



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 16 NOVEMBER 2009
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr Simon Meisenberg

For the Registry:

Ms Rachel Irura
Mr Benedict Williams

For the Prosecution:

Ms Brenda J Hollis
Mr Mohamed A Bangura
Mr Christopher Santora
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Morris Anyah
Ms Salla Moilanen

1 Monday, 16 November 2009

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:31:21 5 PRESIDING JUDGE: Good morning. We will take appearances,
6 please.

7 MS HOLLIS: Good morning, Mr President, your Honours
8 opposing counsel. This morning for the Prosecution, Brenda J
9 Hollis, Mohamed A Bangura, Christopher Santora and our case
09:33:05 10 manager Maja Dimitrova.

11 PRESIDING JUDGE: Yes, Mr Anyah.

12 MR ANYAH: Good morning, Mr President. Good morning,
13 your Honours. Good morning, counsel opposite. Appearing for the
14 Defence this morning, Courtenay Griffiths QC, myself Morris
09:33:24 15 Anyah. We are joined by our case manager Ms Salla Moilanen and
16 an intern in our office, Mr Isaac Ip.

17 Mr President, at some point this morning, whenever
18 convenient to your Honours, I would like to make an application
19 on behalf of the Defence.

09:33:41 20 PRESIDING JUDGE: This would be a convenient time,
21 Mr Anyah.

22 MR ANYAH: Thank you, Mr President. This application
23 relates to a motion that is soon to be filed by the Prosecution.
24 Your Honours ordered the Prosecution to file a motion regarding
09:33:55 25 its desire to use certain new materials during the
26 cross-examination of Mr Taylor. Our response was ordered due
27 next Monday, 23 November. Now, over the weekend, I wrote an
28 email to your legal officer, Mr Simon Meisenberg, copying the
29 Prosecution, advising them that we would be making this

1 application in respect of that response that's due next week and
2 the application is this:

3 The current practice direction on the filing or dealing of
4 documents in The Hague sub-office requires that responsive
09:34:34 5 pleadings be limited to ten page in number. We would like to
6 exceed that page limit to file a response that adds up to about
7 15 pages. We require showing of exceptional circumstances for
8 that page increase. We point to your Honour the Presiding
9 Judge's remarks last week regarding the importance of this
09:34:55 10 pleading, regarding the need for thorough legal research and the
11 inclusion of all relevant jurisprudence as forming the basis for
12 the exceptional circumstances that warrant an oversized filing.

13 Your Honours will recall that the Prosecution made a
14 similar application last week on Thursday. The Defence did not
09:35:16 15 oppose it and subsequently on Friday last your Honours issued an
16 order indeed granting the Prosecution leave to file a brief or
17 motion that totals up to 15 pages. So that's our application. I
18 will respectfully ask for that, Mr President and your Honours.

19 PRESIDING JUDGE: Thank you, Mr Anyah. Ms Hollis, any
09:35:37 20 response to that application?

21 MS HOLLIS: Yes, Mr President. The Prosecution supports
22 the application up to an extension to 15 pages.

23 PRESIDING JUDGE: Thank you. By consent, that application
24 is granted, Mr Anyah.

09:36:05 25 MR ANYAH: Thank you, Mr President. We are grateful.

26 PRESIDING JUDGE: Ms Hollis.

27 MS HOLLIS: Thank you, Mr President. We have reviewed the
28 situation and we have devised a means by which we can proceed at
29 least for some time and on that basis we would like to proceed

1 with the cross-examination, understanding the current position
2 regarding any additional materials.

3 PRESIDING JUDGE: All right. Thank you.

4 Mr Taylor, I remind you you are still bound by your
09:36:46 5 declaration to tell the truth.

6 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

7 [On former affirmation]

8 CROSS-EXAMINATION BY MS HOLLISS: [Continued]

9 Q. Good morning, Mr Taylor.

09:36:54 10 A. Good morning, counsel.

11 Q. Mr Taylor, the RUF benefitted in several respects from the
12 culmination of the Lome peace process, isn't that correct?

13 A. Well, by benefitted I don't - would you help me, counsel,
14 what do you mean by benefitted? I don't understand your

09:37:17 15 question.

