my learned friend when she was
2 asking you questions, is a diamond dealer, is he not?

3 A. Yes.

4 Q. And he has some connection with your ex-wife, doesn't he?

09:21:55 5 A. That is true.

6 Q. What is the connection?

7 A. They all hail from the same township, the second capital
8 city of Sierra Leone: Bo.

9 Q. What was the nature of Mr Kanneh's involvement in the
09:22:21 10 diamond business?

11 A. Mr Kanneh introduced himself to me that he was in charge of
12 the diamond transaction between the RUF and the NPFL government.
13 According to him he was also the business manager for the RUF
14 diamonds and that whenever RUF had diamonds he - they would be
09:22:51 15 handed over to him and then he would travel with them out of the
16 RUF territory to other places.

17 Q. So you understood that to be his responsibility and not the
18 responsibility of Sam Bockarie?

19 A. Sam Bockarie gave the position to Eddie Kanneh. Eddie
09:23:37 20 Kanneh was working under Sam Bockarie. Let me make that clear.

21 Q. His responsibility was diamond dealing, is that right,
22 Eddie Kanneh?

23 A. He was always given the diamonds with instructions whether
24 to go and sell them, or to whom to carry it - I never knew, but
09:24:09 25 then he introduced himself and told me that that was the position
26 he had in the RUF and the position was given to him by Sam
27 Bockarie and that he has been placed in charge of diamonds.

28 Q. Now, that is the last reference I want to bring to your
29 attention regarding diamonds in this first interview conducted

1 with you on 23 February 2005. Having gone through those
2 references, do you accept that nowhere in that interview did you
3 mention seeing Sam Bockarie in possession of a jar of diamonds at
4 Voinjama? Do you accept that?

09:25:02 5 A. I told you that I had several interviews. I can't tell
6 whether it is the one that you are referring to, but I know that
7 one - in one of my interviews I said it that I saw diamonds with
8 Sam Bockarie, with my eyes.

9 Q. I know you eventually did, Mr Sherif, I am asking you about
09:25:24 10 this first interview with investigators from the OTP. Do you
11 accept that in this interview at no stage do you mention that?

12 A. The diamond business that you are referring to, in my first
13 interviews we did not reach that area, that area you are talking
14 about. We did not get to the diamond discussion during my first
09:25:55 15 interview.

16 Q. That is totally incorrect, Mr Sherif. You were asked on no
17 less than seven occasions about diamonds during the course of
18 this 88 page interview and what I am suggesting, and I will be
19 corrected if I am wrong, is at no stage during that lengthy
09:26:17 20 interview did you mention seeing a mayonnaise jar full of
21 diamonds in the possession of Sam Bockarie. Do you accept that,
22 yes or no?

23 A. I don't know what you are referring to, or about the
24 particular interview. I never had one specific interview with
09:26:46 25 these people and I cannot say that I had all the interviews in a
26 day. It did not happen in a day.

27 Q. I appreciate that, Mr Sherif. Could you please listen
28 carefully to my question. I know that you had several interviews
29 with the Prosecution investigators. I am only asking you about

1 this first lengthy interview. Do you accept that throughout that
2 interview at no stage did you mention seeing a mayonnaise size
3 jar of diamonds in Sam Bockarie's possession? Do you accept
4 that, yes or no?

09:27:32 5 A. Yes.

6 Q. Do you further accept that nowhere in this interview do you
7 speak of Sam Bockarie executing five Kamajors in Koilahun? Do
8 you accept that, yes or no?

9 A. I explained that.

09:27:56 10 Q. Do you accept that you do not mention it in this first
11 interview?

12 A. I made mention of it in the first interview.

13 Q. Well, I will be corrected if I am wrong, but at no stage in
14 that first interview did you do that and we will come in time to
09:28:19 15 when you did, but what I am suggesting is at no stage in this
16 first interview did you do that. The reason why I suggest that
17 you didn't mention either of those two significant incidents is
18 because you never went to fetch Sam Bockarie at the request of
19 President Taylor. Do you understand me?

09:28:45 20 A. That is not true.

21 Q. I suggest it is a total fabrication on your behalf.

22 A. I did not fabricate no information here. I have nothing
23 against - to lie on Mr Taylor. I have nothing personal. What
24 I explain here is the truth that I am explaining.

09:29:15 25 Q. I want to ask you about another topic now, moving on. You
26 told us that on that trip, when you arrived in Voinjama you met a
27 senior intelligence officer who had travelled by helicopter from
28 Monrovia, is that right?

29 A. I did not say so. I said when I arrived in Voinjama the

1 assistant director for intelligence, Robert Bier, had flown
2 through the helicopter and landed in Tenebu. He took the vehicle
3 from there and drove to Voinjama to make sure whether Sam
4 Bockarie was the real Sam Bockarie I brought over. That was the
09:30:12 5 instruction given from Mr Taylor, according from Robert Bier.

6 Q. Do you accept that it would have been much easier to
7 transport Bockarie on that helicopter back to Monrovia?

8 PRESIDING JUDGE: Mr Griffiths, we did cover this exact
9 question last week. I remember you asking and it being answered
09:30:38 10 on a number of - you did repeat that question several times last
11 week.

12 MR GRIFFITHS: And I have received further instructions
13 from my client, your Honour, which is why I am required to
14 revisit the topic just to deal with one or two additional
09:30:52 15 matters.

16 PRESIDING JUDGE: Very well then.

17 THE WITNESS: Let me help you by repeating the answer.
18 I told you the reason that we could not use the helicopter to
19 escort Sam Bockarie. You remember what happened? When a member
09:31:08 20 of the AFRC travelled through the helicopter from Freetown, they
21 landed in Monrovia. What happened was they were intercepted by
22 ECOMOG and I was bringing Sam Bockarie in secret. What would
23 have been a secret would have used the same helicopter again to
24 be intercepted by ECOMOG? No. That is why Benjamin Yeaten and
09:31:36 25 Musa Cissay met me on the highway because they were the most
26 senior officers, the chiefs of security for the Republic of
27 Liberia, nobody searching their vehicle. Their vehicle had no
28 licence plate. He was the director for SSS, that was why they
29 decided to meet me on the highway to take Sam Bockarie and

1 transfer him to the vehicle and they will use Roberts
2 International Airport route to get to Monrovia.

3 MR GRIFFITHS:

09:32:07

4 Q. The reason I want to revisit this topic is you told us last
5 week that there were no facilities for a helicopter to land at
6 the Executive Mansion, didn't you?

7 A. Never and ever a helicopter landed at the Executive
8 Mansion. I repeat answering that same question: It has never
9 happened.

09:32:30

10 Q. I just want to ask you about some of the facilities there.
11 Would you agree that the Executive Mansion is built on something
12 like 15-plus acres of land?

09:32:52

13 A. I know that the area is there. If the helicopter wanted to
14 land, they would land there. I am not saying that the space is
15 not there. I did not say so. Up to the time I was at the
16 Executive Mansion I never saw one day a helicopter landing there.
17 That is what I am saying.

18 Q. But you agree, don't you, that there is a concrete area at
19 the front of the mansion where a helicopter could land?

09:33:16

20 A. Let me make one thing clear -

21 Q. Yes or no, Mr Sheriff?

22 A. It is so.

23 Q. Do you also agree that there is a soccer ground within the
24 grounds of the mansion?

09:33:30

25 A. Yes.

26 Q. Do you also agree that there is a very large lawn at the
27 rear of the mansion?

28 A. Yes.

29 Q. And one final topic on the matter of helicopters, please,

- 1 could you turn to page 85. Do you see, at line 20 on that page,
2 you are being asked about helicopters and the question is this,
3 "Tell me about the helicopter first though. The first time when
4 they were coming up to Foya in the helicopter, what did the
09:34:19 5 helicopter look like? Did you see the helicopter." You describe
6 it in this way, "With camouflage helicopter", yes? "One with
7 fatigue, one with camouflage." Do you see that?
8 A. Yes.
9 Q. Is that right?
09:34:38 10 A. Yes.
11 Q. Turn the page to page 86, please, line 5, "One was fatigue,
12 fatigue green, all green. It was army colour." Yes, do you see
13 that?
14 A. I saw it.
09:35:01 15 Q. And the camouflage colour, what colours were they?
16 A. The camouflage colour I say is green, some black, mixed up
17 colour.
18 Q. Do you ever recall any helicopter being available to the
19 Liberian Government which was not of those colours?
09:35:24 20 A. Anti-terrorist camouflage the helicopter, the helicopter
21 that Mr Taylor assigned to anti-terrorist.
22 Q. What colour were they?
23 A. All the two helicopters were controlled by them.
24 Q. What colour were they? What colours were they painted?
09:35:49 25 A. Fatigue camouflage.
26 Q. Fatigue camouflage?
27 A. Yes.
28 Q. Did you ever see a red and yellow helicopter?
29 A. That was during the campaign time and I did not know

1 whether it was the same helicopter that was camouflaged about the
2 time when Lofa was attacked, when this helicopter was used by the
3 anti-terrorist to bomb the Lofa area and the surrounding it was
4 camouflaged and fatigued.

09:36:28 5 Q. What colour camouflage, green?

6 A. Camouflage was a mix of colours. It could be black would
7 be there and green would be there.

8 Q. Now, the next topic that I want to move onto, please, is
9 arms and the RUF. Do you follow me?

09:36:51 10 A. Yes.

11 Q. Would you agree that the vast majority of the arms you know
12 went to the RUF was bought by the RUF from former ULIMO
13 combatants?

14 A. That is not true. Arms were coming through Roberts
09:37:34 15 International Airport and I saw Sam Bockarie at the international
16 airport. Equally so I saw Zigzag Mazhar, whom I saw publicly,
17 and I asked him and he told me he was taking the arms to Sam
18 Bockarie and that he had some money. He was taking it to Sam
19 Bockarie also. I also visited Foya when I saw Benjamin Yeaten
09:37:57 20 and Sam Bockarie together. When my bodyguard came from Sierra
21 Leone, from Buedu, he told me that a truck loaded of arms were
22 with Sam Bockarie and he saw it.

23 Q. Very well. Let us examine that in a bit more detail then,
24 shall we? Do you agree, Mr Sherif, that many commanders, for a
09:38:32 25 number of reasons, be it personal, financial, ethnic, or tribal,
26 did things without the authority of President Taylor?

27 A. Please repeat that question.

28 JUDGE DOHERTY: Mr Griffiths, commanders of what
29 organisation?

1 MR GRIFFITHS: Very well.

2 Q. Would you agree that commanders of the various militias and
3 factions, following the election of President Taylor, would often
4 do things without his authority?

09:39:11 5 A. Yes.

6 Q. And that would be for personal, financial, ethnic, or
7 tribal reasons. Would you agree?

8 A. Except you explain that in detail so that I could
9 understand the question correctly.

09:39:35 10 Q. Very well, let me put it in this way: The combatants from
11 the various factions were not being paid a monthly allowance or
12 salary, were they?

13 A. After the elections, is that what you mean?

14 Q. Yes.

09:39:59 15 A. Mr Taylor only paid those who were obligated to him.

16 Q. Would you agree that the vast majority of the combatants
17 were not paid any monthly allowance or salary?

18 A. Who was paying them?

19 Q. Let me ask a more specific question: The former ULIMO
09:40:24 20 combatants, were they being paid following the election of
21 President Taylor?

22 A. He assisted them with some money: The 20,000 that he gave
23 that we divided amongst the former combatants. That he did and
24 also he used to give rice every month for former ULIMO-K. That
09:40:58 25 happened for one year time.

26 Q. Is it not the case that some commanders of factions and
27 militias would sell arms that were assigned to them by the
28 Liberian Government in order to make some money on the side?

29 A. I did not understand that correctly.

1 Q. Is it not the case that arms and ammunition distributed to
2 commanders by Mr Taylor's government would often be sold
3 illegally to, for example, the RUF in order to make money on the
4 side?

09:41:50 5 A. I think those who were assigned in Lofa and Mr Taylor
6 assigned guns to them, they might have done that because I was
7 not there and I did not witness anything like that.

8 Q. Let me ask you about an aspect of it which you might be
9 able to help us with then. Did ULIMO buy arms from ECOMOG
10 officers and soldiers?

11 A. I don't know. I was not the leader of ULIMO. I was just
12 there to receive instruction as the commander at the battle front
13 and I will receive whatever I needed to fight the war. I think
14 the leader of ULIMO could be the best person to be asked that
09:42:44 15 question. I am not aware.

16 Q. I am asking you because of the senior position you held in
17 ULIMO and what I am suggesting is that you did buy arms illegally
18 from ECOMOG, didn't you?

19 A. No.

09:43:02 20 Q. Did ULIMO do deals with Sierra Leonean military officers in
21 the border areas in order to obtain arms, in addition to official
22 help given by the Sierra Leonean Government?

23 A. We had a base in Sierra Leone when we were fighting inside
24 Liberia and when we were fighting inside Liberia our base in
09:43:35 25 Sierra Leone never dissolved and we still had the battle front at
26 Daru barracks and we still had ULIMO members staying there and
27 they were still getting their supplies. Therefore, we used to
28 receive assistance from them, that is true.

29 Q. Apart from the official assistance you were getting, Sierra

1 Leonean soldiers and commanders in that border area were also
2 doing their private deals with you, weren't they?

3 A. That is true. Deals were never finished. It would never
4 be ended.

09:44:13 5 Q. And similar deals were being done with Guinean troops on
6 the Guinea border, weren't they?

7 A. I am not aware of that.

8 Q. That is Guinean soldiers, because they were badly paid,
9 would supplement their income by selling their arms illegally to
09:44:39 10 groups like ULIMO, didn't they?

11 A. ULIMO never had arms shortage. The reason why ULIMO had
12 strong force was because sometimes we captured areas and we would
13 get arms from there, and sometimes we captured NPFL areas and we
14 captured arms together. At the same time ULIMO was fighting in
09:45:10 15 Sierra Leone and they were supplying their colleagues.

16 Q. Because generally this is right, isn't it: At that point
17 on the map where Sierra Leone, Liberia and Guinea meet, at the
18 top end of Lofa County, there was a brisk business going on in
19 arms, food, diamonds and looted goods, wasn't there?

09:45:42 20 A. Of course I will not say no to that. That is the war.

21 Q. In effect, that part of the world where Guinea, Sierra
22 Leone and Liberia joined, it was like the Wild West for the most
23 part, wasn't it?

24 A. Yes, of course.

09:46:09 25 Q. Now, the final matter I want to ask you about in this
26 interview before we move on, could you turn to page 41, please,
27 41, bottom right-hand corner, 00036773 at the top. Do you have
28 it?

29 A. Yes.

1 Q. Now, this interview commenced at 10.24. About 45 minutes
2 into the interview, and it begins at line 7, we see this, "We are
3 going to let the Court Reporter catch up a little and then we
4 will talk about something else off the record." Then there was a
09:47:25 5 break from 11.16 until 11.28. What were you talking about off
6 the record for that period?

7 A. What record is that?

8 Q. Do you know what the phrase "off the record" means?

9 A. No.

09:47:54 10 Q. It means that somebody wants to talk to you about something
11 but they don't want it recorded for posterity so that people can
12 see it afterwards, so what I am asking you is: What was so
13 sensitive that you were being talked about, off the record, for
14 10 or so minutes in the middle of this interview?

09:48:23 15 A. I cannot remember that right now.

16 Q. Try and help us, please.

17 A. No.

18 Q. Is there anything that you would have wanted to talk to the
19 OTP about off the record?

09:48:41 20 A. I told you these things are taking some time. I cannot
21 remember that I explained something to them off the record.
22 I cannot remember now.

23 Q. Were you being made promises off the record in order to
24 give information?

09:48:57 25 A. If I was promised or what?

26 Q. If you were made promises that you would get money, or any
27 other benefit, if you were willing to provide certain evidence?

28 A. No.

29 Q. Try and help us, please, because you were there and we see

1 that Mr Santora, who sits at the back of the Court, was there,
2 but obviously because he is a lawyer he can't give evidence, so
3 I am asking you. What were you talking about off the record,
4 please?

09:49:38 5 A. That is why I have explained to you that I cannot remember
6 what I had explained that it was off record. I cannot remember
7 it now.

8 Q. Let us move on then, shall we? That is all I want to ask
9 you about in relation to that interview.

09:50:12 10 If we turn to page 90 now, please. Just for completeness,
11 so that we are all following, following that interview a summary
12 of that interview was created and that summary commences at
13 page 90 and it goes through to page 91. I mention that just for
14 completeness, so that when in future anyone looks at this bundle
09:51:01 15 they will understand the significance of that.

16 Now, do you remember last week I gave you a document like
17 this, Mr Sheriff? Mr Sheriff, this document, do you remember it?

18 A. Yes.

19 Q. Can we have this document now on the screen, please, the
09:51:21 20 first page.

21 PRESIDING JUDGE: For the record, Mr Griffiths, this is a
22 document reflecting your computation of payments made to the
23 witness on each day of the interview.

24 MR GRIFFITHS:

09:51:36 25 Q. This document shows the correlation between interviews
26 conducted with you and payments received by you, either at the
27 time, or afterwards. Now, what we know is this: Following that
28 interview on 23 February 2005, on 9 March you received 70 US
29 dollars. What was that for?

1 A. To cover my expenses.

2 Q. What expenses?

3 A. The distance they called me from and they did not provide a
4 car. I have to use my own vehicle to come to the area where they
09:52:27 5 wanted to see me.

6 Q. I understand that you were working in Monrovia, weren't
7 you?

8 A. If I was working, I was not working for the Special Court.

9 Q. In February 2005 you were working in Monrovia, weren't you?

09:52:46 10 A. I said it: If I am working, I was not working for the
11 Special Court. If you need my time you have to cover my
12 expenses.

13 Q. Mr Sheriff, what part of the question I just asked you did
14 you not understand? Let me try it again: Were you at the time
09:53:07 15 of the interview in February 2005 living in Monrovia, yes or no?

16 A. Yes, I was living in Monrovia.

17 Q. Didn't the interview take place in Monrovia?

18 A. Yes.

19 Q. And so help us, how much travelling expenses did you
09:53:35 20 generate to travel within Monrovia for this interview?

21 A. The amount was given to cover my expenses out.

22 Q. Now, that interview lasted from 10.24 until 12.37, so about
23 two hours. Were you charging an hourly rate of about 35 US
24 dollars for your time?

09:54:02 25 A. I was giving - it was given to me to cover my expenses and
26 that was it.

27 Q. If that be right, you were given that 70 US dollars on 9
28 March, thereafter on 8 September, even though you had no further
29 interview, and again on 9 September, you were given a further

1 150 - these figures are to be found at page 155, your Honours.

2 You were given a further 155 US dollars. What was that for?

3 A. They wanted for me to get somebody for them and that person
4 was living in Bong Mines. I had to hire a car to go and get that
09:54:59 5 individual from there.

6 Q. Basically then what we have is this: Following that
7 interview on 23 February you were paid a total of 250 US dollars
8 when, according to this, you attended no further interview. What
9 was all of that money for, Mr Sheriff?

09:55:25 10 A. I told you basically some of the people, some time when
11 they do come they call me and said they want me to help to get
12 somebody and sometimes that individual does not live in Monrovia.
13 Where he lives, they will give me transportation to go and locate
14 that individual. Some of the people were way in Nimba. Some of
09:55:50 15 the people were in Gbarnga, so that was the amount to cover the
16 expenses.

17 Q. So are you saying that you were conducting investigations
18 on behalf of -

19 A. No, no. I told you that they asked me, "Please to go and
09:56:10 20 locate John Brown for us, or Peter Brown for us." If I do know
21 I can assist and I can get that person I will tell them, "From
22 there this is so so area the person is living, I have to hire a
23 car to go there and come back."

24 Q. Help us, how many witnesses did you manage to locate for
09:56:31 25 the Office of the Prosecutor?

26 A. I think there were three persons.

27 Q. When did you locate those individuals?

28 A. Nimba, Gbarnga -

29 Q. When not where.

1 A. I cannot remember the time or the date again.

2 Q. Was it in the period immediately after that interview on 23
3 February?

4 A. It happened after my own interview.

09:57:07 5 Q. Was that the first interview?

6 A. It did not happen once. I can remember - I cannot remember
7 again.

8 Q. Now, I am helpfully assisted by my learned friend
9 Mr Munyard. We need to investigate these payments in a little

09:57:54 10 bit more detail so I wonder if you would turn to page 154,

11 please. Now, we see here, beginning at the bottom of the page,
12 details of the three payments I have asked you about. No, you

13 have not got it, witness. It is page 154, right at the end of

14 the bundle. Now, you will see the first payment that was made to

09:58:52 15 you on Wednesday, 9 March 2005, the reason why you are given that
16 is stated to be, "Payment made to source to assist OPT to locate
17 witnesses." Do you see that?