16 Q. Well, let's take a look at that. The Government of Sierra
17 Leone was required to assist the RUF in transforming into a
18 political party. That's correct, isn't it?

19 A. Well, to be factual, I - except for maybe some knowledge of
09:37:39 20 this, I would be not giving the Court the proper what I would
21 call wisdom of the circumstances because I do not recall the
22 agreement verbatim as you are requiring me to answer. I would
23 probably need some assistance in being able to go through those
24 provisions of the agreement. So I am sorry, I really can't help
09:38:10 25 because I do not recall verbatim everything that occurred in that
26 particular agreement.

27 Q. So, Mr Taylor, what you're saying is despite the fact you
28 had a negotiating team there, you yourself were there to ensure
29 the completion of the process and you were there for the signing,

1 you cannot recall if the Government of Sierra Leone was required
2 to assist the RUF in transforming into a political party. Is
3 that what you're telling the Court?

09:38:44 4 A. Well, yes, I am telling the Court that I cannot recall the
5 details of the agreement. I may need some assistance from the
6 Court in looking at the agreement. You are asking me to go
7 through an agreement that occurred in 1999 and I am saying to you
8 specifically I do not deny that that is the case, but I am just
9 saying I cannot recall verbatim. What I do recall is that
09:39:08 10 amongst Heads of State we were asked to assist in whatever way,
11 but I don't recall that the Government of Sierra Leone
12 specifically - I do not deny that, but I just don't recall that
13 specific aspect of the agreement.

14 Q. And another benefit that the RUF received, and Foday
09:39:26 15 Sankoh, is that Foday Sankoh and the RUF were to be given all the
16 rights and privileges of a political party, such as freedom of
17 expression, freedom of assembly, freedom to publish, the right to
18 mobilise and associate freely. That's correct, isn't it,
19 Mr Taylor?

09:39:45 20 A. I don't recall the details of the agreement. I don't. I
21 would need assistance to look at the agreement to be able to
22 ascertain the details that you go into. I have to be very, very
23 factual with this Court. We are talking about a very extensive
24 agreement that I signed personally and to ask me to go into the
09:40:07 25 details of that agreement, I am going to need some help by
26 looking at the agreement. I don't recall the specifics, all of
27 the specifics of the agreement.

28 Q. The Government of Sierra Leone as well as the RUF were
29 mandated to seek out resources from the international community

1 to set up a trust fund so that the RUF could transform into a
2 political party. That's correct, isn't it, Mr Taylor?

3 A. Like I am saying, I don't recall the agreement as you are
4 mentioning it. I would need to look at the agreement to
09:40:39 5 ascertain what you are saying, counsel. Answering yes or no to
6 your question now with the length and details, you are getting
7 into a detailed agreement, except I would be some advanced IBM
8 machine, I really wouldn't know the details of what you are
9 talking. I need some help.

09:41:00 10 Q. So you don't recall that either?

11 A. I don't recall the specifics of what you are talking about.
12 I have --

13 JUDGE SEBUTINDE: Mr Taylor, the initial question was
14 whether the RUF benefitted in several respects from the
09:41:18 15 culmination of the Lome peace process. Not necessarily
16 everything that was written in the agreement. This is how I
17 understood the initial question from which all these other
18 questions emanate; the process. The culmination of the process
19 was the question.

09:41:32 20 THE WITNESS: That is correct, your Honours and I said I
21 wanted to know what she meant - excuse me, not she. What the
22 honourable counsel meant by benefitted. An agreement is done,
23 sides benefit. When we get into the specifics of benefitting,
24 that's what I am talking about now because then she goes - then
09:41:55 25 the counsel goes into the benefits and I am saying that I don't
26 recall the specifics of those benefits or see them maybe as
27 benefits as she may, because in an agreement people don't
28 necessarily benefit, but for the sake of peace people agree to
29 things. But we are talking about an extensive agreement. I

1 think, your Honour, it would be unfair to me to begin to ask me
2 the specifics of an agreement that is not before me. That's what
3 I am answering to.