18 A. I explain it to you. I said yes.

19 Q. But when we go over the page, the second payment of 100 US
09:59:20 20 dollars, on 8 September 2005, that was for, "Reactivation of
21 source development." What does that mean?

22 A. I do not know the meaning of that English. The only money
23 that was given to me, the first one was to cover my expenses and
24 the others were given to locate witnesses that were needed, to
09:59:45 25 assist them in locating them for them.

26 Q. We see that the payment made on Friday, 10 September is for
27 locating witnesses, but, help us, what was the previous payment
28 made for: "Reactivation of source development"? Can you help us?

29 A. I said I do not know the meaning or the terms. The only

1 money that was given to me first was to cover my expenses. The
2 rest were to locate people they wanted for me to - they wanted to
3 assist them to locate for them.

4 Q. We will come back to those payments in a moment. What we
10:00:35 5 do know is this though, going back to our schedule, that you were
6 further interviewed by the investigators attached to the OTP on 8
7 and 9 July 2006. Now, we find the summary of that interview at
8 page 92 in the bundle. I want to ask you about certain aspects
9 of this, please. We see that this was supposedly, and I am
10:01:33 10 looking at the second line of the first paragraph, a
11 clarification interview conducted in Monrovia, Liberia, and
12 present were two individuals from the Office of the Prosecutor:
13 David Cunningham and Joseph Sesay. Do you recall this meeting?

14 A. I do not know their names again.

10:01:59 15 Q. But do you recall that following that interview in February
16 2005, the next time you were interviewed was over a year later in
17 July 2007?

18 A. That is why I said I cannot remember the people's name.
19 They were changing from one - you will see some people today and
10:02:24 20 after one or two months you see another set of people.

21 Q. Now, what we see here is this, looking at the body of this
22 summary -

23 A. Yes.

24 Q. You see the summary of interview:

10:02:45 25 "As highlighted in the previous interview, the witness has
26 knowledge of the fact that Sam Bockarie went to Monrovia to meet
27 Taylor following the fall of the AFRC/RUF government. As stated
28 in the previous interview, so far as the witness is aware Taylor
29 had not met Bockarie prior to this and all previous

1 communications between them had been by telephone."

2 Yes?

3 A. Yes, that is previously, as according to what Sam Bockarie
4 explained to me.

10:03:25 5 Q. Now, if I recall what you told us when you were being
6 examined in chief, after the stopover in Voijnama you drove to
7 Wiesua, did you not, where you were met, Sam Bockarie was taken
8 away and you continued on into Monrovia with his bodyguards?

9 A. Yes.

10:03:51 10 Q. When we look at the second paragraph:

11 "Following the communication with Montgomery, Bockarie
12 travelled in a five vehicle convoy through Lofa County to
13 Gbarnga. At Gbarnga Bockarie was met by Yeaten and Musa Cissay
14 and taken to Monrovia."

10:04:16 15 So was it at Wiesua, or was it at Gbarnga that you were
16 met?

17 A. That area is not clear. I said Wiesua.

18 Q. Help us, why is it that here we see that that meeting took
19 place at Gbarnga and not Wiesua?

10:04:39 20 A. I said I did not say they had a meeting. When we were
21 coming from Monrovia, when Mr Taylor told me, "Do you know the
22 area where you met Sam Bockarie, travelled, when Benjamin Yeaten
23 - when they took Sam Bockarie from your vehicle?" He said, "Go
24 back there. If you don't see them just wait a little bit and you
10:05:06 25 will see them." I got to Wiesua. They were not in Wiesua. To
26 my understanding they were in Gbarnga, maybe having some meeting
27 with Musa and Benjamin Yeaten. That was my understanding.

28 Q. Mr Sheriff, what you told us was on the journey back to
29 Monrovia, having met with Sam Bockarie, you parted company with

1 him at Wiesua. Here you are saying it is Gbarnga. Was it
2 Gbarnga, or was it Wiesua?

3 A. It was in Wiesua.

4 Q. Can you help us as to why it was that in this interview, in
10:05:55 5 July 2006, you were saying it was Gbarnga and not Wiesua?

6 A. They did not understand that one from me clear. The person
7 who wrote that paragraph did not get it clear.

8 Q. The reason why I am asking you about these details,
9 Mr Sherif, is this: I am suggesting you are lying about this
10:06:19 10 whole trip, which is why your account is constantly changing. Do
11 you understand me? I am not nit picking, but help us, Gbarnga is
12 a different place from Wiesua, isn't it?

13 A. I have explained the truth. I have no reason to lie. Even
14 if the baby was just 6 years, 7 years, within the entire of
10:06:51 15 Liberia, if you ask them who brought Sam Bockarie to Liberia to
16 meet Taylor they will tell you, "It is Sherif." From the branch,
17 from the end, everywhere they will tell you.

18 Q. Let me try my question: Gbarnga is a different place from
19 Wiesua, isn't it?

10:07:08 20 A. And I said it clear. I did not say Gbarnga, I said Wiesua.

21 Q. Gbarnga is a different place from Wiesua, isn't it?

22 PRESIDING JUDGE: Can I appeal to the witness and counsel
23 please not to speak over each other's voice. This really messes
24 up the record. Let each of you wait for the other one to finish
10:07:27 25 before you respond, please.

26 MR GRIFFITHS:

27 Q. Mr Sherif, I am going to repeat my question slowly. Please
28 listen to the question. If you don't understand it, tell me, and
29 then please do me the courtesy of an answer. Gbarnga is a

1 different place from Wiesua, isn't it, yes or no?

2 A. Yes.

3 Q. Can we go to the final paragraph on that page, please:

4 "In relation to the purchase of arms by the RUF from ULIMO,
10:08:11 5 the witness states that Taylor's intention has been to, 'Open
6 corridors between Liberia and Sierra Leone so that Sam Bockarie
7 could have free movement back and forth and people from Lofa
8 should have free movement to Sierra Leone.' If the people
9 brought the arms forward for sale to Sam Bockarie, no-one would
10:08:31 10 have anything to fear about trading these arms. This information
11 was spread to the fighters in the Lofa area."

12 Who were you quoting there?

13 A. Please read the passage very slowly so that I will be able
14 to understand.

10:08:53 15 PRESIDING JUDGE: Is the witness looking at the page?

16 THE WITNESS: I am looking at it.

17 PRESIDING JUDGE: The bottom paragraph.

18 THE WITNESS: Yes, I am looking at it, but I want him to
19 read it slowly.

10:09:06 20 MR GRIFFITHS:

21 Q. "In relation to the purchase of arms by the RUF from ULIMO
22 the witness states that Taylor's intention had been to, 'Open
23 corridors between Liberia and Sierra Leone so that SB" - and
24 I guess that stands for Sam Bockarie - "could have free movement
10:09:29 25 back and forth and the people from Lofa should have free movement
26 to Sierra Leone?'"

27 Who were you quoting in that passage?

28 A. An instruction from Mr Taylor, so that Sam Bockarie could
29 have free movement between Lofa area to RUF territory.

1 PRESIDING JUDGE: Ms Hollis.

2 MS HOLLIS: Thank you, your Honour. Perhaps it will assist
3 this line of questioning and, in fairness to the witness, this is
4 entitled a "Summary of Statement", and in the context of this the
10:10:11 5 Prosecution would suggest that it is not the witness who is
6 quoting, it is the person who is preparing the statement who is
7 quoting the witness.

8 PRESIDING JUDGE: Mr Griffiths, that would appear to make
9 sense to me. Whatever is quoted is trying to verbatimly [sic]
10:10:29 10 quote the interviewer or interviewee.

11 MR GRIFFITHS: Your Honour, I must make this observation:
12 It is somewhat curious that if the person who summarised this
13 interview was in a position to create this document and quote
14 from what appears to be a contemporaneous note, that we have
10:10:50 15 never been provided with that contemporaneous note, only the
16 summary.

17 PRESIDING JUDGE: What do you mean by a contemporaneous
18 note?

19 MR GRIFFITHS: It would appear from the quotation marks,
10:11:02 20 and I am helpfully assisted now by my learned friend, that the
21 quotation marks refer to a transcript of the interview. I would
22 like to see the transcript of the interview, please, if it is
23 available.

24 PRESIDING JUDGE: Ms Hollis, what is your response to this?

10:11:20 25 MS HOLLIS: Thank you, your Honour. There is no transcript
26 of this interview, unlike the taped transcript that was
27 transcribed. The person taking the interview did, as I
28 understand it, take notes. There was certainly no transcript.
29 Those notes were then put into this typed version of this

1 statement, so the typed version reflects the information received
2 by the person conducting the interview.

3 PRESIDING JUDGE: In any event, it would appear to me,
4 Mr Griffiths, really, that the person being quoted is actually
10:11:59 5 the witness himself.

6 MR GRIFFITHS: But I need to pursue this a little further,
7 your Honour. I would not like to see, and I make the request
8 publicly, the original notes -

9 JUDGE LUSSICK: Put your microphone on, please.

10:12:16 10 MR GRIFFITHS: I would like to see, please, the original
11 notes taken by whoever it was who conducted the interview on
12 those two days in July 2006. I ask for this reason, your Honour:
13 Your Honour will see that this summary is three pages long yet
14 the interview lasted two days. I would like to see the original
10:12:41 15 notes and I suggest that I am entitled to it.

16 PRESIDING JUDGE: I am sure if it does exist it will be
17 provided. Ms Hollis?

18 MS HOLLIS: That is correct, your Honour.

19 PRESIDING JUDGE: So with that caveat, please continue your
10:12:59 20 cross-examination.

21 MR GRIFFITHS: Your Honour, can I just lay down this
22 particular marker: There are a number of instances in this
23 bundle where interviews have been summarised in this way and
24 I put the Prosecution on notice that in every instance I would
10:13:16 25 like to see the original notes and not only in relation to this
26 witness, but in relation to any witness the Prosecution intend to
27 call where they have served us disclosure of a summary but not
28 the original notes. In our submission, in law, fairness dictates
29 that we should be provided with all that material.

1 PRESIDING JUDGE: Ms Hollis, is this the case? Are you
2 withholding the original notes from the Defence?

3 MS HOLLIS: The information in the original notes has been
4 provided in the typed form. The Defence counsel has said in law
10:13:56 5 they should be provided the original notes. In many
6 jurisdictions, in law, if the original notes are then put in
7 total into a typed form they need not be provided unless the
8 Defence ask for it. The Defence counsel has asked for it and we
9 will certainly ensure that they receive it.

10:14:17 10 PRESIDING JUDGE: Very well. Let us proceed.

11 MR GRIFFITHS:

12 Q. We are at the bottom of page 92, Mr Sherif. Mr Sherif, did
13 you have a conversation, in the terms as set out in that
14 paragraph, with President Taylor?

10:14:55 15 A. I did not understand. I did not get your question correct.

16 Q. I am asking you about the last paragraph on page 92. Do
17 you have it?

18 A. Yes, yes.

19 Q. Do you see you make references to opening corridors between
10:15:16 20 Liberia and Sierra Leone and so on?

21 A. Yes.

22 Q. Are you there referring to a conversation you say you had
23 with President Taylor?

24 A. I am referring to the conversation I had with Mr Taylor.

10:15:39 25 Q. When?

26 A. In 1998.

27 Q. Try and be a bit more specific: When?

28 A. 1998.

29 Q. Where did that conversation take place?

1 A. White Flower.

2 Q. Who else was present?

3 A. Osibio Dembi was there and Musa Cissay was there.

4 Q. I suggest that is a lie and you have never had any such
10:16:26 5 conversation with him. That is the truth, isn't it, Mr Sheriff?

6 A. This is not true. I have told you I have no reason to lie
7 here. I have nothing personal against him for which I must lie.

8 Q. Can we turn over the page, please, to page 93. The last
9 three lines of the first paragraph on that page, do you see,
10:17:14 10 "Taylor appointed Christopher Varmoh, Liberian Mosquito, as
11 commander of the NPFL. He was commander of Lofa County and based
12 out of Vahun." Is that true?

13 A. Yes.

14 Q. Then if we miss the next paragraph and go to the paragraph
10:17:37 15 thereafter which begins, "In the previous interview the witness
16 advised that Taylor arranged for money to be sent with ZZ Mazhar
17 to Mosquito in order that Mosquito could buy arms from the former
18 faction fighters in Lofa. In the clarification interview" - that
19 is this interview - "the witness states that he did not visually
10:18:00 20 see the money transaction." Is that true?

21 A. I did not see the money transaction with who?

22 Q. With anybody. Is that true?

23 A. No, I did not understand that question. Please repeat that
24 question.

10:18:22 25 Q. "In the clarification interview the witness states that he
26 did not visually see the money transactions." Is that true?

27 A. The question is not clear to me. The money transaction
28 with who now? Because there were several transactions: RUF had
29 their money coming, Voijnama area, buying their arms and go, and

1 of course ZZ Mazhar who too had money and he had ammunition and
2 he was taking them to Sam Bockarie. I do not know which of the
3 transactions you are referring to.

4 Q. Were you ever present -

10:19:06 5 PRESIDING JUDGE: Mr Interpreter, I personally do not
6 follow what you are saying. Are you speaking English?
7 Mr Interpreter, are you speaking English, or are you speaking
8 Krio?

9 THE INTERPRETER: English.

10:19:24 10 PRESIDING JUDGE: Then please make yourself understood. We
11 are just not following what you are saying. Please make an
12 effort to make yourself understood. If the problem is that the
13 witness is speaking too fast, let us know that so that he will
14 speak a little slower. We just don't understand some of the
10:19:43 15 words you are saying.

16 THE INTERPRETER: Right, your Honour.

17 PRESIDING JUDGE: Mr Griffiths, I apologise. Let us start
18 again.

19 MR GRIFFITHS: Not at all. Mr Sheriff, did you ever witness
10:19:56 20 a money transaction involving the sale of arms to the RUF?

21 A. Yes, when Superman came he was buying arms in Voinjama
22 District, taking them over to Sam Bockarie. I witnessed that.

23 Q. Who handed the money over?

24 A. I told you earlier that Mr Taylor said he was going to
10:20:37 25 provide money for Sam Bockarie, either himself or that he was
26 going to use who he would use to buy arms.

27 Q. I am not interested in that. I am asking you about the
28 transaction you say you witnessed. Who handed money over?

29 A. Superman had the money and he was buying arms in Voinjama

1 District.

2 Q. Who did he give the money to?

3 A. Former fighters who were selling arms to him.

4 Q. And which faction were these fighters from?

10:21:24 5 A. All factions, including NPFL.

6 Q. So the money was going to individual combatants, was it?

7 A. You have it clear, yes, yes.

8 Q. So when we see in this summary, "did not visually see the
9 money transactions", can you help me as to what you were talking

10:21:57 10 about?

11 A. I saw that the transaction was going on. The people - the
12 Superman I am referring to, when I took Sam Bockarie to Monrovia
13 Superman went along with Sam Bockarie and when we went to
14 Voinjama they went to our area, Sheriff Quarters, so at any time
10:22:26 15 he came from RUF territories he will always have to stop at
16 Sheriff Quarters, so I knew what he was doing and he used to
17 explain to me what he had in his hands.

18 Q. Let us move on then, shall we, to the next paragraph and
19 I want to ask you a few questions about this. Do you see the
10:22:48 20 paragraph begins:

21 "The witness advises that the arms being supplied to the
22 RUF were coming from all warring factions: From ULIMO, NPFL,
23 Liberian Peace Council. Initially Taylor instructed that all the
24 arms that were to be obtained from the ULIMO fighters in Lofa
10:23:13 25 should be brought to Monrovia, but after the recruitment and
26 deployment Taylor ordered that all weapons from Lofa should be
27 diverted to Sierra Leone. At first weapons were taken to Sierra
28 Leone on a weekly" -

29 THE INTERPRETER: Your Honours, could counsel go slowly so

1 that the interpretation will go accordingly.

2 MR GRIFFITHS: I was not aware that I was going so fast,
3 but let me start again:

4 "The witness advises that the arms being supplied to the
10:23:48 5 RUF were coming from all warring factions: From ULIMO, NPFL,
6 Liberian Peace Council. Initially Taylor instructed that all the
7 arms that were obtained from the ULIMO fighters in Lofa should be
8 brought to Monrovia, but after the recruitment and deployment
9 Taylor ordered that all weapons from Lofa should be diverted to
10:24:27 10 Sierra Leone. At first weapons were taken to Sierra Leone on a
11 weekly basis, but then Bockarie took control of the entire Lofa
12 area and the fighters carried weapons all the time in bags, or
13 any way they could, into Sierra Leone. The arms being sent to
14 Sierra Leone consisted of RPG and their bombs, AK-47s and the
10:25:06 15 ammunition. According to information given to the witness,
16 fighters were being paid \$200-300 per weapon. Further, the
17 witness states that some weapons were exchanged for looted items
18 which had been taken from Freetown during the invasion. The
19 witness states that this all occurred just after the Freetown
10:25:41 20 invasion in 1998 and during the ECOMOG intervention."

21 Now, do you agree with all of that?

22 A. Yes.

23 Q. So the sale of arms that you are describing here was being
24 done on an individual basis by former combatants?

10:26:14 25 A. They were doing it individually after the instruction
26 because at first I was taking the arms and ammunition. That was
27 a group material, a group of arms and ammunition that we had
28 kept. I took them to Monrovia and after he met Sam Bockarie he
29 later called me and instructed me that no arms must come to

1 Monrovia again. He said, "You should go to Lofa and talk to the
2 former combatants, that they should feel free and that anybody
3 who had arms and that I have given some money to Sam Bockarie, he
4 will send some commanders or he himself will come and buy them
10:26:57 5 from them", or that anybody who wanted to go to RUF territory
6 with his arms to sell it, "Nobody will disturb you, nobody will
7 do anything else to you so, if you want to, you can go there and
8 do your transaction." That was what he said.

9 PRESIDING JUDGE: Mr Witness, who is this "he" you keep
10:27:20 10 referring to?

11 THE WITNESS: I am referring to the former President
12 Taylor. The instructions were coming from him directly to me.

13 MR GRIFFITHS:

14 Q. You are aware, witness, aren't you, that the Freetown
10:27:34 15 invasion took place in 1999 and not 1998?

16 A. When I say Freetown invasion, the first one happened after
17 they had removed the AFRC government in power. That is what I am
18 referring to. After the removal of the AFRC government, that one
19 took place in 1998, the start of the year.

10:28:14 20 Q. Turn over the page, please, to page 94, the first full
21 paragraph on that page, "The witness states -

22 PRESIDING JUDGE: Mr Griffiths, I intend to go on until
23 10.35 to try and make up for lost time over the next three days
24 if that is okay with you.

10:28:55 25 MR GRIFFITHS:

26 Q. "The witness states that groups of former combatants in
27 Liberia who were trading looted property, arms, or diamonds were
28 invited into Sierra Leone openly by Bockarie with the guarantee
29 that nothing would happen to them. Many of the people who

1 crossed over were recruited into the RUF and this was one of the
2 ways in which the RUF got more manpower. In relation to the
3 reference to ULIMO, the witness clarifies that the name ULIMO
4 only came up in the area of Lofa County. At this time the RUF
10:29:53 5 were not dealing with a specific warring faction. They were
6 dealing with all those interested in coming over to Sierra
7 Leone."

8 And then this:

9 "Taylor did not have any specific influence with these
10:30:18 10 people, only to the extent that he was condoning free movement
11 across the border. Many people crossing over to Sierra Leone did
12 not return, such as private people who were going to diamond
13 mining areas like Tongo."

14 Pause there. Where you say, "Taylor did not have any
10:30:54 15 specific influence with these people," what did you mean?

16 A. What I meant, the people were going there by themselves.
17 Their lives were guaranteed by Mr Taylor that nothing will happen
18 to any one of them. That is what I am referring to.

19 Q. Is this a fair description: That because of the
10:31:20 20 lawlessness of that area Mr Taylor really didn't have a great
21 deal of influence over it?

22 A. This lawlessness started after Sam Bockarie had visited
23 Monrovia. After the elections the former combatants of ULIMO
24 were very, very quiet in their respective areas. Up to the time
10:31:56 25 I was there taking arms to be carried to Monrovia, the area was
26 quite normal, but when the freedom was given to everybody that
27 was the time the lawlessness started in that area.

28 Q. Do you agree that Mr Taylor had very little influence in
29 the area?

1 A. Later he made a deployment in the area. At the end of 1998
2 to 1999 he deployed army and police in the entire Lofa area.

3 Q. Can I try the question again, one final time. Do you agree
4 that President Taylor had very little influence in that area?

10:32:52 5 A. Not 1998, at end of 1998 to 1999.

6 Q. But are you saying that throughout 1998 he did not?

7 A. No.

8 Q. Just help me, please, when do you say - just give us a
9 bracket of dates. When do you say his influence was diminished
10 in that area?