4 MS HOLLIS:

09:42:28 5 Q. Mr Taylor, the RUF also benefitted in that the Government
6 of Sierra Leone was required to enable the RUF members to hold
7 public office. That's correct, isn't it, Mr Taylor?

8 A. Well, the RUF members under the agreement were permitted to
9 hold public offices. I remember that aspect, yes.

09:42:46 10 Q. And the RUF benefitted in that the Government of Sierra
11 Leone was required to give the RUF high level posts in the
12 government. That's correct, is it not?

13 A. Well, I am not sure if that's a benefit again, if I am
14 responding to your question of benefitting from it. The

09:43:04 15 agreement was of such that it was agreed that both parties would
16 hold high positions in government.

17 Q. And included in those posts that the RUF was to hold was a
18 senior cabinet position and three other cabinet positions.

19 That's correct, isn't it?

09:43:20 20 A. I don't recall the exact amounts that you are talking
21 about, whether three or four. But I do know that the RUF, along
22 with the government of Tejan Kabbah were - did divide positions.
23 As to the quantity, I don't recall the quantity.

24 Q. Now, the RUF and Foday Sankoh also benefitted in that Foday
09:43:46 25 Sankoh was given a position answerable only to the President of
26 Sierra Leone. That is correct, is it not?

27 A. I don't know how to answer. I need some help from you,
28 counsel, because the Vice-President of a country does not just
29 answer alone to the President, he answers to the constitution.

1 So I need some help. What do you mean by answerable only alone
2 to the President? I don't understand.

3 Q. So, Mr Taylor, is it your understanding that Foday Sankoh
4 was given a position that made him the equivalent of a
09:44:22 5 Vice-President?

6 A. My recollection when I got there and the document that I
7 signed is that Foday Sankoh was one of two Vice-Presidents in
8 that government, from my recollection.

9 Q. And Foday Sankoh was made chairman of the board of the
09:44:40 10 commission for the management of strategic resources?

11 A. That is correct.

12 Q. For national reconstruction and development. Is that
13 correct?

14 A. That is correct, I recall that. Vice-President and
09:44:50 15 chairman, I recall that, yes.

16 Q. And as chairman of that particular entity, Foday Sankoh had
17 control over the proceeds of gold and diamonds. That's correct,
18 is it not?

19 A. Well, that was not my understanding, no. That is not
09:45:07 20 correct. I am not sure if he had control over - the gold and
21 diamond with the control of the State. I know he had - if you
22 are talking about management control, I would say. But control
23 as - you know, we could get into what you mean by control, but I
24 do know he had management over that committee. That's my
09:45:28 25 understanding of the agreement that I signed.

26 Q. The RUF also received another benefit from the culmination
27 of the Lome peace process, did it not, that in the form of a
28 guarantee of amnesty, isn't that correct?

29 A. There was amnesty, a guarantee for all parties. Yes, I do

1 recall that.

2 Q. And indeed, as you said, it was for all parties and that
3 would have included the AFRC as well; that's correct, is it not?

4 A. That's my understanding at the time, yes.

09:46:03 5 Q. And at the time of this process, you knew that that
6 provision was important because, as you told the judges, no one
7 on this planet would not have heard what was going on in Sierra
8 Leone. That amnesty was important, wasn't it, Mr Taylor?

9 A. Well, I don't know. I can't answer that. You are asking
09:46:24 10 me - I don't know what reason in their minds to request the
11 amnesty. They negotiated that agreement. So as to the
12 importance for them, I don't know. I can't say psychologically
13 how important it was. I do know that there was amnesty. And
14 again I want to emphasise to your Honours that this is a document

09:46:47 15 that the Prosecution produced the other day that led to this
16 confusion. Although we are going through the back door in
17 bringing in this document, because this was a document that
18 caused - I am being specific in my answers here. I do not recall
19 the details of this document that led to this confusion that you
09:47:05 20 are filing a motion for right now. So I just want to remind the
21 Court that this is the essence of the document that is still
22 coming in, and I do not - and cannot - be expected to get into
23 the details of this document as you are trying to put me through.

24 But I am going to be very truthful to the court. Where I recall,
09:47:23 25 I will tell you. But I cannot psychologically get into people's
26 minds.