11 A. I did not understand that question.

12 Q. Was there a time, do you say, when Mr Taylor did not have
13 any influence in that area?

14 A. I said after the election. After the elections Mr Taylor
10:33:57 15 never had control over the other warring factions' territories,
16 but little by little he started deploying men around Bomi Hills,
17 Grand Cape Mount, Lofa County, Bopolu. He started having control
18 over the entire area.

19 PRESIDING JUDGE: Would that be a good place to break?

10:34:26 20 MR GRIFFITHS: As good as any.

21 PRESIDING JUDGE: Thank you. We will break until 11.00.
22 Thank you.

23 [Break taken at 10.35 a.m.]

24 [Upon resuming at 11.00 a.m.]

10:59:03 25 PRESIDING JUDGE: Mr Griffiths, please continue.

26 MR GRIFFITHS: May it please your Honour.

27 Q. Mr Sheriff, we were at page 94 --

28 THE INTERPRETER: Could counsel put on his microphone,
29 please.

1 MR GRIFFITHS:

2 Q. We were at page 94 when we adjourned. Could you go back to
3 that page, please. I want to ask you now, please, about that
4 third full paragraph on that page. The paragraph which begins:

10:59:38 5 "The witness states that Yeaten went frequently to Foya and
6 would meet Bockarie there on a regular basis. Yeaten was
7 accompanied by Mazhar, Sampson and other bodyguards. While the
8 witness understands that Yeaten took arms and ammunition with him
9 on these trips" - this is the important part that I want to
11:00:20 10 concentrate on - "he has no direct knowledge that they were
11 turned over to Bockarie."

12 Is that the truth?

13 A. I said I did not see Benjamin Yeaten handing over arms and
14 ammunition directly to Sam Bockarie. Only that the bodyguards
11:00:50 15 who came from bodyguard that he assigned, they told me that they
16 saw a truck loaded of ammunition in Buedu given to Sam Bockarie
17 in their presence.

18 Q. Now that is all I wish to ask you about those interviews
19 conducted on 8 and 9 July 2006, but when we go back to this
11:01:24 20 document, our schedule - Madam Court Manager, I wonder if we
21 could put this document up, please - we see that following those
22 interviews on 27 July - on 22 July, I'm sorry, you received 50 US
23 dollars - this is page 155, your Honours - 50 US dollars for
24 transport, meals and communication. Now help us, in July 2006
11:02:17 25 were you still living in Monrovia?

26 A. I was in Monrovia.

27 Q. And interviews conducted with you in July 2006, were they
28 too conducted in Monrovia?

29 A. All the interviews were conducted in Monrovia.

1 Q. Thank you. In any event, the next interview that I want to
2 ask you about took place on 30 July 2006. Can we go, please, to
3 page 94 A in the bundle. I wonder if we could put up on the
4 screen the two photographs A and B which comprise MFI-3.

11:03:56 5 PRESIDING JUDGE: That is MFI-3 A and MFI-3 B.

6 MR GRIFFITHS: Your Honour, yes. I wonder if we could
7 arrange the photographs in such a way that we have both on the
8 screen at the same time, please.

9 Q. Now do you recall being asked questions about these two
11:04:36 10 photographs, Mr Sheriff?

11 A. Yes.

12 Q. Now when we go to page 94 A - does the witness have page 94
13 A before him - we see that on 30 July 2006 at the Urban
14 Renaissance Hotel in Monrovia you were seen by investigators
11:05:18 15 attached to the Office of the Prosecutor and you were asked about
16 these two photographs. Now looking at page 94 A it says that
17 picture number 1 was taken during the dry season of 1998. Now
18 when were these photographs taken, please, Mr Sheriff?

19 A. These photographs, one was taken at the border of Sierra
11:06:11 20 Leone, one was taken in Foya.

21 Q. The one that top, where was that taken?

22 A. At the border between Sierra Leone and Liberia.

23 Q. And you are the person in that photograph second from the
24 right, you told us?

11:06:38 25 A. I am the one with the face cap.

26 Q. You're the one as we look at it - just so that we're
27 certain about this I wonder if you can just indicate so that
28 everyone can see. No, indicate on this one, please, so that
29 everyone can see who it is you're referring to?

1 A. You see it [Indicated].

2 Q. Now we can see that in that photograph you are not wearing
3 a uniform, are you?

4 A. Yes.

11:07:25 5 PRESIDING JUDGE: You mean no, you are not wearing a
6 uniform?

7 THE WITNESS: At that time I was not wearing uniform.

8 MR GRIFFITHS:

9 Q. And what precisely can we see in that pick-up?

11:07:54 10 A. Arms and ammunition.

11 Q. Would you point to a gun or some ammunition for me, please?

12 A. Inside the pick-up the things that you see, like white, you
13 can see, arms were taken from under, underneath the ground, so
14 you can see them in the pick-up. That is why you see them like

11:08:25 15 this.

16 Q. So what can we actually see on the photographs? What is
17 that?

18 A. I have told you that inside the vehicle I had I had arms
19 and ammunition in it and I was turning it over to Sam Bockarie.

11:08:46 20 Q. I am just trying to find out, Mr Sheriff, as I look at that
21 top photograph whatever is visible in the back of the pick-up,
22 what am I looking at, please?

23 A. Arms and ammunition.

24 Q. Am I looking at a pile of mud in the back of that pick-up?

11:09:24 25 A. I said to you I had arms and ammunition in the pick-up.

26 Q. Were the arms and ammunition covered by anything?

27 A. Some were in bags with mud on it, all over it, and some
28 were not in bags. Some were in rice bags with mud all over it,
29 some were not in bags.

1 Q. Now when we look at the second photograph, when was that
2 taken in relation to the first photograph?

3 A. When I was getting closer to Foya I was in uniform and when
4 I got to Foya I met Sam Bockarie. I was even expecting Sam
11:10:38 5 Bockarie in Foya. I was going to Buedu, but I met him in Foya,
6 and I wouldn't have been in the uniform in the Liberian territory
7 and then I do the transaction with Sam Bockarie. That was the
8 reason why I changed into civilian clothing at the border. After
9 I had changed into civilian clothing and when we got to the
11:11:08 10 border, that was the time I turned over the arms and ammunition
11 to Sam Bockarie.

12 This uniform was the uniform that Taylor brought into
13 Liberia, they were only brought by Taylor himself, and these
14 uniforms were only meant for use during special operations. That
11:11:32 15 was the only time we used these uniforms.

16 Q. Now as I understand it these photographs were taken on the
17 occasion when you personally handed arms and ammunition over to
18 Sam Bockarie. Is that right?

19 A. The one that you see up, that was the time I was handing
11:11:59 20 the arms and ammunition over to Sam Bockarie. And where you see
21 me in uniform, it was the time I was going to Foya. By then I
22 was in uniform.

23 Q. And help me, the photograph at the top, what was the
24 purpose of taking it?

11:12:20 25 A. At the top where?

26 Q. At the top when you're in civilian clothing. What was the
27 reason for taking that photograph?

28 A. Let me tell you. We had several pictures, snapshots, that
29 I had with Sam Bockarie. That was the time when they said Sam

1 Bockarie was a wanted man and Mr Taylor was trying to hide Sam
2 Bockarie. When he sent Sam Bockarie to Burkina Faso, that was
3 the time I destroyed all the pictures. Even some of my family
4 members had so many photographs, snapshots, that I had with Sam
11:13:03 5 Bockarie, but they destroyed every picture that I had with Sam
6 Bockarie together. And even this one that you see Sam Bockarie
7 on it in particular, that was probably the only one that I was
8 left out. But I had so many snapshots with Sam Bockarie.

9 Everywhere, Foya, Voinjama, Kolahun, everywhere I had snapshots
11:13:29 10 with Sam Bockarie. Maybe after some time, we stay after some
11 time, it is possible that I can see some others.

12 Q. Mr Sheriff, does Sam Bockarie appear in the photograph at
13 the top?

14 A. No. In all the photographs in which Sam Bockarie appeared
11:13:53 15 were all destroyed. We destroyed them all.

16 Q. So even though someone went to the trouble of recording
17 this incident you now cannot lay your hand on a single photograph
18 that shows Sam Bockarie present when this transaction took place.
19 Is that the case?

11:14:18 20 A. That was a reason why I said that when I am given the
21 chance I think I will find them.

22 Q. Well, you've had since February 2005, Mr Sheriff. How is it
23 you've been unable to come up with a photograph showing him
24 present at this transaction?

11:14:43 25 A. The reason, like I told you, when the announcement was made
26 that the United Nations was looking out for Sam Bockarie and when
27 Mr Taylor himself could only keep Sam Bockarie and myself, I was
28 scared and I thought of all the things that myself and Sam
29 Bockarie went through. So we sent this message everywhere to my

1 people in Voinjama and that any photograph on which I appeared
2 with Sam Bockarie together must be destroyed. The person who let
3 me come closer to Sam Bockarie, he also was afraid of the Sam
4 Bockarie issue, then he decided that Sam Bockarie should go to
11:15:29 5 Burkina Faso. Why should I keep photographs on which I appear
6 together with Sam Bockarie.

7 Q. The reason I'm asking you these details, Mr Sherif, just so
8 that you're under no illusion, is that I suggest no such arms
9 transaction took place?

11:15:53 10 A. The arms transaction took place.

11 Q. I am further suggesting that it may well be that these two
12 photographs were taken on two completely unrelated occasions?

13 A. All these pictures are related to the arms that I was
14 handing over to Sam Bockarie.

11:16:23 15 Q. And I'm further going to suggest to you that if in the
16 bottom photograph you were involved in arms dealing, that's when
17 you were a commander in ULIMO?

18 A. Let me make it clear now. If you look at the picture very
19 well you will see the SS badge on my shoulder. If you look at
11:16:56 20 the picture well, the uniform I am using, and this uniform, you
21 can go and find out which one Mr Taylor brought for SODs. These
22 uniforms were bought by Mr Taylor for the SODs special. That was
23 the unit of the police. And part of these uniforms were given to
24 the SSS and in case you were to go on a special operation then
11:17:26 25 you will use it. We never had such a uniform in the Republic of
26 Liberia before. You can go and find out yourself.

27 Q. Do you recall me asking you last week about what uniforms
28 were worn by senior ULIMO commanders. What I'm suggesting is
29 that's the uniform worn by senior ULIMO commanders and, whatever

1 you were involved in on that occasion, you were not delivering
2 arms at Mr Taylor's instruction to the RUF. Do you follow me?

3 A. You can find it out that during my days of the ULIMO-J,
4 ULIMO, I never had a car belonging to me and this uniform, you
11:18:20 5 can find out which one of the uniforms the SOD was using and who
6 brought them in the country. You can check that out.

7 Q. Now on that day, 30 July, when you were shown these
8 photographs - Madam Court Manager, we can put the photographs
9 away, please, MFI-3 A and B. Can we put the schedule on the
11:18:49 10 screen, please. That document, yes, thank you. So that took
11 place on 30 July.

12 What we know when we go to page 115 of the bundle is - so
13 this is some 10 days or so after that meeting. 155 of the
14 bundle. On 9 August you were given 300 United States dollars and
11:19:34 15 that was an emergency payment for temporary relocation of family
16 members. Then on 19 September you were given a further 100 US
17 dollars for transport and assisting in locating witnesses for
18 WMU. Then on 24 September you were given a further \$100, US
19 dollars, for transport and lost wages. Then finally on 12
11:20:16 20 October you were given a further 215 US dollars, payment to
21 assist in the relocation of his family.

22 JUDGE DOHERTY: Mr Griffiths, I don't intend to interrupt
23 your cross-examination, but it appears that my bundle has a
24 completely different 155 and 154 to the others. Perhaps in the
11:20:46 25 break you could arrange to have a proper copy.

26 MR GRIFFITHS: I apologise for that, your Honour. I will
27 get that sorted out in due course.

28 Q. So that between the beginning of August and the beginning
29 of October you received some 500 US dollars. What was all that

1 money for?

2 A. 500 US dollars was given to me with - for me to take two
3 persons to Foya to be able to identify Johnny Paul - the area
4 where Johnny Paul was, because there were claims that Johnny Paul
11:21:49 5 died between Sierra Leone and Liberia, behind Foya. That was for
6 a two weeks trip.

7 Q. And that was all the money was for, was it?

8 A. Yes. I did not hail from that area, it was not my mother
9 land, so if I visited that area I needed a car to be hired to
11:22:20 10 take us to the area and we needed food to eat, we needed water to
11 drink. So that was not my area. It was given to us for those
12 reasons.

13 Q. In fact my calculations were wrong. When one totals up the
14 sums that you were given on those four occasions between 9 August
11:22:41 15 and 12 October it comes to 715 US dollars. That's a lot of money
16 by Liberian standards, isn't it, Mr Sheriff?

17 A. I never signed for \$700 anywhere. I never signed for
18 anything like \$700 anywhere. Even the 500 that you've spoken
19 about, I don't think it is in fact correct.

11:23:09 20 Q. What I'm saying is that over that two and a bit month
21 period you received a total of 715 US dollars. That's a lot of
22 money by Liberian standards, isn't it, Mr Sheriff?

23 A. It's not so.

24 Q. Is it a lot of money; yes or no?

11:23:37 25 A. It was not plenty for the job I was doing.

26 Q. Mr Sheriff, let me ask you bluntly: Are you giving evidence
27 for the money?

28 A. No.

29 Q. Very well. We'll come back to the payments. But in any

1 event if we go now, please, to page 95 in that bundle. I'm
2 hopeful that we can deal with this interview quite shortly. This
3 was a further interview conducted with you over two days on 10
4 and 13 November 2006. Present was Alain Werner who appears today
11:25:05 5 for the Prosecution and a Janet Tommy. Now you were asked
6 various details at the commencement of this interview about your
7 involvement with ULIMO and I have asked you about that before and
8 I do not intend to go over that area again, but could we pick up
9 this interview, please, on page 97 in the penultimate paragraph,
11:25:58 10 the second to last paragraph on that page. Do you see:

11 "The LURD was a rebel movement active after the election of
12 Taylor as president in 1997. Jomandeh Kamara was the leader of
13 the LURD for two months since its creation in 1999-2000. Then
14 Shekou Conneh", S-H-E-K-U K-O-N-N-E-H, "took over from Jomandeh
11:26:45 15 Kamara and is the leader of the LURD until today. Mosquito Spray
16 was with the LURD until 2003. He was initially the spokesperson
17 of the LURD and then was a senior LURD commander. His real name
18 is Facian Jakateh", F-A-C-I-A-N J-A-K-A-T-E-H, "and he was given
19 this nickname because he wanted to get rid of the two existing
11:27:31 20 Mosquito; RUF Sam Bockarie and former NPFL Christopher Varmoh."

21 Over the page, please.

22 "There were about 50 per cent of Mandingos in the LURD and
23 both former ULIMO-K and ULIMO-J fighters in its ranks but with a
24 majority of ULIMO-K fighters."

11:28:17 25 Pause there. Do you agree with all of that?

26 A. Yes.

27 Q. "The first base captured by the LURD in Lofa County was in
28 Voinjama. From 2001 the LURD had complete control of Voinjama
29 until 2003. The LURD occupied Kolahun from 2001, including

1 Fassama which was occupied in 2001. The LURD occupied also
2 Zorzor in 2002. Voinjama, Kolahun and Zorzor were the three
3 permanent bases of the LURD in 2001-2003."

4 Pause there again, please. Is it the case that LURD
11:29:32 5 effectively during those - that period of time, for that two year
6 period, were in control of that part of Liberia?

7 A. Yes.

8 Q. So as with that period when ULIMO had control of the Sierra
9 Leonean border, LURD during this period were effectively a buffer
11:30:10 10 between Liberian forces and the RUF, weren't they?

11 A. No, I did not understand that question.

12 Q. Do you recall that earlier when we were asking about
13 ULIMO's occupation of all of Liberia bordering Sierra Leone - do
14 you remember we talked about that last week?

11:30:41 15 A. Yes.

16 Q. Effectively ULIMO stood between the RUF and Liberian
17 government forces?

18 A. Liberian government forces?

19 THE INTERPRETER: The NPFL.

11:31:01 20 THE WITNESS: Thank you, yeah.

21 MR GRIFFITHS:

22 Q. Now during this period you're talking about on this page,
23 LURD was in the same position, weren't they? They were in
24 between the RUF and Liberian government forces, weren't they?

11:31:23 25 A. LURD further advanced and left some - you left some places
26 out. Before 2003 LURD finally controlled Foya and further
27 advanced Bopolu, they took over Bopolu, they took over Bomi
28 County, Tubmanburg, they overtook Grant Cape Mount and they
29 entered into Monrovia as far as Freeport.

1 Q. Which is why I'm asking the question, you see. So
2 effectively they controlled all of Liberia bordering Sierra
3 Leone?

4 A. Yes.

11:32:21 5 Q. Very well, let's continue, third paragraph on that page:

6 "Foya was controlled by Taylor forces, AFL and later
7 pro-Taylor militias from 1997 to 2003. When the announcement was
8 made that Taylor was leaving Liberia in 2003, a message was sent
9 for the Taylor forces in Foya to retreat. It was so important
10 for Taylor to keep control of Foya as it was the border town with
11 Sierra Leone."

12 Now can we go on to the next paragraph, please, and I want
13 to ask you some questions about this:

14 "When the LURD started its operation in 1999 the Guinean
11:33:37 15 government did not know about the LURD and did not finance it."

16 Is that true?

17 A. That is true.

18 Q. "The first attack was launched from Koindu in Sierra Leone
19 against Foya and Kolahun. The second attack launched by the LURD
11:34:08 20 was against Kolahun and Voinjama. The third attack by the LURD
21 was launched against Voinjama. There were about two weeks
22 between the three attacks. LURD attacked from Guinea but through
23 Sierra Leone by bypassing Koindu. They came through Sierra Leone
24 because they did not want it to be known that they came from
11:34:47 25 Guinea. However, the third attack was launched from Macenta in
26 Guinea straight against Voinjama. After these attacks Taylor's
27 forces in Lofa County started organising themselves. That is the
28 time when they contacted the RUF to come for military assistance
29 in Lofa County."

1 Pause there. So you agree, do you, that there was a degree
2 of cooperation between the RUF and Liberian government forces in
3 order to repel the invasion of Liberia by LURD?

4 A. Yes.

11:35:51 5 Q. Can we jump to the last paragraph on that page, please.

6 "The LURD had massive support from" - that should be the
7 Guinean government - "after the attacks in 2000 on the four
8 fronts. After these attacks the Guinean government was massively
9 backing the LURD. Until the four fronts attack the Guinean
10 government was not backing the LURD."

11:36:36

11 Is that true in terms of Guinean support?

12 A. I do not understand that area of your explanation. What I
13 said in that - the first and the second attacks, Guinean
14 government was not supporting LURD. But after the first and
15 second attacks when the Taylor forces - Mr Taylor's forces
16 started mobilising and attacking Gueckedou, attacking Macenta,
17 giving instruction to RUF in Sierra Leone territories to cross
18 from Sierra Leone to attack Guinea the Guinean government then
19 decided to support LURD against the Liberian government.

11:37:03

20 Q. Did not the Guinean government support LURD from the
21 outset?

22 A. They did not support LURD from the beginning.

23 Q. I hear your answer. Could we turn over the page to page
24 99, please, 00027837 at the top, the second paragraph on that
25 page. Do you have the page, Mr Sheriff?

11:37:59

26 A. I am having the page.

27 Q. I want to ask you about the second paragraph. "During
28 Taylor's presidency the only active battle field in Liberia and
29 military concern for Taylor in Liberia was in Lofa County." Is

1 that true?

2 A. Yes.

3 Q. Now that interview, as we know, was on 10 and 13 November
4 2006. Now following that interview if we go back to our
11:39:16 5 schedule, please, we see that - this is at page 156, your Honours
6 - on Sunday November 26 you receive 50 US dollars and it states
7 here that you received that for source development. Page 156.
8 What is source development?

9 A. That question is not supposed to be for me. The people
11:40:26 10 that had the communications together, they are supposed to answer
11 that question, what do they mean by source development.

12 Q. The reason why I'm asking you is source development sounds
13 suspiciously like money being given to someone to encourage
14 sources, sources of information. Now what I want to ask is were
11:40:51 15 you being given money to effectively bribe people to come
16 forward?

17 A. That is not true.

18 Q. Because you see you were given 50 US dollars for source
19 development on Sunday November 26. The very next day, on Monday
11:41:18 20 the 27th, you were given a further 300 US dollars for source
21 development. Why did you need 350 US dollars during the course
22 of a couple of days for source development? Can you help us?

23 A. What happened, I did not give no source development besides
24 the interview they had with me. Besides that if they needed
11:41:51 25 somebody and that person is in Maryland and they wanted me to get
26 that person, if I am able I will say okay, I will hire a taxi or
27 a pick-up and to go to that direction to get that individual and
28 come with that person. What you call source development, it was
29 not me that I heard it in the communication together. The person

1 who wrote it, what the money was given for, they can answer that.