27 Q. Actually, the question, Mr Taylor, was that you understood
28 that that amnesty was very important?

29 A. No, I have told you --

1 Q. That's correct, isn't it?

2 A. I have answered you. I have told you that I cannot
3 determine how important it was. I did not get into the
4 importance of amnesty. That was an amnesty for the Sierra

09:47:49 5 Leoneans. They negotiated that part. So I can't comment on that
6 part as to whether I thought as to whether it was important. I
7 thought the agreement in full was important.

8 Q. Now, Mr Taylor, your negotiating team that you had in place
9 from about April, did that negotiating team brief you on what was
10 happening at this process in Lome?

11 A. Let me - and your Honours, let me clarify. You are talking
12 about me having a negotiating team. The agreement was negotiated
13 between the RUF and the government of Tejan Kabbah. By saying a
14 negotiating team, the Government of Liberia was not a part of the
09:48:36 15 negotiations. We were there like ECOWAS and others to assist in
16 whatever way we can. Now, I keep hearing you referring to the
17 Liberian team as a negotiating team. Liberia was not a party to
18 this agreement. We were there to assist the process. So I
19 reject the notion of a negotiating team. This agreement was
09:49:00 20 negotiated between the Government of Sierra Leone and the RUF. I
21 want to clarify that. Liberia, Nigeria, Togo had groups there to
22 assist in moving the process forward.

23 If you want to, for your purposes, call it a negotiating
24 team, I just want to clarify: We were not a party to the
09:49:22 25 negotiations in the sense that I'm understanding you to ask the
26 question.

27 Q. So, Mr Taylor, today here in court how do you characterise
28 the team that you sent to Lome, including Joe Tuah and others?

29 A. D Musuleng-Cooper went down. I would characterise them as

1 helpers, what you would call enablers. I would use the word
2 enablers for me.

3 Q. So getting back to the amnesty. As a result of this
4 process, the RUF had amnesty for mass killings of civilians in
09:50:03 5 Sierra Leone, didn't they?

6 A. The amnesty covered all actions of the war, mass killings
7 or whatever would be a part of it.

8 Q. Mass rape; that was included?

9 A. Counsel, let's not get trivial here. The amnesty covered
09:50:24 10 all crimes committed during the war: mass rape, mass killing,
11 burnings, whatever you called it, it covered that. So I don't
12 have a quarrel with - it covered all actions on all sides,
13 whether it was the Government of Sierra Leone, whether it was the
14 RUF, it covered AFRC, it covered amnesty.

09:50:43 15 Q. So it covered the mass mutilations; that was covered in the
16 amnesty?

17 A. It covered everything, counsel.

18 Q. The Government of Sierra Leone, on the other hand, received
19 one primary concession from the RUF, isn't that correct, and that
09:51:05 20 was to recognise the Government of Sierra Leone that had been
21 elected over three years previously?

22 A. I am not sure I can characterise it at that particular - as
23 that way. I would disagree. Counsel, I am being factual here.
24 All sides benefitted. If you are trying to limit it to one
09:51:29 25 benefit, again if I got into the agreement, I may be able to
26 point to you several benefits that the government - the
27 Government of Sierra Leone, being the government of the day, they
28 benefitted from peace also. Wouldn't that peace be a benefit?
29 So would you just characterise the issue of being able to - peace