2 Q. Well, the reason I ask, you see, is when we look at page
3 157 at the top of which reference is made to that 300 US dollars,
4 immediately below that we see that on November 29 you were given
11:42:39 5 50 US dollars for transport, lost wages and meals. So whoever
6 was compiling this schedule was setting out what the money was
7 being given for. Consequently when we see that on 26 and 27 you
8 had been given 350 US dollars for source development it was
9 certainly not for you to travel to see people. So help us,
11:43:14 10 please, what was that money used for?

11 A. That money was given to me purposely to go to Nimba County
12 to most - to most of the troubled areas. That place is very
13 dangerous to go and get Zigzag Mazhar to bring Zigzag Mazhar.

14 PRESIDING JUDGE: Mr Interpreter, was that Zigzag Mazhar?

11:43:54 15 THE INTERPRETER: Yes.

16 MR GRIFFITHS:

17 Q. Now we come to perhaps the most important set of interviews
18 conducted with you. Can we turn now, please, to page 102. Now
19 what do you we know about this interview? We know that it was
11:44:46 20 conducted over 29, 30 November and 4 December, three days. Do
21 you agree? Page 102, please.

22 A. Please go on.

23 Q. This is an interview conducted with you in Monrovia,
24 Liberia on 29 and 30 November and 4 December 2006. That's right,
11:45:27 25 isn't it? That's right, isn't it?

26 A. It's right. It was purposefully for that Nimba trip.

27 Q. And so it was just about the Nimba trip?

28 A. Yes, to get Zigzag Mazhar, to hire a car and I used the car
29 for three days.

1 Q. Now present was a Chris --

2 PRESIDING JUDGE: Mr Griffiths, I'm not sure what the
3 witness was told, but it doesn't appear to answer what you're
4 asking. He seems to be alluding to a certain sum of money.

11:46:06 5 Perhaps you could ask your question again.

6 MR GRIFFITHS: Very well.

7 Q. What were you telling us about the purpose of this
8 interview?

9 A. Which interview?

11:46:26 10 Q. The interview in late November, early December 2006?

11 A. There were several interviews from 2005 to 2007. I cannot
12 remember some of the dates again, but I will tell you that some
13 of the monies that were given to me, the purposes for which those
14 monies were given to me are just the ones I am telling you about,
11:47:03 15 the trip to Nimba, the trip to Lofa and the interviews for myself
16 and also the trip to Bong Mines. Those were the monies that you
17 can see are located on that paper and that was the reason why
18 those monies were given to me; to hire cars so that I can find
19 ways to assist them to get those people for them.

11:47:28 20 Q. We'll come back to the payments in a moment. All I'm
21 asking you now is about the purpose of this interview. Did it
22 follow your trip to Nimba?

23 PRESIDING JUDGE: Mr Griffiths, what interview? Perhaps
24 you could draw the attention of the witness specifically to the
11:47:47 25 page number.

26 MR GRIFFITHS:

27 Q. Do you have page 102 in front of you?

28 A. I am looking at the interview. That was why I said that I
29 had several interviews since 2005 up to 2007.

1 Q. You can see at the top of this page that this is an
2 interview dated 29 and 30 November and 4 December. My question
3 is was that interview after your trip to Nimba?

4 A. No. What I know, in 2006 from July to December I had trips
11:48:35 5 to Bong Mine, I had a trip to Nimba, I had a trip to Lofa. It
6 was in the same 2006.

7 Q. Very well. I'm not going to delay over that. Do you
8 agree, bearing in mind that this is November 2006, that this
9 would be some 21 months after your first interview?

11:49:13 10 A. I did not get that question correct.

11 Q. Bearing in mind that your first interview was on 23
12 February 2005, this interview on 29 and 30 November and 4
13 December 2006 would be some 21 months after you'd been first
14 interviewed. Would you agree?

11:49:43 15 A. Yes.

16 Q. Now the reason why I want to underline that fact is this:
17 When we now turn to page 106 we see this at the top of the page:

18 "When the witness and his three bodyguards drove into
19 Kailahun Town" - I pause to mention you're describing the trip to
11:50:17 20 get Sam Bockarie - "they saw that there was something going on.
21 There was a group of 20 to 30 armed RUF gathering and the witness
22 saw a man in uniform talking to the soldiers. The witness
23 inquired with the RUF soldiers as to where Sam Bockarie was and
24 they pointed out the man talking to the soldiers as being Sam
11:50:46 25 Bockarie. The witness gave to one of the RUF soldiers a message
26 to bring to Sam Bockarie. The message was that SSS people sent
27 by Charles Taylor were there to see him.

28 Shortly after that the witness and his bodyguards saw at
29 least 10 people or so with their arms tied behind their back

1 being brought to Sam Bockarie. They were brought in front of a
2 small building that was on the road that leads south from the
3 main junction and is past where the present police station is.
4 The witness saw Sam Bockarie who was talking to the prisoners in
11:51:55 5 Krio. He was dressed in military uniform and had apparently just
6 came from Freetown.

7 The witness and his bodyguards could not hear what Sam
8 Bockarie said, but he was shouting at the prisoners. The witness
9 then saw Sam Bockarie shooting them with a pistol in the head one
11:52:31 10 after the other."

11 Question now, please, Mr Sheriff: Why did it take you 21
12 months to remember to tell the OTP about that incident?

13 A. Was this compulsory to me?

14 Q. Well, you see, you had purported to tell them the truth
11:53:01 15 about your visit to collect Sam Bockarie in February 2005, yet
16 you had failed to mention this fact. Now what I want you to help
17 us with is why did it take you so long to remember?

18 A. I did not forget. The first interview I had with the
19 people I never had trust in the people hundred per cent. That
11:53:35 20 was what I said. This interview, sometimes they would call me
21 and I would just give them short stories and I would leave some
22 out, the reason being that because if I had not done anything
23 about that it was going to be a threat on my life, if I gave all
24 the information. But after which when I came to realise that
11:53:59 25 they needed nothing else, they only needed the truth from me,
26 that was the time I started giving them the entire story. I
27 explained this on Friday, it explained it on Thursday.

28 Q. So are we to understand then that when you first spoke to
29 the OTP you were tailoring your account because of your mistrust

1 of them?

2 A. Due to the information Roland Duoh was giving to us. We
3 were misled.

11:54:40

4 Q. Were you tailoring your account? Were you changing the
5 facts because you distrusted them?

6 A. I was not changing the truth. Roland Duoh misled everybody
7 in Monrovia. So others were running away from the city and that
8 they would be arrested and put in jail in Freetown if you
9 appeared in front of these people.

11:55:02

10 Q. But the point is, Mr Sheriff, since that first interview in
11 February 2005 when you failed to mention this fact you had been
12 seen by the OTP and interviewed on three further occasions. So
13 help us, why did you wait until November 2006 to mention this
14 important fact?

11:55:42

15 A. Some of the parts I left out were even more than that you
16 are reporting about. I am saying these things I'm saying, I was
17 not under duress to say them, it was out of my personal volition.
18 If I was pleased to talk to them I talked to them freely, they
19 asked for my willingness, so I can say I was not forced.

11:56:07

20 Q. Very well. In order to test your question - your answer,
21 do you recall telling us last week that it was five people that
22 were executed by Sam Bockarie?

23 A. I said five people were executed.

24 Q. Why does it say 10 on this page?

11:56:37

25 A. Ten were brought outside. Ten were brought outside and
26 after that he said, "Okay, the remaining people, before I come
27 back, I don't want to see any of them, they should all die."

28 Q. Just look at the page carefully, second paragraph: "At
29 least 10 people or so with their arms tied behind their back

1 being brought to Sam Bockarie."

2 Go to the next paragraph: "The witness then saw Sam
3 Bockarie shooting them with a pistol in the head. He shot all of
4 the people that were there with their hands tied behind their
11:57:25 5 back." That means he shot 10 of them. Was it 10 or was it five?

6 A. They were five.

7 Q. Why did you tell them 10?

8 A. I didn't tell them about 10. I said he was shooting at
9 them one after the other. I said he was shooting at them one
11:57:49 10 after the other.

11 Q. Can you help us at all as to where they got that figure
12 from if it wasn't from you, the figure 10?

13 A. They brought 10 persons from out of the cell and he was
14 shooting at them one after the other and then he gave the
11:58:11 15 instruction that the remaining people, before he came back he
16 wouldn't want to see them, he said they must all die. He said
17 those who were outside and including those who were still inside
18 the cell house.

19 Q. But you accept, don't you, that at page 106 it does say:

11:58:32 20 "He shot all of the people that were there with their hands tied
21 behind their back." You agree it says that, don't you?

22 A. I stand to be corrected. I have said, what I explained, he
23 shot some of them and he gave instruction that before he came
24 back he wouldn't want to see the rest of them.

11:59:01 25 Q. Very well. I'm not going to delay further on that. Turn
26 to page 107, please, the second paragraph from the bottom of the
27 page. Now you're still talking about the Sam Bockarie trip.
28 Listen to this summary:

29 "One of the soldiers who was escorting the witness when

1 they took Sam Bockarie from Buedu through Lofa County told him
2 when they were on the way that Sam Bockarie was in possession of
3 diamonds and that he had seen them with Bockarie. This soldier
4 told the witness that they should kill Sam Bockarie, take the
12:00:10 5 diamonds and run away to Guinea.

6 Bockarie had 10 bodyguards with him but it would have been
7 easy to kill all of them as they were in Lofa County in former
8 ULIMO-K territory. The witness did not agree to kill Sam
9 Bockarie as he had his family in Monrovia and knew that Taylor
12:00:42 10 would have killed his family.

11 The nickname of the soldier who proposed to kill Bockarie
12 was Master General and he later fought alongside with the LURD.
13 This happened as they were passing through Voinjama. Master
14 General saw the diamonds when Sam Bockarie was taking his clothes
12:01:18 15 off before his hair cut in Sierra Leone. It was a small
16 mayonnaise jar that was full of diamonds. The witness did not
17 see any money or bag containing money with Bockarie as they were
18 travelling."

19 Pause there. This is the very first time, 21 months after
12:01:58 20 this first interview, when you mention a mayonnaise jar of
21 diamonds. Do you agree?

22 A. What I said --

23 Q. Let's not take over long on this. Do you agree this is the
24 first time you ever mentioned a mayonnaise jar of diamonds to the
12:02:24 25 investigators?

26 A. It was not the first time.

27 Q. Can you help us as to why there is no prior record of you
28 having mentioned this before?

29 A. I mentioned it several times. People interviewed more than

1 15 different peoples and they all announce what I have said.

2 When Sam Bockarie arrived at Voijnjama he asked to go and take

3 bath --

4 Q. You've told us that, Mr Sherif, and I don't want you to
12:03:02 5 repeat it. My question is very simple: Why did it take you 21
6 months to mention it?

7 A. That is why I said the information I was giving to the
8 people was not forced on me.

9 Q. Why did it take you 21 months to mention it?

12:03:26 10 A. I think I have answered you. I have said it. I was not
11 forced and I was not giving the information all in one day.

12 Q. Very well. Now help us with this as well. Look again at
13 that paragraph, please. Do you notice four lines from the bottom
14 of the paragraph - let me read it carefully so that you

12:03:59 15 understand. Remember earlier in the paragraph you're talking
16 about this man telling you about the diamonds, then four lines
17 from the bottom you say this:

18 "Master General saw the diamonds when Sam Bockarie was
19 taking his clothes off before getting his hair cut in Sierra
12:04:32 20 Leone. It was a small mayonnaise jar that was full of diamonds."

21 Help us with this, Mr Sherif, why does that sentence not
22 read, "I, Sherif, saw the bottle of diamonds"? Why doesn't it
23 say that?

24 A. That is why I said the people that were writing these
12:04:54 25 information did not write everything down correctly and also most
26 of the information I gave, they did not put all on paper. The
27 minister, the former minister of Tejan Kabbah's government, Sam
28 Bockarie, wanted to execute him in Voijnjama. I appealed to him
29 not to kill him. That also is not mentioned. That is why I said

1 everything was not written. Some is there, some are not there.
2 That is why I said what we see is what we're talking about. What
3 happened, happened in Voinjama.

12:05:39 4 Q. Mr Sheriff, simple question: Why does it not read, "I saw
5 the mayonnaise jar of diamonds"? Why doesn't it say that?

6 A. If I stand to be corrected, that is what I am saying. The
7 person who took the information from me - both me and Master
8 General saw the diamond with Sam Bockarie when he was taking his
9 jacket off.

12:06:05 10 Q. But why doesn't it say, "Master General and I saw the
11 diamonds"? Why doesn't it say that?

12 A. That question should go to the person who was doing the
13 writing.

14 Q. So once again whoever was doing the writing has recorded it
12:06:27 15 wrongly; is that right?

16 A. No, they did not understand the Liberian Local English.
17 Some of them are white people, they came from Canada and
18 elsewhere. When you are talking they were not getting you
19 correctly. Maybe that was the reason why were some were not
12:06:44 20 written down correctly and some of the information I expect to be
21 here, the execution of the former minister in Voinjama, Tejan's
22 Kabbah's government, when I did appeal to Sam Bockarie did not
23 appear here.

24 Q. Wasn't there an interpreter present?

12:06:58 25 A. They had someone interpreting in Krio. They did not have
26 anyone interpreting in Liberian Local English.

27 Q. But in any event what we know is that this is the first
28 occasion when you make reference to diamonds and what I'm going
29 to suggest, Mr Sheriff, is in perhaps the off the record

1 conversations you were having you were told what the
2 investigators wanted. They wanted evidence about blood diamonds
3 and you eventually, 21 months down the line, to give them what
4 they wanted, if there was something in it for you. Isn't that
5 the case?

12:07:57

6 A. That is not true.

7 Q. Because let's see what happens. Having looked at the
8 pattern of payments to you up to this point, let's look what
9 happens the minute you mention diamonds. Can we go back to the
10 schedule, please. This is at page - can we have the schedule up
11 on the screen, please. Yes, let's see what happens.

12:08:16

12 Now we know that interview is on 29 November, 30 November
13 and 4 December. I have already mentioned that on 27 November you
14 were given 300 US dollars for source development. On the first
15 day that you were interviewed you were given a further 50 US
16 dollars for transport and lost wages. On the second day of the
17 interview, 30 November 2006, you were given 125 US dollars. Then
18 on 1 December you were given a further 50 US dollars. On the
19 final day of the interview, 4 December, you were given 15 US
20 dollars and then thereafter we see that following 4 December when
21 you finally tell them about diamonds, just turn over to the
22 second page of the schedule, please, from December right through
23 to July constant payments are being made to you and yet you're
24 not being interviewed.

12:08:58

12:09:39

25 So we have a payment on 25 January of 50 US dollars. Then
26 on 27 January, 100 US dollars. Then on 21 February, 5 US
27 dollars. Then on 25 February, 100 US dollars. On 7 March, 100
28 US dollars. On 28 March, 160 US dollars. On 2 April, 90,000 in
29 local currency. Then on the same day, 2 April, 100,000 in local

12:10:19

1 currency. Then on 3 April, 88,000 in local currency. On the
2 same day a further 50 in local currency. Then on 4 April 20 - it
3 doesn't say, but I presume it's US dollars. Then 21 April,
4 20,000 in local currency. Then on 30 April a further 20,000 in
12:11:55 5 local currency. Then on 29 June a further 146,000 in local
6 currency. Then on 12 July, 30,000 in local currency. And during
7 that whole period not a single interview. You're in it for the
8 money, aren't you, Mr Sheriff?

9 A. I do not have any record about all these.

12:12:40 10 Q. Mr Sheriff, what I'm suggesting, and I want you to be quite
11 clear about it, once you mentioned diamonds the money started
12 coming in and that's what you wanted, wasn't it?

13 A. That is not true.

14 Q. Can you explain then how it was that immediately following
12:13:06 15 the mention of diamonds you're getting all this money and you're
16 not being interviewed once? What's the money for?

17 A. Some of the days mentioned just now, I left for Monrovia
18 with my family to be relocated when my family was under threat, 1
19 April 2007. From that time to present my allowance has been
12:13:48 20 given to me at the area I was. So you mentioned all that.

21 So what do you expect when I leave from my country where I
22 was working - when I was working with Mr Taylor, the money that
23 he used to give to me, can you compare to that to this when he
24 used to give me 20,000 just to go on a small job I was doing in
12:14:07 25 Lofa, 20,000 United States dollars. He gave it to me and he gave
26 me 10,000, he gave me 5,000, more than threefold. So what is
27 this? This is if I had been paid for hours, not paid - the job I
28 was doing in Monrovia was more satisfactory.

29 Q. Let's have a look in more detail, shall we, as to what you

1 were being given this money for. Can we start again at page 157,
2 please. On 29 November the 50 US dollars given to you was for
3 transport, lost wages and meals. Do you see that?

4 A. I see it.

12:15:09 5 Q. On 30 November you are given 125 US dollars to enable
6 witness to communicate with members of the OTP. What did you
7 spend that money on?

8 A. That money I went to Bong Mines for four days. I went to
9 Bong Mines to locate someone they had wanted for me to locate for
10 them.

11 Q. Look at what it says. "To communicate with members of the
12 OTP." What did you need the money for?

13 A. It's to - it was for me to hire a vehicle that was used.
14 To hire a vehicle by day, 50 US dollar or 75 US dollar per day.

12:16:06 15 Q. I may have to ask somebody else about that. The next one,
16 Friday 1 December. The 50 US dollars is for transport and lost
17 wages and meals. Do you see that? Do you see it, Mr Sheriff?

18 A. I know when you say transport I will understand it. When
19 you say transport maybe it was given for me to locate somebody
12:16:31 20 from them and I was looking for somebody for them. If you hire a
21 car from Monrovia by day they would charge you 50 dollars or 75.
22 I made it clear to you by day.

23 Q. It sets out what the money is for, so when we go over the
24 page --

12:16:55 25 A. The money was for transportation.

26 Q. Not all of it wasn't. When we go to page 158 - turn over,
27 please. Mr Sheriff, you need to follow this in the bundle or you
28 might get confused. Could you turn, please, to page 158. Monday
29 4 December, 15 US dollars for lost wages. Then when we look at

1 the next one --

2 A. I think I am supposed to give you an answer one by one now.
3 That was meant for transportation, to hire transport from
4 Monrovia to locate somebody - if it's from central Monrovia it
12:18:02 5 will cost 50 or 75 dollars.

6 Q. So when we see at number 17 at the top of that page 15 US
7 dollars, that shouldn't say for lost wages, it should say for
8 transport?

9 A. You meant 15 US dollars, that was for the scratch card that
12:18:28 10 we will buy. Sometimes for the area that you will go to locate
11 the person, you will not find that person. You have to buy a
12 scratch card to have in your phone to make contact with the
13 person, or the people that do know the person, they will start
14 contacting them one by one. That was scratch cards money.

12:18:46 15 Q. Well, I won't delay on that. Because, you see, it would
16 appear from this document that we're looking at that whoever was
17 keeping records was being quite particular to note what the money
18 was being paid out for. Would you agree?

19 A. No, the way the money was given to me, I am now ready to
12:19:17 20 answer.

21 Q. Look at number 18. January 25 2007. Source locating
22 witness on behalf of investigations, funds to cover transport and
23 communication. You have been given 50 US dollars for that. Then
24 again on 27 January, searching for witnesses, transport,
12:19:45 25 communication and meals. February 21, top up card. But when we
26 go over the page, February 25, a hundred US dollars for family
27 assistance. What's that?

28 A. I did not ask - I did not ask for no family assistance.
29 When they talked about relocating my family I told them that they

1 do not have travelling document. So if they had it there, family
2 assistance is what's meant for that credential, that document
3 that would be used for Monrovia. They shouldn't have it there as
4 family assistance. It was not meant for family assistance.

12:20:36 5 Q. I'm sorry, but when we go to 23 there's a reference to
6 payment for travel documents. So this is quite separate. Why
7 were they providing you with assistance for your family? Help
8 us, please?

9 A. That is an error from them. Nobody gave me money as family
12:20:58 10 assistance. I did not ask for any family assistance. I was
11 working and I was working two places at the same time taking pay.
12 I worked at the DDR and was paid \$300 a month quite different
13 from the SS job I was doing.

14 Q. So once again the error is down to whoever created the
12:21:17 15 record, not you; is that right?

16 A. That is - that area - nobody gave me money for family
17 assistance. The purpose of the money given to me was - it has to
18 be spelt out.

19 Q. Because, you see, when we go to the bottom of the page, 24,
12:21:43 20 you see the reason for you being given 90,000 in local currency
21 was firstly for communication, secondly for meals, water. Then
22 when we go over the page to number 25 you are given 100,000 for
23 lunch and dinner provided to family. What was that about?

24 A. I think I can ask question about that because when my
12:22:18 25 family were relocated from Monrovia it was the sole
26 responsibility of the Special Court to feed them.

27 Q. And at 26 we see 88,000 in local currency for medical and
28 meals. What medical?

29 A. You see medical there. When someone gets sick --

1 Q. Page 160, number 26?

2 A. No cash money was ever given to us for medical treatment.
3 When we were sick they sent us to the nearby hospital to go and
4 receive treatment. Nobody gave us cash for medical treatment.

12:23:07 5 Q. Can you explain why at 26 it says 88,000 for medical and
6 meals? Can you help us?

7 A. What do you call meal?

8 Q. Well, that's normally when somebody sits down and eats
9 something?

12:23:28 10 A. They were responsible for our feeding and sometimes they
11 would bring some of the food or bring the item by themselves, or
12 sometimes if you are sick and they can take you to the nearby
13 hospital, they can - but nobody gave us money for medical.
14 Nobody gave us physical cash. Nobody put physical cash in our
12:23:52 15 hands for treatment. They usually take us to hospital. All the
16 time they are willing to respond whenever someone gets sick, a
17 member of the family, they would take that person to the
18 hospital. Maybe the money they were spending at the hospital,
19 maybe that's the amount they had on paper.

12:24:08 20 Q. Number 27 on the same page, payment made to witness for
21 food for one week, 50 in local currency. Were they supporting
22 you and your family?

23 A. They were feeding me and my family.

24 Q. Even though you were still working?

12:24:34 25 A. I never worked for them. I was not working for them.

26 Q. You were working for the Liberian government, weren't you?

27 A. No, the Liberian later had my pay stopped and the Special
28 Court asked Madam Ellen Johnson-Sirleaf to have my pay stopped
29 because they were taking full responsibility of my feeding. So

1 you can find that out.

12:25:22 2 Q. I see. So there came a time, did there, when effectively
3 the Office of the Prosecutor was supporting you because you
4 weren't being paid by the Johnson-Sirleaf government. Is that
5 right?

6 A. I do not understand your question clearly.

7 Q. Did there come a time when you were totally dependent on
8 the Office of the Prosecutor to maintain yourself and your
9 family?

12:25:37 10 A. No, I was not totally dependent on them.

11 Q. Where were you getting an alternative income from?

12 A. DDDR, I was taking \$300 per month.

13 Q. I'm sorry, I missed that. Could you repeat that answer,
14 please?

12:26:00 15 A. Disarmament, Demobilisation, Rehabilitation and
16 Reintegration Commission. I was working there from 2003 up to
17 now. So I was still getting my pay from there.

18 Q. So you were no longer employed in the SSS?

19 A. I am employed in the SSS but not taking pay.

12:26:44 20 Q. Then if we look further on that page, because I don't want
21 to delay overlong on this, page 160. We see on 4 April you are
22 given 20 and it doesn't state whether it's US dollars or local
23 currency, but the reason given, "Payment made to witness for the
24 purchase of one Comium SIM card and credit card."

12:27:16 25 A. They did not give me no cash money. They gave me phone and
26 I asked for phone to communicate with my external family. If I
27 had problem people I would call - that were caused by the Special
28 Court people, if I had problems, so they gave me mobile to
29 communicate. Nobody gave me physical cash money. Maybe that's

1 the amount that they used to buy the phone.

2 Q. Could you go over the page to 161, please, and I just want
3 to select a couple more of these payments made to you in the hope
4 that you can assist us as to what they were for. At the top of
12:28:26 5 page 161, 20,000 in local currency allegedly given to you and the
6 reason is given as, "Source provided with funds in order to
7 obtain information for us." What was that about?

8 A. The person, the money that was given to me to buy phone or
9 gave me phone to communicate with them, the way they spelt it out
12:29:09 10 is how to understand it. That's how they have it. But what I do
11 know, communication was provided for me.

12 Q. Were you ever given money in order to obtain witnesses for
13 the Office of the Prosecution?

14 A. No.

12:29:27 15 Q. Very well. Then one of these payments - go over the page,
16 please, to page 162. On Tuesday 17 July you were given 5,000 in
17 local currency and the reason given is Prosecution prepping. Now
18 in July of 2000 you met with lawyers from the OTP, did you not?

19 A. I met with them from 2005 up to 2007. I can't recall some
12:30:30 20 of the dates again.

21 Q. Well, let me try and help you, shall I. If we turn to page
22 115 in the bundle, and this is the date to which that entry in
23 the schedule at the back of the bundle refers, on 16 and 17 July
24 2007 you were taken to a witness prep - preparation - room.

12:31:12 25 Present was Brenda Hollis who prosecutes in this case and Joseph
26 Saffa. Now we know from the entry on the 27th that you were
27 there to be prepped for trial. Help us, please, Mr Sheriff. What
28 did that preparation involve?

29 A. I don't know what you are referring to, prep. I don't know

1 the meaning of that.

2 Q. Help us. You spent two days being prepared by my learned
3 friend who prosecutes in this case and I want to know what that
4 preparation involved. Help us?

12:32:15 5 A. I think it could be clear to me if you explain what the
6 preparation is that you are talking about.

7 Q. I don't know what it is. That's why I'm asking. I want to
8 know what was being said to you and what were you saying to
9 Ms Hollis during those two days when you were being prepared.

12:32:42 10 It's a concept I don't understand. That's why I want your help.
11 What was being done?

12 A. The only thing, sometimes some of the statements that she
13 had at hand, she was never the one that interviewed me in
14 Liberia, she only met me in Sierra Leone, and sometimes some of
15 the place names that she was confused about that she did not
16 understand she would call my attention and ask me question on
17 that area. That happened, yes.

18 Q. Were you told what you might be asked questions about?

19 A. No. The only thing she told me was that I should just
12:33:33 20 explain what I knew and what was the truth and nothing but the
21 truth.

22 Q. And help us with this. If we turn, please, to page 119,
23 during this preparation, second to last paragraph on that page:

24 "In 1998 at Voinjama, Liberia while escorting Sam Bockarie
12:34:23 25 to Monrovia the witness saw Sam Bockarie take a jar full of
26 diamonds from his jacket pocket. These diamonds were taken to
27 Charles Taylor."

28 This is the very first time that you ever mention to anyone
29 that you saw a mayonnaise jar full of diamonds. How did that

1 come about?

12:35:22 2 A. This was not my first time. Remember you asked me some
3 questions that some of the times that they wanted to ask you, you
4 said they put off record. When I started explaining my stories,
5 when I see them writing I would tell them no, and if they
6 continued writing then I would go out. So I could have explained
7 off record, but I don't want to say that I saw somebody with
8 cameras or somebody was taping or somebody was recording what I
9 was saying. So I was not entrusting - entrusted. So from the
12:35:44 10 start it was difficult to get information from me and there were
11 times that I would explain and nobody would write it.

12 Q. Can you help us as to why it is that on the previous
13 occasion in late November 2006 you speak of Master General seeing
14 the diamonds and then curiously it's not until eight months later
12:36:17 15 when you're being prepared to give evidence that all of a sudden,
16 like on the road to Damascus, you suddenly see the light and
17 mention seeing a jar full of diamonds. How do you explain that,
18 Mr Sheriff?

19 A. This is not true, you are explaining. What I have said to
12:36:45 20 you is that from the start when the Special Court started
21 interviewing me I used to tell them that I would give them some
22 information and I would tell them that they should stop writing
23 and that if they continued writing I will walk out. And they
24 will not take note of such information and for anything I would
12:37:10 25 want them to write, when they put it on paper I will sign. Some
26 of the information I gave to them I will tell them, no, I want
27 this to be off records and if they wrote them on paper I would
28 tell them that I would not continue to give the information. But
29 we started it from the start. I explained so many things but not

1 all of them were on documents.

2 At the earliest part when Roland Duoh and NPFL supporters
3 had created fear into everybody in Monrovia and that people were
4 here from the Special Court of Sierra Leone and that all those
12:37:50 5 people who will go there to explain something about Mr Taylor,
6 they will all be arrested and taken to jail in Freetown and that
7 they wanted to see to it that those who were involved let justice
8 be done to everybody.

9 Q. I'm going to move on from that. Can we go to page 121 of
12:38:17 10 that same interview, please. Last paragraph on that page:

11 "Taylor went to Guinea in 1998 to meet with the President
12 of Guinea, Conteh and with Kabbah, the President of Sierra Leone.
13 Taylor told Kabbah he was not supporting the RUF. Taylor told
14 President Conteh that he understood the people were organising in
12:39:11 15 Guinea to attack him in Liberia. President Conteh told him this
16 was not true."

17 Pause there. LURD were indeed organising in Guinea,
18 weren't they?

19 A. President Taylor asked that question.

12:39:34 20 Q. LURD were indeed organising in Guinea, weren't they?

21 A. Yes.

22 Q. Thank you.

23 "Yet President Conteh told him this was not true. After
24 that trip and unknown to Conteh fighters who became the LURD did
12:39:56 25 organise in Guinea around the Macenta area close to the border
26 with Lofa County. These fighters are attacked the Voinjama area
27 in 1999 and then retreated back to Guinea. Taylor complained to
28 Conteh, but Conteh denied that such attack took place from
29 Guinea.

1 In that same year a second attack was launched against Lofa
2 County from Guinea through the area of Koindu, Sierra Leone.
3 Taylor again complained to Conteh. Conteh responded that the
4 attack came from Sierra Leone, not from Guinea. These two
12:40:55 5 attacks and Conteh's denial that they were launched from Guinea
6 led Taylor to attack Guinea in 2000, first against Pamelap and
7 then later against Gueckedou."

8 You go on to mention that the RUF participate in those
9 attacks as well. Pause there. Were you present when these
12:41:29 10 conversations took place between President Taylor and President
11 Conteh?

12 A. I said when they first met a close range bodyguard was
13 there when they were discussing and later Conteh left the meeting
14 with the rest of his bodyguards and Mr Taylor and Kabbah went in
12:42:01 15 to have a closed door meeting. That happened in Guinea.

16 Q. Mr Sheriff, I suggest that is a lie, that in meetings
17 between heads of state there are no bodyguards present. That's
18 right, isn't it?

19 A. Not in all cases.

12:42:27 20 Q. You see, what I'm suggesting is that you're trying to paint
21 a picture of you being so close to President Taylor in order to
22 enhance your evidence. Do you understand what I mean by that?

23 A. I was close to him. That is the reason why amongst all the
24 fighters he depended on, the most trustful person that he invited
12:43:01 25 to Kalaba was Roland Duoh and myself, the reason being that I was
26 a person that he had confidence in him and defended him whilst he
27 was in Monrovia and that was why in fact when he went to Kalaba
28 he communicated with us. If not he wouldn't have communicated
29 with anybody from Kalaba. But when he went to Kalaba he managed

1 to invite Roland Duoh and myself to Kalaba. If I was not a
2 trustful person to him and if I had not been closer to him would
3 he have done that?

4 Q. Well, I hope you understand my suggestion.

12:43:40 5 A. I was a close person to him.

6 Q. Then can we put the schedule back up on the screen, please.
7 Following that interview on 16 and 17 July 2007 we know that on
8 both those dates you were provided with money. I'm looking at
9 page 162, your Honours. You were provided with - well, meals
10 were provided during the interview and we see that for the 17th
11 it's noted that the payments were for Prosecution prepping. Do
12 you see that?

13 A. I am seeing it. I am seeing the document on the screen.

14 Q. Then the final two payments that were made to you were on 2
12:44:59 15 August and 30 August respectively. In respect of the former date
16 no reason is given as to why you were given 20,000 in local
17 currency?

18 PRESIDING JUDGE: Court manager, the relevant page on the
19 screen should be page 162, and before the witness as well.

12:45:55 20 Mr Griffiths, perhaps you could redirect your question, please.

21 MR GRIFFITHS: Very well.

22 Q. Page 162, please, Mr Sheriff. You will see two further
23 payments made to you of which we have had disclosure. The first
24 on 2 August gives no reason as to why you were paid 20,000 in
12:46:19 25 local currency. Can you assist us as to why you received that
26 money in August of last year?

27 A. I cannot help because myself, I did not see or what the
28 money was given to me for or its purpose. And nobody gave me a
29 local currencies other than payments that I do receive. Let me

1 make it clear. All the amounts in local currencies, I am just
2 seeing them. Every payment that were made to me was in United
3 States dollars in Liberia. No amounts were given to me in local
4 currencies.

12:47:06 5 Q. Very well. Now there's just a couple more interviews that
6 I want to deal with and I'm hopeful that I can complete at least
7 one of them before the luncheon adjournment. Could you turn,
8 please, to page 124. Now this is, as stated at the top of the
9 page, a clarification interview where you were present at the
10 Great Wall in Monrovia. It took place on 6 August, I take that
11 to be 2007, and present apart from yourself was a David
12 Cunningham and a Joseph Sesay of the OTP.

13 Now there is one matter that I want to ask you about in
14 relation to this interview and it's on the following page, page
12:48:27 15 125, reference at the top 00021925, the second to last paragraph
16 on that page:

17 "The conversation regarding the diamonds was clarified to
18 be incorrect. VS had nothing to do with diamonds. CT", I take
19 to be Charles Taylor, "was saying that SB", I take to be Sam
12:49:09 20 Bockarie, "presently had money to buy the arms from the fighters
21 who had not previously turned them in."

22 Pause there. Now what part of the conversation regarding
23 the diamonds was clarified to be incorrect?

24 A. The correct one, as I explained to you, was that this
12:49:41 25 diamond issue to see a diamond with Sam Bockarie took place at
26 Voinjama. And I also said that at no time did Mr Taylor and
27 myself ever discuss on diamond issue, or ever gave instruction on
28 diamond issue, or did I see him and Sam Bockarie discussing on
29 diamond. I said it was when I was taking Sam Bockarie to him

1 that I saw diamond with Sam Bockarie.

2 Q. Now that's all I wanted to ask you about in that interview.

3 Could you turn to page 129, please?

4 A. Where?

12:50:30 5 Q. Page 129. This was an interview conducted with you over
6 four days in November 2007, on 7, 8, 14 and 19 November. Present
7 during those interviews over those four days was Joseph Saffa,
8 Magnus Lamin and Alain Werner and we can take most of this quite
9 quickly. Firstly you were shown a number of photographs and
10 asked to identify individuals. Do you recall that?

11 A. Yes.

12 Q. And so we can skip the next three pages and go to page 133.

13 You were then asked about a number of names, last line on page

14 133. I am not going to go through those names. I just want to

12:52:09 15 remind you of the context.

16 Then when we go to page 139, in the middle of that page,
17 having been asked about photographs and individuals the witness
18 then gave the following additional information. Now the part of
19 this additional information I want to ask you about, in light of
12:52:49 20 the testimony you have given us as to how close you were to
21 President Taylor - let's go to page 144, shall we. Paragraph 49:

22 "The witness, when he was working in the SSS as assistant
23 director for operations, could attend any meeting he wanted", but
24 this is the important part, "but he noticed that everything was
12:53:29 25 not always said in his presence as he was a former enemy."

26 You were not an insider, were you?

27 A. I was an insider.

28 Q. Why were you telling the OTP then that in effect you were
29 being treated with suspicion because you were a former enemy?

1 A. We were having a meeting together and later sometimes
2 Mr Taylor will send for Benjamin Yeaten and have a secret meeting
3 or instruction. That is why I am saying that not in his
4 presence, but some of the key areas, anything relating to RUF
12:54:24 5 issue or Sam Bockarie, I am not part of that, because even though
6 I received instruction to get Sam Bockarie and to carry Sam
7 Bockarie later, when I was relieved - I been [indiscernible]
8 Benjamin Yeaten and Zigzag Mazhar started dealing with Sam
9 Bockarie, the reason was because I was not an NPFL member. The
12:54:48 10 reason was that for me to start the job, clear Lofa, at the
11 earlier part they couldn't use Lofa, and since I had done that
12 job my own side was finish and the remaining part was done by
13 Zigzag Mazhar and Benjamin Yeaten.

14 Q. Sorry, I'm not so sure you heard my question.

12:55:11 15 PRESIDING JUDGE: Mr Interpreter, really, make an effort to
16 make yourself understood. I don't know what language you are
17 interpreting into. You are supposed to interpret in English to
18 help us understand what the witness is saying, but sometimes the
19 language you speak I personally don't follow.

12:55:33 20 MR GRIFFITHS:

21 Q. Do you agree, Mr Sherif, looking at that passage to which I
22 have drawn your attention, that it was quite clear that when
23 certain matters were being discussed you were excluded from that
24 discussion quite deliberately?

12:56:00 25 A. I could be in the meeting, but for the reason that by
26 virtue of my position nobody would have asked me to move out.
27 But when they knew that I was present in the meeting and there
28 were certain things they never had wanted me to understand about
29 they would forget about that for that moment and later they would

1 meet with Mr Taylor and they would discuss it mouth to ear. And
2 when the directors were in the meeting and certain security
3 discussions in relation to the nation, by virtue of my position,
4 nobody stopped me by virtue of my position as assistant director
12:56:46 5 of operation. Is that clear now?

6 Q. Not really, but I will move on.

7 PRESIDING JUDGE: Mr Griffiths, we have only about two and
8 a half minutes to the end. So you decide a good time to stop.

9 MR GRIFFITHS: This is as good as any because my next
12:57:07 10 question requires me to refer him to a passage which will take
11 more than two minutes, your Honour.

12 PRESIDING JUDGE: Okay then. We will now break for lunch.
13 Mr Witness, as usual I caution you not to discuss your testimony
14 with anybody. We will resume at 2.30.

12:57:23 15 [Lunch break taken at 12.58 p.m.]

16 [Upon resuming at 2.30 p.m.]

17 PRESIDING JUDGE: Good afternoon. Mr Griffiths, do
18 continue with your cross-exam of this witness.

19 MR GRIFFITHS: Your Honour, can I indicate that I had left
14:27:45 20 on Her Honour Judge Doherty's desk some replacement pages for a
21 bundle which I have paginated and punched holes in and so you
22 should be able to replace them.

23 JUDGE DOHERTY: Thank you, Mr Griffiths. I have just
24 received them. I did pass through the originals for your
14:28:07 25 records. They will come to you in due course.

26 MR GRIFFITHS: I am grateful, your Honour.

27 Q. Now before we adjourned for lunch, Mr Sheriff, we were
28 talking about the series of interviews conducted with you over
29 four days between 7 November culminating on 19 November, and I

1 had drawn your attention - having explained to you that at the
2 beginning you were asked about photographs I had drawn your
3 attention to page 144 and a particular passage there. I now want
4 to move on and refer you to the only further passage that I want
14:29:02 5 to refer you to and that is on page 149, please. It is paragraph
6 69 on that page. Now, you will see that that paragraph - I will
7 wait until you find it?

8 A. 294?

9 Q. Page 149, paragraph 69, and there we see this:

14:29:55 10 "Concerning the jar of diamonds that the witness saw in
11 Voinjama with Sam Bockarie, the witness confirmed that he saw the
12 jar of diamonds with Bockarie as he explained in a statement
13 dated 16/17 July 2007. The witness explained that it is also
14 correct, as he stated in an earlier statement dated 29/30
14:30:33 15 November and 4 December 2006, that Master General also saw the
16 jar of diamonds as both the witness and Master General saw
17 Bockarie with the jar at the same time, but the witness did not
18 mention the fact in the November/December 2006 statement that he
19 saw himself the diamonds as he was not sure at that time whether
14:31:19 20 he would be in trouble himself by saying that".

21 Pause there. Now up until this point, you have been
22 telling this Court that the reason why you did not mention
23 diamonds in your first interview was (1) because you were
24 mistrustful of the OTP as a result of what had been said to you
14:31:59 25 by somebody else and also that - and you told us this several
26 times - your head is not a computer. Here we see you giving a
27 completely different reason as to why you didn't mention it,
28 because at the time you didn't know whether you would be in
29 trouble by mention - saying it. Help us with this, please. How

1 could you have got in trouble by mentioning it?

2 A. I told you my head was not a computer and that was true.

3 And besides that even up to where I am sitting now there is -

4 there are some other informations coming into my head now that

14:32:57 5 are not on the documents and if you want me to explain them I can

6 explain, but my head is not a computer to recall all of the

7 things that happened since 1991 to 2007. I cannot get

8 al together.

9 Q. My question is very simple. How could you have got

14:33:18 10 yourself in trouble by telling the OTP about the diamonds?

11 A. Because I saw the diamonds with Sam Bockarie.

12 Q. Yes. How could you have got yourself in trouble by telling

13 that simple story?

14 A. I said I saw the diamonds with Sam Bockarie. What kind of

14:33:50 15 trouble are you referring to?

16 Q. Precisely. That is why I am asking the question, you see?

17 Because when we look at this paragraph the reason you give for

18 not having mentioned it is that you thought you would get

19 yourself in trouble, so I am trying to find out what trouble did

14:34:09 20 you think you could have got yourself into?

21 A. The misleading information the NPFL former senior officer

22 was giving to us. They misled us. They made the whole Monrovia

23 go into panic, because the former combatants who were there and

24 who - all other former combatants who were still in Monrovia that

14:34:39 25 people were coming from Freetown, the Special Court, and that

26 they wanted to ask them to find out what happened and if they did

27 they were going to be arrested and put to jail.

28 Q. I will ask my question once more and, if you don't answer

29 it, I will in due course suggest that that is because you have no

1 answer. How could you have got yourself in trouble by simply
2 saying to the OTP, "I saw a jar of mayonnaise taken from Sam
3 Bockarie's pocket"? How could telling that get you in trouble?

4 JUDGE DOHERTY: It is a jar of diamonds.

14:35:23 5 MR GRIFFITHS: A jar of diamonds, I am sorry. Did I say a
6 jar of mayonnaise? I am sorry. A mayonnaise jar of diamonds.

7 Q. How could that have got you in trouble?

8 A. Because Roland Duoh told us that anybody who was going to
9 be involved in giving information was going to be in trouble.

14:35:46 10 That was what I had at the back of my mind.

11 Q. Very well. Very well. I am not asking the same question
12 again. Now what we do know, in order to complete the picture, is
13 that when we turn to page 150 in this bundle there was a further
14 interview conducted with you on 5 December 2007 at which was

14:36:22 15 present Pete Maclaren and Chris Santora. I am not going to ask
16 anything about that, because it is right as we can see that what
17 happened during the course of that interview is that you were
18 shown a number of photographs and asked to identify people.

19 A. What number of functions?

14:36:54 20 Q. I am just asking you about number - I think you
21 misunderstand me. I have directed your attention to page 150
22 and, as you can see from that page and from the second page, you
23 were shown a number of photographs and you were asked to identify
24 people. Do you agree?

14:37:28 25 A. Yes.

26 Q. Thank you. Now, what we know is that thereafter on the 3,
27 4 and 5 January you had a further proofing meeting with
28 Prosecution Lawyers, didn't you?

29 A. Yes.

1 Q. Was that here in The Hague?

2 A. I did not understand that question correctly.

3 Q. Those three days, 3 January, 4 January and 5 January, were
4 you in The Hague?

14:38:27 5 A. Yes.

6 Q. Apart from yourself, who was present during those proofing
7 meetings?

8 A. It was not a meeting. I was called that I needed to
9 appear, but somebody was ahead of me and so I have been coming
14:38:51 10 around and I am going back, coming round, shopping in-between, so
11 until Wednesday.

12 Q. You see, we understand - and there is documentation to
13 support this at pages 152 and 153 of the bundle - that further
14 proofing of you, that preparation, took place on 3, 4 and 5 of
14:39:30 15 January of this year; the week before the trial started. Now,
16 all I am asking first of all is who was present during those
17 sessions?

18 A. I said to you I cannot recall all the names of the lawyers
19 that have been meeting me all this while, but different,
14:39:53 20 different people met me at different times. The person I meet
21 today they will be that I will meet another different person the
22 next time.

23 Q. On each of those days, how long did you spend with lawyers
24 from the Prosecution?

14:40:15 25 A. Sometimes we come for two hours and then they will say, "Go
26 back. Tomorrow you will appear", and I will go back and I will
27 come the following day. Sometimes three hours they will say, "Go
28 back until Wednesday", when I appeared.

29 Q. Were you told what you might be asked in cross-examination?

1 A. I did not even know about what you are talking about,
2 cross-examination, except in the Court here.

3 Q. Tell me, Mr Sheriff, did you in effect rehearse your
4 evidence during those three days?

14:41:05 5 A. What I knew was that I was going to be asked questions, but
6 that the cross-examination it is only in here that I have got to
7 know what you are referring to as cross-examination.

8 Q. Now I am about to conclude my questioning of you,
9 Mr Sheriff, but in concluding I want to put a number of

14:41:41 10 propositions to you. I suggest that because of your personal and
11 family experience you have always deep in your heart hated
12 Charles Taylor. That is right, isn't it?

13 A. That is not true.

14 Q. Even when the NPFL allegedly murdered your father's wives?

14:42:26 15 A. If that was so, I would not have agreed to join the
16 government of Mr Taylor.

17 Q. You see, I suggest that even when you were working in his
18 government you were plotting against him, no doubt in part
19 because of serious family pressure. That is right, is it not?

14:42:59 20 A. The assistance that I gave to him nobody could have done
21 that, the things that I did in Lofa.

22 Q. So the answer to my question is no?

23 A. It is no, that is not true.

24 Q. Indeed, Mr Sheriff, we suggest that you have always worked
14:43:25 25 against President Taylor. That is right, is it not?

26 A. No.

27 Q. And I further suggest that you may have gone to Sierra
28 Leone in 1998, but firstly you were not sent there to collect Sam
29 Bockarie by Charles Taylor. That is the truth, is it not?

1 A. He sent me to go and collect Charles Taylor[sic] - Charles
2 Taylor.

3 Q. It is right, is it not, that you have family in Liberia?

4 A. I have a large family in Liberia.

14:44:20 5 Q. You also have family in Sierra Leone?

6 A. Yes.

7 Q. Your family in Sierra Leone live near Buedu?

8 A. No.

9 Q. Don't they? Because, you see, what I suggest is that if
14:44:45 10 you did go to Sierra Leone in 1998, you went for your own
11 purposes and it was nothing to do with President Taylor. Do you
12 follow me?

13 A. That is not true.

14 Q. You may have gone, for example, to meet with members of
14:45:11 15 LURD, but it had nothing whatsoever to do with Charles Taylor.
16 That is the truth, isn't it?

17 A. Do you mean that LURD was busy in Sierra Leone? That is
18 not true.

19 Q. Well you had former ULIMO colleagues who were members of
14:45:45 20 LURD, didn't you?

21 A. That is not true.

22 Q. Did you have former comrades from ULIMO who had gone on to
23 join LURD, yes, or no?

24 A. That is true.

14:46:03 25 Q. And did you go to Sierra Leone to meet up with some of
26 those to give them information?

27 A. I never stepped in Sierra Leone except when I got the
28 instruction, because I was the SSS director. I would never leave
29 the capital city except I get instruction from the President.

1 The SSS director from the 50 to 58, no director had the right to
2 leave the town and go to somewhere if he was not directly
3 instructed by the leader. Not just in fact the SSS director
4 would just give you instruction to leave the country and go
14:46:57 5 anywhere, because if you are moving from the country the
6 President has to be aware of that.

7 Q. Which leads me to the next suggestion, which is that your
8 duties within the SSS did not permit you to spend as much time in
9 Lofa County as you are telling this Court?

14:47:28 10 A. Of course.

11 Q. You were for the most part based in Monrovia?

12 A. But I had a special assignment in Lofa.

13 Q. Because your primary responsibility was to organise the
14 motorcade and other matters particular to the President which
14:47:52 15 meant that you were for the most part in Monrovia, weren't you?

16 A. I was not alone working. I had my boss, I had my deputy,
17 who we are also fully responsible. They had full responsibility
18 if I was not around.

19 Q. My next suggestion is this. You were never instructed by
14:48:20 20 President Taylor to give arms to the RUF. That is the truth,
21 isn't it?

22 A. That is not true.

23 Q. Furthermore, your suggestion that you were privy - that you
24 sat in on - conversations between the President of Guinea and
14:48:49 25 President Taylor I suggest that is totally false?

26 A. I did not tell you that I sat down in meeting with them,
27 but the security would always be at the door, standing on their
28 feet, in where they were discussing, and they will get for the
29 most part most of the things that they discussed. There is

1 nowhere that the security who goes around with the leader, when
2 the leader enters a conference then you also enter there with
3 him. If I am a bodyguard, I have to stand outside on my feet.

4 Q. Outside?

14:49:38 5 A. Inside and outside.

6 Q. Because, you see, what I am suggesting is that you in your
7 role as a humble director in the SSS would never have been made
8 privy to such conversations. That is the truth, isn't it?

9 A. I did not understand that English.

14:50:05 10 Q. You in your role as assistant director in the SSS, your
11 rank was such that you would never have been present in such
12 high-powered meetings?

13 A. I did not tell you that I was part of the meeting. I did
14 say that we were standing in there and we heard what they were
14:50:37 15 discussing. I was not part of the meeting, but I was security
16 and my ears were there whilst they were discussing.

17 Q. I also suggest that you have never taken arms and
18 ammunition to any personal residence associated with President
19 Taylor?

14:51:10 20 A. Please repeat that.

21 Q. That you have never taken arms and ammunition either to
22 White Flower, or to the President's previous address by the
23 German embassy? That just never happened?

24 A. It happened.

14:51:32 25 Q. I also suggest that the photographs you say were taken at
26 Foya when arms were handed over to the RUF, that was never done
27 at the instigation of President Taylor?

28 A. It happened. You can visit Foya and ask the civilians.

29 Q. I also suggest, Mr Sheriff, because you agree, don't you,

1 that following the LURD invasion you were imprisoned for six
2 months? You were, weren't you?

3 A. Yes.

14:52:40

4 Q. And that was because you were suspected to be a traitor,
5 isn't that right?

6 A. It is not correct. After that I was promoted and given the
7 highest assignment ever.

14:52:57

8 Q. I am not interested in what happened afterwards. I am
9 talking about at the point when you were put in prison. At that
10 point you were considered a traitor, weren't you?

11 A. That was intelligence report, but after that I was promoted
12 and given higher assignments.

13 Q. So, you agree with me that at that point you were regarded
14 as a traitor? That is right, isn't it?

14:53:26

15 A. If they have concluded regarding me as traitor, they would
16 not have taken me out of the jail and given me a higher position
17 again. The men realised - the man realised later that the
18 information he had from people was not true and I continued to
19 defend him and I was the only person who stood fast to continue
20 to defend him. And after every two or three hours he will call
21 on me. At night, during the day, he will call on me and he will
22 tell me that, "Please try and defend the position where you are".

14:53:48

23 Q. I further suggest that the main reason why you were
24 suspected of being a traitor is because you had strong family and
25 friendship links with LURD?

14:54:16

26 A. That is true.

27 Q. So, you agree that you had strong family and friendship
28 links with LURD?

29 A. Of course.

1 Q. And was Abu Keita your conduit to pass information on to
2 LURD?

3 A. Abu Keita never worked for LURD. Abu Keita was one of the
4 senior commanders under Sam Bockarie - Mosquito. He was fighting
14:55:13 5 against LURD when he was instructed from Sierra Leone to enter
6 Liberia to assist and attack Guinea.

7 Q. Also, I suggest that you did not have the level of contact
8 with President Taylor that you would like this Court to believe?

9 A. I had contact with him and even up to the time he left the
14:55:49 10 leadership he proved it to me, because by then Benjamin Yeaten
11 was under house arrest in Togo and the only people he trusted in
12 was myself and Roland Duoh when he invited us to visit him in
13 Kalaba. If he never had trust in me, he wouldn't have asked me
14 to visit him.

14:56:13 15 Q. On that note, Mr Sheriff, you were asked to find photographs
16 and other independent proof of the account you were giving,
17 weren't you?

18 A. I did not understand what you said.

19 Q. You were asked to find photographic evidence to support the
14:56:40 20 account you were giving, weren't you?

21 A. No, nobody asked me. I thought it necessary to locate some
22 of my pictures at the time myself and Sam Bockarie were doing the
23 transaction.

24 Q. Tell me, so did you search through your photograph albums
14:57:07 25 for photographs?

26 A. All of my photos were in Voinjama, but the information what
27 they told me is they said that when they got the information that
28 Sam Bockarie was a wanted man and they knew very well that myself
29 and Sam Bockarie were involved in some transactions and that

1 Mr Taylor instructed me to go and get Sam Bockarie, my family
2 thought it necessary that all the pictures wherein myself and Sam
3 Bockarie appeared they decided to destroy all.

14:57:52 4 Q. Help me with this, because this was the purpose of my
5 question because you will remember I was asking you about how
6 close you were to the President. Did you find a single
7 photograph of yourself in company with President Taylor?

8 A. There are plenty. There are plenty. There are plenty.

9 Q. Where are they?

14:58:16 10 A. In Monrovia.

11 Q. Were you not asked to provide them to the OTP?

12 A. Nobody asked me for such a picture. Even the picture that
13 I brought, I did it all by myself. Nobody asked me for a
14 picture.

14:58:35 15 Q. Can we take it then that you did not provide a single
16 photograph to the OTP showing you close to President Taylor?

17 A. If they were going to ask me --

18 Q. A single photograph, yes or no?

19 A. No.

14:58:59 20 PRESIDING JUDGE: Please don't speak over each other again.

21 MR GRIFFITHS:

22 Q. Thank you, witness. Because what I am suggesting is, you
23 see, Mr Sheriff, and this is my last suggestion, that I am
24 suggesting that you have inflated your role in order to lend a
14:59:21 25 false credibility to your evidence. Do you understand me?

26 A. That is not true.

27 MR GRIFFITHS: I have nothing further to ask, your Honours.

28 PRESIDING JUDGE: Thank you. Ms Hollis, do you wish to
29 re-examine the witness?

1 MS HOLLIS: Thank you, Madam President.

2 RE-EXAMINATION BY MS HOLLIS

3 Q. Mr Witness, I would like to ask a series of questions
4 relating to issues or matters that have been the subject of
15:00:18 5 questions to you by the Defence counsel. The first question I
6 would like to ask relates to page 98 of the Defence bundle, and
7 that is 00027836 if that could be placed on the overhead, please.

8 Mr Witness, your attention was directed to paragraphs on
9 this page that related to LURD control in Lofa County and, as you
15:01:15 10 noted in the first paragraph - the second paragraph, excuse me,
11 on this page, there were three locations which you said the LURD
12 took control of and that was Voinjama, Kolahun and Zorzor. Do
13 you see that paragraph?

14 A. Yes.

15:01:40 15 Q. The paragraph following that was also read to you and that
16 is the paragraph in which you state that Foya was controlled by
17 Taylor forces from 1997 to 2003. Do you see that paragraph, yes?

18 A. Yes.

19 Q. If at this time, please, MFI-1 could be brought forward and
15:02:10 20 placed on the screen. Now if you recall, witness, when these
21 paragraphs were shown to you it was in the context of questions
22 about LURD control of the border between Liberia and Sierra
23 Leone. Now, would you please point out to the Judges where
24 Voinjama is located?

15:02:57 25 A. This is Voinjama City.

26 Q. And would you please point out to the Judges where Kolahun
27 is located?

28 A. This is Kolahun.

29 Q. Would you please point out where Zorzor is located?

1 A. This is Zorzor.

2 Q. Now as to the area you said was held by Charles Taylor's
3 forces, would you please point out to the Judges where Foya is
4 located?

15:03:36 5 A. This is Foya connecting the border with Mendekoma and
6 Buedu.

7 Q. Thank you. Now you may remove MFI-1, if you would, please.
8 Now if we would look back at page 98, the last paragraph was also
9 read out and that paragraph indicates that, "The LURD have
10 massive support from the Guinea government after the attacks in
11 2000 on the four fronts", and it mentions again the four fronts.
12 Now for completeness I would like to draw your attention, please,
13 to look at the third paragraph from the bottom of that page and
14 the paragraph says that:

15:04:32 15 "In 2000 Charles Taylor contacted the RUF to come to attack
16 Guinea. Taylor gave the RUF bases in Foya and Kolahun. Then RUF
17 attacked Guinea through Gueckedou. The AFL was also attacking
18 Guinea from 2 other fronts. There were three major fronts in
19 Lofa County at that time. One in Zorzor, with Commander Varlee
15:05:16 20 Telleh from ATU base with attacks launched against Fassalinguni
21 in Guinea. The second front was in Voinjama, with as AFL
22 commanders Liberian Mosquito and Fassu. From that front they
23 launched attacks against Macenta and Masadu in Guinea. The third
24 front was from Kolahun and Foya and this was a front controlled
15:05:56 25 by the RUF with Abu Keita as one of the commanders. There was a
26 fourth front from Sierra Leone to attack Guinea".

27 So in the last paragraph when you speak about four fronts,
28 are you speaking of the front in Zorzor, the front in Voinjama,
29 the front in Kailahun and Foya and the fourth front from Sierra

1 Leone? Are those are the four fronts you are talking about?

2 A. Yes.

3 Q. Thank you. Now, Mr Witness, during your testimony you were
4 asked several questions about mental illness and at one point in
15:07:01 5 your testimony you testified that to you mental illness is
6 telling the individual that they are crazy. Do you remember
7 that?

8 A. Yes.

9 Q. Would you please tell the Court what do you mean if you
15:07:22 10 would say a person is crazy? What do you mean by the word
11 "crazy"?

12 A. Where you are not to yourself. Let me clear a little bit
13 about that. Let me be clear about that. When the NPFL started
14 organising - when I advised Mr Taylor, before we could go Guinea,
15:07:50 15 when they started preparing the mission to attack Guinea I didn't
16 want to be involved in attacking Guinea. I didn't want to be
17 part of the attack on Guinea. Attack in Sierra Leone and Guinea,
18 I would be attacking my family members. So, I personally made
19 myself stupid so that they can forget about me. Other than that,

15:08:19 20 it didn't take three to four months when I was called and given
21 arms and ammunition to attack. I said if there is a war in
22 Liberia and somebody comes and attacks me in Liberia I can defend
23 the government against that, but I cannot be a part of any war
24 that would attack Sierra Leone because that is my motherland. My
15:08:42 25 great, great ancestors from Mali empire went to Guinea to come to
26 Liberia. I cannot be a part of any force to attack Guinea. So,
27 I was not crazy, I had my senses and I knew what I was doing.

28 Q. And, sir, again I will ask you to speak slowly so the
29 translation can follow and, so that I understand, you said that

1 to you a person is crazy when you are not yourself. Is that what
2 you said?

3 A. When somebody is crazy that means you do not have your
4 senses and all my senses were correct, but, at the time, if I had
15:09:29 5 not behaved funny to look like somebody who didn't have his
6 senses they wanted to instruct me to be a part of the attack on
7 Guinea or Sierra Leone and I didn't want to be a part of that.
8 So, when the war entered in Liberia I knew that Mr Taylor had a
9 right to defend himself. When he called me and instructed me and
15:09:49 10 gave me ammunition, and gave me Chief of Staff position, I
11 fought, but I cannot be part of an attack on Guinea and Sierra
12 Leone. That is why I said I was not feeling well. But every
13 time he sends people to check on me at my house I will say I was
14 not feeling well. My mother would always tell them that, "He is
15:10:11 15 not well, he is not correct."

16 Q. Mr Witness, you testified today - before I ask the
17 question, let me tell you: Think carefully and do not state
18 where you went. I do not want you to state a location. However,
19 you testified today that in April 2007, because of threats, you
15:10:39 20 and your family were relocated out of Liberia, is that correct?

21 A. Yes.

22 Q. And at that time did you receive a temporary leave of
23 absence from your job at the SSS?

24 A. I asked the Special Court to make a request because I
15:11:08 25 didn't want to leave my country and I was working with the
26 Special Security Service and tomorrow if I leave without any
27 permission it will not be correct. I think the Special Court
28 made a delegation to meet with Madam Sirleaf and to grant me to
29 testify at the Special Court.

1 Q. Now, another area of questioning of the Defence counsel had
2 to do with ECOMOG control in Liberia during the years from 1990
3 until 2000. Now, you testified earlier that in 1990 you were in
4 school in Kakata and I would like to ask you, while you were in
15:12:01 5 school in Kakata in 1990, did you have any meetings with ECOMOG?

6 A. No, I was not a security. I was just a common student.

7 Q. You also testified that you fled from Kakata and eventually
8 you moved to your mother's village in Sierra Leone. Now, during
9 this movement from Kakata to eventually finding yourself in your
15:12:36 10 mother's village, during that time period did you have any
11 meetings with ECOMOG?

12 A. No, no, I was a civilian. I didn't know anything at that
13 time about military. I didn't meet with any ECOMOG. I had never
14 seen ECOMOG at that time. There was no ECOMOG in Liberia at that
15:13:01 15 time.

16 Q. While you were in Sierra Leone did you ever meet with
17 ECOMOG?

18 A. No, no.

19 Q. You testified earlier that you entered Liberia in 1992, is
15:13:24 20 that correct?

21 A. Yes.

22 Q. In 1992 were you based in Monrovia?

23 A. Based in Klay. I have a house that I rented on Camp
24 Johnson Road. My family was staying there.

15:13:41 25 Q. In 1992. And where is Camp Joseph Road, Camp Johnson Road?

26 A. Camp Johnson Road is a road leading from the Executive
27 Mansion street in the central city.

28 Q. Now, during 1992 did you have any meetings with ECOMOG?

29 A. ECOMOG - when Monrovia was attacked October, in October

1 1993, ECOMOG asked for our assistance, ULIMO. When both INPFL
2 and NPFL launched the attack and wanted to overthrow the interim
3 Government we moved in with ULIMO and were assisted in the city
4 and that is why Prince Johnson, who was the leader of INPFL,
15:14:44 5 surrendered to ECOMOG.

6 Q. What year was that?

7 A. 1993.

8 Q. Go back to 1992. In 1992 did you, yourself, have any
9 meetings with ECOMOG?

15:15:03 10 A. The only meeting was at the buffer zone at Paul River. The
11 commander on the ECOMOG side and the commander of ULIMO, most of
12 the time would go and talk to them to make sure that there are no
13 problems. That is what we were talking with ECOMOG. Apart
14 from that, no further meeting.

15:15:30 15 Q. And in 1994 where were you based?

16 A. In 1994 I was general supervisor. I had no particular
17 base, but I was moving to Lofa to ensure - because I was having a
18 war in Lofa with RUF, Lofa Defence Force and NPFL. So, all my
19 concentration was in Lofa.

15:16:02 20 Q. And during 1994 did you have any meetings with ECOMOG?

21 A. The only meeting that I have been explaining to you is when
22 there was any problem at the buffer zone we would have
23 discussions with them. Sometimes they would complain and we
24 would ask what happened. I remember meeting ECOMOG on many
15:16:31 25 occasions, but I do not know the particular one that you are
26 referring to, but when we were being allowed to go to any part of
27 Monrovia during 1993 and 1994, during the interim government
28 which was headed by Amos Sawyer.

29 Q. I didn't quite understand the last part of your answer. In

1 1994 were you allowed to go into Monrovia?

2 A. I said when NPFL and INPFL launched an attack in October
3 1993, ECOMOG asked for our assistance to protect the capital city
4 and we were allowed, ULIMO was allowed, in Monrovia to protect
15:17:25 5 the city alongside the EFL.

6 Q. Thank you for that clarification.

7 Now, if at this time the witness could be shown MFI-7 and I
8 would like to ask you some questions about the area in Liberia
9 controlled by ULIMO. If you could just show that to the witness
15:17:53 10 first so he may refresh his recollection and then if that could
11 be placed on the projector, please. Now, it appears that there
12 are three counties and a part of a fourth county within that
13 circle and so I would like to ask you a question for each county.
14 So, if you would look first at Grand Cape Mount.

15:18:35 15 A. Yes.

16 Q. What year did ULIMO gain control over Grand Cape Mount?

17 A. From the ending of 1992 to 1993 ULIMO was in control of
18 Grand Cape Mount. It was only when the split came between
19 ULIMO-J and ULIMO-K and ULIMO-J then was in charge of the Grand
15:19:03 20 Cape Mount, but it was the same ULIMO.

21 Q. We also see there County Gbarpolu, G-B-A-R-P-O-L-U, and
22 could you please tell the Court in what year did ULIMO gain
23 control over Gbarpolu County?

24 A. 1993.

15:19:25 25 Q. We also see Lofa County and could you tell us in what year
26 ULIMO gained control over Lofa County?

27 A. ULIMO attacked Lofa County in 1993, but we had a war in the
28 Foya area bordering Sierra Leone, both NPFL and RUF were
29 attacking us from Sierra Leone and so we had Loma, Lofa Defence

1 Force, that had been organised in 1994. NPFL and Lofa Defence
2 Force were attacking us from the position at St Paul, between
3 Lofa and Bong County.

15:20:15 4 Q. It appears from this map that you also had control over a
5 portion of Bomi County, B-O-M-I, is that correct?

6 A. We had total control of Bomi.

7 Q. In what year did you gain total control of Bomi?

8 A. This was controlled by ULIMO-J later. ULIMO-J were in Bomi
9 and Cape Mount. That is why I put it that you can see the yellow
15:20:48 10 mark. Bomi, Grand Cape Mount was ULIMO-J. Bopolu, Lofa was
11 ULIMO-K. We had four counties.

12 Q. Thank you, now that map can be removed.

13 Now, during your answers to Defence counsel's questions you
14 were asked if you agreed that in one of your statements you said
15:21:15 15 you went on your assignment to get Sam Bockarie wearing your SSS
16 uniform. Can you tell the Court, please, why when you went on
17 this assignment, why did you wear that uniform?

18 A. I wore the uniform because it did not have any
19 communication. The uniform could make me heavy. When a group of
15:21:44 20 people are in government uniform they would be respected. That
21 was the reason why I wore the uniform.

22 Q. Now, Defence counsel also asked you if you had testified
23 that you had no difficulty crossing the border into Sierra Leone
24 and you said you never had any difficulty at the border. Now,
15:22:18 25 let me ask you this: When you crossed from Liberia into Sierra
26 Leone, on the Liberian side did you encounter any check points?

27 A. At the time that area had been under the control of ULIMO
28 on the left side of Liberia. We have just had elections. I was
29 the first government official who travelled to this place and so

1 even though the former fighters did not have arms in the town,
2 they were not moving around with arms, there was nobody in
3 authority, but I was the first government official who visited
4 that area, so I was respected. All the check points from
15:22:56 5 Monrovia, apart from ECOMOG check points, all the check points
6 had been dismantled. There was no check point anywhere apart
7 from the main road from Monrovia to Gbange because that was
8 controlled by NPFL at that time. So, they still had the various
9 check points in Gbange. In all these places I was respected and
15:23:18 10 they all monitored and they heard when I was appointed Assistant
11 Director for Operations. It was nationwide, so everybody
12 respected me.

13 Q. Let us go back to crossing the border from Liberia to
14 Sierra Leone. When you reached the Sierra Leone side, was there
15:23:35 15 a check point?

16 A. They had a check point there. It was controlled by the
17 RUF, but those were junior officers. I didn't face any
18 difficulty there. I just explained what my mission was to them
19 and when I got to Pendembu that was where they started asking me
15:23:59 20 from one question to the other.

21 Q. Now, while we are talking about check points, Defence
22 counsel also asked you about ECOMOG road blocks, or check points,
23 in Liberia and during your testimony you mentioned, on two
24 occasions, that ECOMOG were at 15 Gate.

15:24:24 25 Now, if the witness could please be provided MFI-1. Now,
26 on that map, and could you please raise it so that Monrovia is
27 shown, perhaps you can move the top of it up some so that - now
28 can you show --

29 A. Yes, it is appearing now.

1 Q. -- where 15 Gate is located?

2 A. 15 Gate is located around here, close to the city, very
3 close to the city.

4 Q. Your Honours, the witness was pointing between Kakata and
15:25:28 5 Careysburg on the green route, on the green route, and, witness,
6 the distance you appear to indicate it was about halfway between
7 Kakata and Careysburg, is that correct?

8 A. Between the two towns you will find 15 Gate. It is - 15
9 gate is first town. The name of the town from division 1 to
15:26:03 10 division 45, all is named as a number. So, 15 Gate is a
11 junction. One road is leading to Monrovia and you will find
12 another road that would leave from 15 Gate to get to Harbel and
13 then Roberts International Airport, and you would branch off to
14 Monrovia.

15:26:29 15 Q. Thank you. Mr Witness, during questioning by the Defence
16 counsel you also were asked to show the Court the size of the
17 mayonnaise jar, or bottle, of diamonds which Sam Bockarie took
18 from his - the inside of his coat and in describing the size at
19 one point you indicated the length of your palm, is that correct?

15:27:05 20 A. Yes, that is the medium size.

21 Q. Now, when you say that it was the length of your palm, what
22 do you mean? That was the height, or the width?

23 A. May I stand to be corrected. The medium size of the
24 mayonnaise jar, I am just estimating from this end to this end.

15:27:34 25 Q. So it is from your wrist, just at your hand, to the end of
26 your longest finger?

27 A. Yes, that is the estimation.

28 Q. Now, is that the height of the jar, or the width of the
29 jar?

1 A. That is the height. That is the height.

2 Q. Now, do you yourself have any estimate of how many
3 centimetres, or inches, it is from the beginning of your hand to
4 the end of your longest finger? Do you, yourself, have any such
15:28:09 5 estimate?

6 A. No.

7 Q. Now, you also --

8 MR GRIFFITHS: If it assists, your Honour, perhaps we ought
9 to measure this? Apparently the Learned Court Manager has access
15:28:26 10 to a tape measure.

11 PRESIDING JUDGE: So be it. Let the witness's palm be
12 measured.

13 THE WITNESS: It is 20.

14 MS HOLLIS: Is that 20 centimetres?

15:28:44 15 THE WITNESS: Yes.

16 MS HOLLIS:

17 Q. Your Honours, I would note that the centimetres to inch is
18 2.54 centimetres equal one inch. Does Defence counsel object to
19 that?

15:28:59 20 MR GRIFFITHS: Not at all. You are a better mathematician
21 than me.

22 MS HOLLIS: I actually Googled it and that is what they
23 told me.

24 PRESIDING JUDGE: Some of these are undisputed facts. So
15:29:13 25 noted.

26 MS HOLLIS: Thank you, your Honour.

27 Q. Now, next I would like to draw your attention to some of
28 the testimony that you gave last Friday and ask you to clarify
29 it. You were asked questions, as I have said, about Sam Bockarie

1 having diamonds and you saw the diamonds in Voinjama. Then in
2 further questioning about these diamonds, at one point you
3 testified that you needed more information from the bodyguard of
4 Sam Bockarie later to the diamond issue. That is why you went
15:30:03 5 through the bodyguard. You tried to ask him and he explained to
6 you that you needed additional information relating to Sam
7 Bockarie's diamond use and you wanted him to give you details
8 because he was directly assigned to Sam Bockarie. Now, can you
9 tell us, please, what details, if any, this bodyguard gave you?

15:30:43 10 A. He explained the same thing to me: That Sam Bockarie had
11 diamonds. I also did not stop there. That was, in fact, some of
12 the reasons why I sent some of my bodyguards to Sierra Leone and
13 I was told that most of the people who were recruited from
14 Liberia, most of them were sent around the diamond mines and so I
15:31:07 15 knew definitely that Sam Bockarie was involved in diamond
16 business and bringing over diamonds to Monrovia, to Mr Taylor,
17 and that was, in fact, the reason why he was being supplied with
18 arms and ammunition quickly for him to carry on with the war,
19 because Eddie Kanneh also confirmed to me that he was the Diamond
15:31:32 20 Manager and so all my information that I put together I ended up
21 concluding that Mr Taylor was involved in diamond business, but I
22 particularly did not see him with my naked eyes discussing
23 diamond affairs, or diamond business, together with Sam Bockarie.
24 That is, in fact, the more reason why I need to explain what I
15:31:59 25 heard, what someone explained to me and what I saw with my naked
26 eyes.

27 Q. Thank you. Now, Mr Witness, you were also asked about a
28 trip that you made, first to Togo to see Benjamin Yeaten and then
29 on to Kalaba in Nigeria to see Charles Taylor. Now, while you

1 were testifying about your visit with Benjamin Yeaten you
2 testified that Benjamin Yeaten communicated with Charles Taylor
3 and that Benjamin Yeaten sat down on the ground during that
4 communication. Would you please explain to the Court what you
15:32:42 5 meant when you said that Benjamin Yeaten sat down on the ground
6 during that communication?

7 A. When we were invited, that is Roland Duoh and myself, when
8 we were invited to go to Kalaba we decided to travel to go to
9 Togo first and we went to Benjamin Yeaten because we wanted him
15:33:11 10 to confirm for us and then he called Mr Taylor. Whilst he was
11 calling him he moved from the chair and sat on the ground while
12 he had the phone over his ear communicating to Mr Taylor. And
13 then I asked him, I said, "Oh, boss man, why have you left the
14 chair to sit down on the ground?" Then he said to me, "When I am
15:33:32 15 communicating with my father it appears to me as though he was
16 standing over me and so I have been so much used to that to the
17 extent that even when he is not around me, I don't see him with
18 my eyes, I have to sit on the ground because I assume he is
19 standing over me." From there he spoke with Mr Taylor and he
15:33:51 20 told him that we were travelling to go and see him and then we
21 travelled, we went to him.

22 Q. Thank you, Mr Witness.

23 One final area to clarify and if the Court Manager would
24 assist me by going to Page 8 in the Defence bundle and that is,
15:34:17 25 at the top, 00036740. Now, initially Defence counsel referred
26 you to the question which begins at line 16. That is the
27 question I want to talk about: What you saw and heard in terms
28 of Taylor's relationship with RUF. Defence counsel then moved to
29 an answer beginning at line 28. Now, for completeness, if we

1 could also look at the specific question asked to you at lines 20
2 to 22, the question you are answering from line 23 on, and at
3 line 20 the question begins, "Okay, let's start from the
4 beginning when Taylor came into power, okay? What was the first
15:35:45 5 thing that you saw in terms of Taylor's relationship with the
6 RUF?" Do you see that?

7 A. I see it.

8 Q. And, your Honours, that is page 8, 00036740, and the lines
9 that I just read are lines 20 through 22.

15:36:32 10 A. Uh-huh.

11 Q. Then in response to that question you begin on line 23
12 answering the question, saying, on line 23, "He personally called
13 me." Then a question, "Okay." Then at lines 25 to 26 you say,
14 "When the ECOMOG removed the government that overthrew Tejan

15:37:03 15 Kabbah." And the question then, "So the AFRC/RUF government?"
16 And then you elaborate on your answer from line 28 on. Do you
17 see that?

18 A. Yes.

19 Q. Your Honours, I have no further redirect examination of
15:37:26 20 this witness. I would at this time like to move for admission of
21 several exhibits which have been marked for identification and,
22 your Honours, I would begin with MFI-1. That is the map of the
23 main supply routes which was found at tab 26.

24 PRESIDING JUDGE: Yes, Mr Griffiths?

15:38:10 25 MR GRIFFITHS: Your Honour, we object to this map in its
26 current form and our objection can be summarised in this way: We
27 have no objection to the map itself going before the Court. Our
28 objection is limited merely to the caption at the top of the map.
29 Your Honours will recall the evidence of the witness and we would

1 submit that his evidence comes to this: That map depicts not RUF
2 - not supply routes to the RUF, but routes by which anyone
3 travelling from Monrovia to that part of the country could take.
4 That is really the sum of it and we submit that it is highly
15:38:59 5 prejudicial and unsubstantiated to leave the caption in the way
6 it is. What we suggest is that, for example, the caption could
7 be Tippexed out and we would have no objection to it going before
8 the Court, absent that caption, or perhaps stick something over
9 it.

15:39:21 10 PRESIDING JUDGE: You do not object to the testimony of the
11 witness when he was explaining what is the green road, what is
12 the red, what is the purple route, what these various routes
13 represent?

14 MR GRIFFITHS: Yes, I did, your Honour.

15:39:35 15 PRESIDING JUDGE: What you did - you had a chance to
16 cross-examine and he gave his testimony, but what you do object
17 to is the heading.

18 MR GRIFFITHS: It is the heading.

19 PRESIDING JUDGE: Ms Hollis.

15:39:45 20 MS HOLLIS: Thank you, your Honour. Your Honour, the
21 witness in cross-examination was put exactly what Mr Griffiths
22 has just argued and in cross-examination the witness specifically
23 told the Defence that these were the routes that were used to
24 supply the RUF. Now, there may have been other uses for these
15:40:09 25 routes, but the witness did testify to that effect. Now, if your
26 Honours were to remove RUF from the exhibit the testimony of the
27 witness remains that these were the RUF supply routes for arms
28 and ammunition. So, we would suggest, on the basis of the
29 evidence, that the map as it is captioned is admissible into

1 evidence.

2 PRESIDING JUDGE: Ms Hollis, may I rule on this exhibit -

3 MS HOLLIS: Yes, your Honour.

4 PRESIDING JUDGE: - before you proceed.

15:41:36 5 We are of the view that this map will be admitted in its
6 current form. As to its contents, these will be given due weight
7 and will be duly weighed in light of the testimony of the
8 witness. So, this map, as it appears, along with its heading, is
9 admitted in evidence as exhibit ---

15:41:56 10 MS IRURA: Your Honour, Prosecution exhibit 25, P-25.

11 PRESIDING JUDGE: Prosecution exhibit P-25.

12 [Exhibit P-25 admitted]

13 MS HOLLIS: Your Honour, the next exhibit is exhibit MFI-2,
14 which is a map of Liberia which was found at tab 27.

15:42:15 15 MR GRIFFITHS: No objection, your Honour.

16 PRESIDING JUDGE: That map is exhibit P-26.

17 MS IRURA: That is correct, your Honour.

18 [Exhibit P-26 admitted]

19 MS HOLLIS: The Prosecution moves for the admission of
15:42:30 20 MFI-3 A and B, and A is the photograph which was at tab 290
21 showing the back of the pickup truck with the people in the
22 pickup truck. MFI-3 B -

23 PRESIDING JUDGE: Mr Griffiths?

24 MR GRIFFITHS: I have no objection, your Honour.

15:42:58 25 PRESIDING JUDGE: Okay, thank you. MFI-3, would you like
26 to maintain the same exhibit number same for A and B, or what?

27 MS HOLLIS: I would like to have one exhibit number with A
28 and B, yes, your Honour.

29 PRESIDING JUDGE: Okay. So, the first photograph, MFI-3 A,

1 becomes exhibit P-27 A and the second exhibit is P-27 B.

2 [Exhibit P-27 A to B admitted]

3 MS HOLLIS: The next exhibit, your Honours, is MFI-4. This
4 is operation order. The witness identified Abu Keita's name on
15:43:37 5 the order as the Abu Keita who was sent to work with the RUF.
6 This was found at tab 21, your Honours, and he also identified
7 the signature of Benjamin Yeaten at the bottom of the operation
8 order. The order is dated 20/1/01.

9 PRESIDING JUDGE: Which tab was that? Sorry, Ms Hollis, I
15:44:20 10 have lost the tab. What tab was that?

11 MS HOLLIS: Tab 21, your Honour.

12 PRESIDING JUDGE: Tab 21. So, this was MFI-4 which becomes
13 exhibit --

14 MR GRIFFITHS: Well, your Honour, just a moment.

15:44:46 15 PRESIDING JUDGE: I beg your pardon.

16 MR GRIFFITHS: We object to this exhibit, your Honour, on
17 two bases really. The first is relevance. In our submission,
18 the first basis of admissibility has to be relevance and we ask:
19 How is this relevant to the case against this accused?

15:45:08 20 Secondly, there is nothing to prove the provenance of this
21 document and this witness, whose name does not appear on the
22 document - neither does the signature of a person referred to as
23 "Major General Keita". His signature does not appear on the
24 document. The question therefore is: Who can legitimately
15:45:32 25 produce this document in Court such that its provenance can be
26 verified? That is the basis of our objection.

27 PRESIDING JUDGE: Ms Hollis?

28 MS HOLLIS: Thank you, Madam President. First as to
29 provenance, this witness has testified that he recognised the

1 signature of Benjamin Yeaten whose name and position is at the
2 bottom of the document.

3 He has also testified that Benjamin Yeaten was in charge of
4 the militias in the effort against the LURD in Lofa County and he
15:46:07 5 has testified that Abu Keita, the Major General Keita who appears
6 on the order, is the Abu Keita who went to the RUF in Sierra
7 Leone to fight with them and then later, when the LURD attacked
8 Liberia, came back with the RUF to fight with Charles Taylor's
9 forces in Liberia against the LURD.

15:46:35 10 We believe he has identified a signature at the bottom and
11 that is relevant to the provenance of the document for your
12 Honours, the weight to be assigned by your Honours. He has
13 identified a person who was sent to the RUF and then came back
14 with the RUF to fight with Charles Taylor and that is relevant to
15:46:56 15 a variety of theories of liability in this case; the first being
16 the joint criminal enterprise, the second being the aiding and
17 abetting and, as proof of that, the close association that
18 Charles Taylor had throughout the charge period with the RUF, the
19 AFRC/RUF. We believe it is relevant and we believe there is
15:47:19 20 sufficient evidence for the provenance.

21 PRESIDING JUDGE: We are of the view that MFI-4 is relevant
22 and admissible under the Rule 89. The issues raised or the
23 questions raised by Defence counsel go to weight and not
24 admissibility. So the document is admitted as Exhibit P-28.

15:48:39 25 MS IRURA: That's correct, your Honour.

26 PRESIDING JUDGE: Is it 28 or 29?

27 MS IRURA: P-28.

28 PRESIDING JUDGE: P-28.

29 [Exhibit P-28 admitted]

1 MS HOLLIS: Your Honour, that brings us to MFI-5 which is a
2 photograph that was found at tab 24 and this is a photograph that
3 shows a little girl with an amputated arm and the witness
4 testified that this was the girl who was shown by President
15:49:07 5 Kabbah at the ECOWAS meeting in mid-1999.

6 MR GRIFFITHS: Again, your Honours, the issue is one of
7 relevance. My learned friend helpfully reminded the Court a
8 moment ago of the way in which the Prosecution put their case as
9 against this accused. It is not being suggested that he
15:49:39 10 personally directed the mutilation of this small child and we
11 know that, having indicated this in August of last year, that so
12 far as the so-called crime base witnesses are concerned it is not
13 the Prosecution's case that this accused himself personally on
14 the ground directed the mutilation of any individual.

15 In our submission consequently it's difficult to see what
16 this photograph is relevant to. If my learned friend can
17 indicate an issue as between the Prosecution and the accused to
18 which this is relevant then I would be grateful to be so
19 informed, but in our submission as things currently stand it has
15:50:09 20 no relevance whatsoever.

21 MS HOLLIS: The relevance of this photograph is that it
22 goes to several forms of liability being alleged against this
23 accused. It goes to his intent or awareness of crimes being
24 committed which he is aiding and abetting, it goes to his
15:51:04 25 awareness of crimes being committed which we suggest he is
26 instigating. It also goes to the third area or the third
27 category of joint criminal enterprises and that is it puts him on
28 notice of violent crimes which are reasonably foreseeable. The
29 Prosecution submits for these reasons this photograph and the

1 testimony surrounding it are relevant and admissible.

2 PRESIDING JUDGE: The tribunal is of the view that this
3 photograph MFI-5 is relevant and admissible and is therefore
4 admitted as Exhibit P-29.

15:52:18 5 [Exhibit P-29 admitted]

6 MS HOLLIS: Your Honour, the last exhibit is a cumulative
7 exhibit, MFI-6.

8 MR GRIFFITHS: Your Honour, can I short-circuit this by
9 indicating that we have in objection to the identifications made
10 of the individuals in these five photographs.

11 MS HOLLIS: Then, your Honour, we would ask it be marked
12 with one number and then A, B, C, D and E. As your Honours
13 recall A was the photograph at tab 29 G, B was the photograph at
14 tab 29 I, C was the photograph at tab 29 K, D was the photograph
15 at tab 29 JJ and E was the photograph at tab 29 W.

16 PRESIDING JUDGE: These various photographs are admitted in
17 evidence as exhibits 30 A through E in the order that counsel for
18 the Prosecution has admitted them.

19 [Exhibit P-30 A to E admitted]

15:53:40 20 MS HOLLIS: Madam President, your Honours, the Prosecution
21 has nothing further with this witness.

22 PRESIDING JUDGE: Do I take it that the trial chamber
23 discards MFI-7 as having served its purpose?

24 MS HOLLIS: Your Honour, that is a Defence exhibit.

15:54:05 25 PRESIDING JUDGE: I know it is a Defence exhibit. I am
26 putting this question bluntly to either side.

27 MR GRIFFITHS: I would very much like that document to be
28 exhibited, your Honour, yes.

29 PRESIDING JUDGE: It would be your first. I don't know if

1 it would be the first Defence exhibit, would it?

2 MR GRIFFITHS: I think it will be.

3 MS IRURA: Your Honour, will be Defence exhibit 1, D-1.

4 PRESIDING JUDGE: Exhibit D-1.

15:54:31 5 MR GRIFFITHS: I am most grateful.

6 PRESIDING JUDGE: Ms Hollis, do you have any objection to
7 this?

8 MS HOLLIS: No objection.

9 PRESIDING JUDGE: Then the map that is MFI-7 is admitted as
15:54:42 10 exhibit D1.

11 [Exhibit D-1 admitted]

12 PRESIDING JUDGE: Four copies of Exhibit D-1 will be
13 circulated to the judges in due course. We like to keep a little
14 collection of exhibits each.

15:55:15 15 Mr Witness, I want to thank you for your testimony. We
16 have come to the end of your testimony today and you are free to
17 leave.

18 THE WITNESS: Thank you.

19 PRESIDING JUDGE: You can leave the Court.

15:55:56 20 Ms Hollis, I don't know if you are in a position to call
21 your next witness.

22 MS HOLLIS: We are, your Honour, and the Prosecution's next
23 witness is TF1-114 and the direct examination will be conducted
24 by Mr Christopher Santora.

15:56:11 25 MR ANYAH: Good afternoon, your Honour. I will be
26 undertaking the cross-examination for the Defence.

27 PRESIDING JUDGE: Very well. This is a protected witness,
28 I understand. Is this a protected witness?

29 MR SANTORA: Good afternoon, your Honours. It is not a

1 protected - he will be testifying openly.

2 PRESIDING JUDGE: In what language?

3 MR SANTORA: In Mende.

4 PRESIDING JUDGE: I have information - just a minute,
15:57:36 5 please. Just a minute. We are informed reliably that TF1-114 is
6 covered by the existing measures ordered by Trial Chamber I in
7 the RUF case. Is that correct?

8 MS HOLLIS: Your Honour, TF1-114 was the subject of a
9 request for rescission of those protective measures.

10 JUDGE DOHERTY: We haven't seen an order.

11 MR ANYAH: That is our understanding, your Honour, as well.

12 PRESIDING JUDGE: That he rescinded?

13 NEW SPEAKER: Yes. He did testify in the AFRC case and I
14 believe he testified openly in that case.

15 PRESIDING JUDGE: Not in the AFRC case. Probably RUF.
16 Just give us a moment before this witness comes.

17 MS HOLLIS: May I assist you, your Honour. In the RUF case
18 the witness did testify and the witness did testify openly and to
19 the extent your Honours have not been informed of the request for
15:58:36 20 rescission, the Prosecution will make it orally at this time.

21 Based upon in depth discussions with there witness concerning his
22 situation and any issues about open testimony we were informed by
23 the witness that he does wish that the protective measures be
24 rescinded and that he be allowed to testify in open Court.

15:59:01 25 PRESIDING JUDGE: Just a moment, please. Give me a bit of
26 time.

27 Ms Hollis, subject to maybe the written order being found,
28 which we haven't yet been able to find, you have now placed on
29 record an application for rescission of the protective measures

1 of this witness TF1-114 and the trial chamber, in the absence of
2 any objection on the opposite side, grants that request. So the
3 witness may come in in open Court.

4 MR ANYAH: Madam President, if it please the Court, before
16:00:15 5 the witness is called there is a preliminary issue I would like
6 to raise with the chamber in respect of his evidence. Like I
7 indicated previously, this witness did testify before this same
8 chamber during the AFRC case. I believe he testified on July 14
9 of 2005. He also testified on July 18 of 2005.

16:00:51 10 When the chamber reviews its judgment in the AFRC case,
11 that judgment having been issued on June 20th 2007, the chamber
12 will notice that it did rely on this particular witness in
13 respect of several findings of fact. For the purposes of
14 perfecting the record I would, with the chamber's permission,
16:01:19 15 point to the relevant sections of the AFRC judgment upon which
16 the evidence of this witness was relied on.

17 The first of those sections being on page 73 of the
18 judgment, paragraph 187. He is cited in footnote 301. The
19 specific finding of fact that he was found to be credible about
16:01:52 20 was that Kailahun District was under the control of Sam Bockarie.

21 There is reference to this same witness again on page 73 of
22 the AFRC judgment, in particular in paragraph 194 and in footnote
23 331. In that section of the judgment the reference to this
24 witness is in relation to a finding by the chamber that Buedu was
16:02:26 25 a village that was attacked by the RUF in Kailahun District.

26 On page 90 of the judgment in paragraph 235 and footnote
27 452, likewise again the chamber relies in part on the evidence of
28 this witness in making the factual finding that civilians were
29 attacked in Buedu in Kailahun District.

1 The fourth reference to the witness appears on page 110 of
2 the judgment, specifically in paragraph 311 in footnote 604, and
3 there the finding of fact relates to the identity of Alex Tamba
4 Brima.

16:03:19 5 A fifth reference or reliance on the witness's evidence
6 appears on page 111 in paragraph 312, in particular footnote 609,
7 and there the finding of fact being that Alex Tamba Brima was a
8 respected football player.

9 The sixth reference is on page 112 in paragraph 316 in
16:03:49 10 footnote 624 and that involves the finding that Mr Brima planned
11 and took part in or was involved in the coup of May 25th 1997.

12 The seventh section of the judgment which relies on this
13 witness's evidence appears on page 141 in particular paragraph
14 432.

16:04:17 15 PRESIDING JUDGE: Counsel, I don't wish to interrupt your
16 points, but we are just wondering. As we sit here listening to
17 findings regarding the AFRC, where is there leading? What is the
18 point of your objection to this witness?

19 MR ANYAH: Yes, your Honour, my objection is a sensitive
16:04:34 20 one, but it is one that we feel obligated to make on record as
21 counsel and it implicates the, if you will, impartiality of
22 the entire trial chamber vis-a-vis this witness's evidence.

23 PRESIDING JUDGE: In what way? Please explain or
24 elaborate.

16:04:57 25 MR ANYAH: Yes, Madam President, I will.

26 PRESIDING JUDGE: Because the AFRC is not one of the
27 organisations contained in this particular case or in the
28 indictment. So please throw some light on what you mean.

29 NEW SPEAKER: Yes, Madam President. The witness is being

1 brought before the chamber I would propose to testify about facts
2 and events that took place in Kailahun District, in particular in
3 the village of Buedu, and some of that evidence, as I have
4 indicated in going through the AFRC judgment, featured in that
16:05:34 5 trial and that is precisely one of the reasons why I suspect the
6 Prosecution has disclosed his transcript from that case to us.

7 That being the case, and considering that the chamber did
8 find him to be credible, he is appearing before the same bench of
9 judges - and again I preface my remarks by saying this is a
16:06:01 10 matter of record, to perfect the record as counsel, just in case
11 there happens to be an appeal some day.

12 MS MUZIGO-MORRISON: Excuse me, your Honour. Could we take
13 back the witness to the waiting room instead of him waiting
14 outside the door?

16:06:21 15 PRESIDING JUDGE: Can you not let the witness wait in the
16 wings? This will not take long, I am sure.

17 MR ANYAH: We make the application that it would be
18 appropriate considering the language in Rule 15 of the rules
19 which deals with disqualification of judges, the relevant
16:06:38 20 standard being that recusal is permissible when the impartiality
21 of a judge might reasonably be doubted on any substantial ground.
22 We believe that we are obligated to make this a matter of record
23 and in light of the application we would go ahead and make a
24 proposal - a proposed resolution, if you will, to the chamber.

16:07:08 25 One possible resolution of this issue could be that the one
26 member of the bench before whom I appear today, His Honour
27 Justice Sow, who did not perhaps partake in the deliberations or
28 the credibility findings of this particular witness could make
29 the determination regarding his credibility vis-a-vis his

1 testimony in the proceedings today, but that is one
2 recommendation that we would propose to the chamber.

3 In closing I would just say for the record we would make a
4 recurring application in respect of any other prospective witness
16:07:55 5 who has been found to be credible having testified before in the
6 AFRC case and who does appear before this chamber to testify in
7 this case. Thank you, Madam President.

8 PRESIDING JUDGE: Ms Hollis?

9 MS HOLLIS: First of all, your Honour, the Prosecution
16:08:17 10 disclosed the transcript from the AFRC trial because it is our
11 duty to disclose statements of the witness and that is why we did
12 that.

13 As to Rule 15, the Defence has raised nothing that might
14 lead to a conclusion that the impartiality of your Honours might
16:08:38 15 reasonably be doubted on any substantial ground.

16 First of all, your Honours are professional judges. Judges
17 may sit in cases where they hear evidence which has been
18 presented in other cases. So that reality does not give rise to
19 the standard that is set out in rule 15.

16:09:02 20 Your Honours have done or said nothing to the knowledge of
21 the Prosecution that would independently put your impartiality in
22 question.

23 JUDGE LUSSICK: And one other thing, Ms Hollis, we have no
24 idea whatsoever what testimony this witness is about to give in
16:09:22 25 this case.

26 MS HOLLIS: That is correct. And, on the other hand,
27 should the witness testify similarly to what your Honours have
28 heard before, as professional judges you are able to weigh that
29 testimony in light of all the evidence in the case and reach your

1 conclusions as to credibility.

2 As to Judge Sow, he is of course an alternate judge in
3 these proceedings and there is nothing that would disqualify any
4 or all three of the regular judges in this trial chamber from
16:09:56 5 hearing this evidence and so we would oppose the Defence
6 application. We believe it is unfounded and we would make the
7 same submissions for any additional objection they would raise
8 based on any other witness. Thank you.

9 PRESIDING JUDGE: Now, counsel - Defence counsel, your name
16:10:16 10 again, please.

11 MR ANYAH: Morris Anyah.

12 PRESIDING JUDGE: Mr Anyah, I want you by way of reply to
13 shed some light on whether in your knowledge this witness is
14 coming to replicate his testimony in the AFRC trial or not? We
16:10:36 15 need to know, because, as my brother said here, we have no clue
16 what this witness is coming to testify to, but perhaps you know
17 better. Is he coming to repeat his testimony in the AFRC case?

18 MR ANYAH: Well, I would not be bold enough to say that he
19 is coming to repeat it root and branch. I would indicate that
16:10:57 20 there will be overlaps. He will testify about factual events
21 that I suspect he testified to before the AFRC bench. So I
22 cannot proffer to the chamber that his testimony will cover the
23 exact same subject matter, or the exact same factual information.
24 There will be overlaps needless to say.

16:11:26 25 I would add one more thing considering the comments by our
26 learned colleague, Ms Hollis, and that is this: We are not
27 alleging in any way whatsoever that we have a specific factual
28 basis to suggest that the chamber is biased or any member of the
29 chamber is biased. We are simply making a legal objection to

1 perfect the record, considering that this same bench has found
2 this same witness to be credible under circumstances where he
3 testified to facts some of which will feature in this particular
4 trial. I suspect we are obligated in many jurisdictions to make
16:12:17 5 such an objection and I would leave my submissions at that.

6 PRESIDING JUDGE: Thank you, Mr Anyah. Please allow me to
7 confer.

8 We have heard the application from the Defence and the
9 response and reply thereto. We are of the view that the
16:13:47 10 objection is completely unmerited under the Rule 15. There is no
11 basis for it there. We reject it.

12 We are professional judges who are able to weigh the
13 evidence then with the evidence that will come before us and to
14 be able to tell where the witness is at and what he is alluding
16:14:12 15 to without any bias whatsoever. The two cases are very, very
16 different.

17 So we will now call upon the witness to be brought in so
18 that we may hear his evidence.

19 WITNESS: TF1-114 [Sworn]

20 PRESIDING JUDGE: Incidentally, Ms Hollis, what language
21 will this witness be speaking in? Sorry, Mr Santora.

22 MR SANTORA: Mende.

23 PRESIDING JUDGE: Mende, for the record.

24 EXAMINATION-IN-CHIEF BY MR SANTORA:

16:17:50 25 Q. Good afternoon, Mr Witness.

26 A. Yes, good afternoon.

27 Q. I just want to make sure you are hearing my voice
28 translated to you in Mende?

29 A. Yes, very well.

1 Q. Mr Witness, I am going to ask you a series of questions?

2 A. Okay.

3 Q. And I want you to speak slowly?

4 A. Okay.

16:18:26 5 Q. Listen to the entire question and it is translated to you
6 before you respond?

7 A. Okay.

8 Q. Okay. Before I start, can you please state your full name
9 for the Court?

16:18:52 10 A. My name is Dennis Koker.

11 Q. And can you please tell the Court where were you born?

12 A. I was born in Jimmi Bagbo.

13 PRESIDING JUDGE: I am going to ask you to do some
14 spelling, some serious spelling here.

16:19:13 15 MR SANTORA:

16 Q. Mr Koker, can you please spell your name in its entirety?

17 A. Yes, I can.

18 Q. Can you go ahead and do that for the Court?

19 A. Yes, I can. D-e-n-n-i-s Dennis, K-o-k-e-r Koker. Dennis
16:20:06 20 Koker.

21 Q. Now you stated you were born in Jimmi Bagbo. Can you
22 please spell that for the Court?

23 A. J-i-m-m-i Jimmi, B-a-g-b-o Bagbo. Jimmi Bagbo.

24 Q. What district is that in?

16:21:11 25 A. Jimmi Bagbo is in the Bo District.

26 Q. And that's in Sierra Leone, is that correct?

27 A. Yes.

28 Q. Do you know the date of your birth?

29 A. Yes.

- 1 Q. What is it?
- 2 A. I was born on December 26th 1968.
- 3 Q. And are you a member of a particular tribe in Sierra Leone?
- 4 A. Mende.
- 16:21:49 5 Q. And did you go to school?
- 6 A. Yes, I went to school.
- 7 Q. Where did you go to school?
- 8 A. In my home town, government secondary school, Jimmi Bagbo.
- 9 Q. And how far did you get in school - how far did you
- 16:22:10 10 complete in school?
- 11 A. I stopped at form five.
- 12 Q. Sir, do you know how to read and write?
- 13 A. Yes, I can try.
- 14 Q. Now can you please tell the Court what languages you speak?
- 16:22:46 15 A. I can speak Mende, that is my mother tongue, English and
- 16 Krio. Those three languages.
- 17 Q. Okay. Now before the war in Sierra Leone did you have an
- 18 occupation?
- 19 A. I worked once.
- 16:23:27 20 Q. Can you repeat that, Mr Witness?
- 21 A. I used to work in a construction company, Philip Houseman
- 22 [phon].
- 23 Q. And what did you do for them, for the construction company?
- 24 A. I was doing sign writing. Writing on the tarmac.
- 16:23:56 25 Q. These are signs for the road?
- 26 A. Yes.
- 27 Q. Now after the war in Sierra Leone started did you join the
- 28 army, the Sierra Leonean army?
- 29 A. Yes. Yes, I joined the army in Daru barracks.

1 Q. Do you remember - do you remember the year - do you
2 remember when you joined the army?

3 A. Yes.

4 Q. When was it?

16:24:41 5 A. 1991.

6 Q. And can you remember the month?

7 A. Yes, March. Between March and April. Those are the
8 months.

9 Q. Now during the time of the NPRC regime in Sierra Leone were
16:25:12 10 you still a member of the army?

11 A. Yes.

12 Q. What was your position during the NPRC regime?

13 MR ANYAH: Objection, your Honour. I am objecting on the
14 basis of foundation. I don't think it's fair to be assumed that
16:25:35 15 we all know when the NPRC was in office even though some of us
16 might know it.

17 PRESIDING JUDGE: Counsel, perhaps you might redirect.

18 MR SANTORA: I can redirect. I believe it's - but I will
19 be happy to just redirect the question.

16:25:52 20 Q. Mr Witness, do you know when the NPRC regime came into
21 power in Sierra Leone?

22 A. Yes, 1992. It was April 1992.

23 Q. And do you know who the leader of the NPRC was?

24 A. Yes, Captain Valentine ES Strasser.

16:26:28 25 Q. What was your position during the NPRC regime?

26 A. At that time I was a personal security to the person who
27 was the adviser to the President Strasser. His name was retired
28 Colonel SB Jumu.

29 Q. Do you know how to spell his name?

1 A. Yes.

2 Q. Go ahead?

3 A. Jumu, J-u-m-u.

16:27:14

4 Q. You stated that you were his personal security, is that
5 correct?

6 A. Yes.

7 Q. And what was his position in the NPRC? Can you just state
8 that. When I say his, I mean what was EB Jumu's position?

16:27:44

9 A. At that time he was a member of the supreme council of
10 state and an adviser to the President.

11 Q. Now where were you at the time of the AFRC coup in Sierra
12 Leone?

13 A. At that time I was at the Juba workshop, electrical and
14 mechanical engineers workshop Juba.

16:28:21

15 PRESIDING JUDGE: Counsel, I have to interrupt. I am
16 advised that there is only one-and-a-half minutes left on the
17 tape. Perhaps it would be prudent not to proceed too far for
18 today.

16:28:35

19 MR SANTORA: Maybe one more question just for finishing up
20 one area, or we can cease right now if that's better.

21 PRESIDING JUDGE: Mr Witness, you have started your
22 testimony a little late today. We will continue tomorrow. I
23 just wish to advise you or to direct you not to discuss your
24 testimony with anyone.

16:28:50

25 THE WITNESS: Okay, thank you.

26 [Whereupon the hearing adjourned 4.20 p.m. to
27 be reconvened on Tuesday, 15 January 2008 at
28 9.30 a.m.]

29

I N D E X

WITNESSES FOR THE PROSECUTION:

TF1-406	1109
CROSS-EXAMINATION BY MR GRIFFITHS	1109
RE-EXAMINATION BY MS HOLLI S	1190
TF1-114	1217
EXAMINATION-IN-CHIEF BY MR SANTORA	1217

EXHIBITS:

Exhibit P-25 admitted	1205
Exhibit P-26 admitted	1205
Exhibit P-27 A to B admitted	1206
Exhibit P-28 admitted	1207
Exhibit P-29 admitted	1209
Exhibit P-30 A to E admitted	1209
Exhibit D-1 admitted	1210