1 is a benefit. Cessation of hostilities is a benefit. Being able
2 to - disarmament is a benefit by own - from the Government of
3 Sierra Leone, as I would see it. Demobilisation is a benefit.
4 So counsel, when we get into benefits on both sides, the
09:52:13 5 government of the day benefitted through peace, and in that peace
6 process there were several things. So I would disagree that we
7 could limit it to one issue. I would disagree with you.
8 Q. And that peace that you talked about, the cessation of
9 hostilities, that was a long time coming in Sierra Leone, wasn't
09:52:33 10 it - a long time after this culmination of this Lome process?
11 A. Oh, we are getting into - long time coming? It depends on
12 what - we have had since the Korean War, the armistice, we still
13 don't have an agreement, you know, from the Korean war. Come on
14 let's not get - long time coming? That's also - it depends on
09:53:03 15 how you want to put it, counsel.
16 Q. Do you recall when the hostiles were declared over in
17 Sierra Leone?
18 A. My recollection is - I would say around the beginning of
19 2002, from my recollection, when President Kabbah - I think about
09:53:23 20 January or February, thereabouts - announced that the peace was
21 over, but, you know, that's my recollection. I think about 2002.
22 Q. Now, Mr Taylor, in relation to the amnesty that was
23 provided to the RUF, you yourself and your subordinates
24 benefitted from a similar amnesty before you left Liberia in
09:53:46 25 August 2003, isn't that correct?
26 A. I and my subordinates benefitted from an amnesty. After -
27 before I left office, the Legislature of Liberia passed into law
28 granting for the sake of peace general amnesty to all parties,
29 not just me and my subordinates. There were about seven

1 different parties that fought during the civil war and the
2 Legislature of Liberia saw fit to do so.

3 Q. And this general amnesty covered all acts from December
4 1989 until just before you left Liberia, isn't that correct?

09:54:30 5 A. I don't quite recall the year, but it did cover the period
6 of the - I think it was the period of the - not the old civil
7 war, but I do think it covered the period that I was in office,
8 if my recollection is correct.

9 Q. Actually, Mr Taylor, it began in December 1989, didn't it,
09:54:58 10 that amnesty?

11 A. You could be right about that. I don't recall the year,
12 but it did grant a general amnesty, yes.

13 Q. And it granted immunity from both criminal and civil
14 proceedings; that's correct, is it not?

09:55:14 15 A. That is correct.

16 Q. And it went into effect on 7 August 2003. Is that correct?

17 A. You could be right about that. I don't fuss about that.
18 Maybe you could be corrected later, I am not sure.

19 Q. Now, even after this culmination of the procedures, the
09:55:36 20 peace process in Lome, we can agree that - well, first of all, we
21 can agree that the Lome Peace Agreement itself was signed on 7
22 July 1999, yes?

23 A. Oh, we can agree on that, yes.

24 Q. Even after the signing of this Lome Peace Agreement, you
09:55:54 25 are still involved in Sierra Leone. We can agree with that, yes?

26 A. Again, you know, I don't want to be technical here. What
27 do you mean by I was involved in Sierra Leone? Would you help
28 me?

29 Q. You were involved in the events that were going on in

1 Sierra Leone, yes?

2 A. What do you know by events? Are you asking me if I was
3 continuously involved in the ongoing peace process? Yes. If you
4 leave it open, events, no.

09:56:21 5 Q. All right. So you, by your accounting, were involved in
6 the ongoing peace process in Sierra Leone?

7 A. That is correct.

8 Q. And one of the things that you were doing was encouraging
9 and advising Foday Sankoh to return to Sierra Leone, isn't that
10 correct?

09:56:41 11 A. Yes, I would say that was one of the things, yes. Amongst
12 others yes.

13 Q. He had delayed for a time after the signing of Lome to
14 return to Sierra Leone?

09:56:54 15 A. That is correct.

16 Q. Now, during this time there were developments in Sierra
17 Leone involving a group called the called the West Side Boys and
18 they were causing some problems in Sierra Leone. We can agree to
19 that, yes?

09:57:08 20 A. That is correct, yes.

21 Q. And in order to deal with this, you arranged for Johnny
22 Paul Koroma and some of his subordinates to come to Monrovia. We
23 can agree with that, yes?

24 A. That is correct.

09:57:21 25 Q. And when he arrived in Monrovia, you gave him
26 accommodation, a long-range radio and you gave him first
27 accommodation at Hotel Africa. We can agree with that, yes?

28 A. Generally, yes. Well, on the long-range radio, for the
29 record, not that I gave - he had access to a long-range radio.

1 Not gave. He had access to a long-range radio, yes.

2 Q. And this access to the long-range radio, where was that
3 long-range radio located to which he had access?

4 A. I am not sure. I really don't know the location. I was
09:58:06 5 President. I gave instructions that he should have access to a
6 radio to be able to contact his boys. That I ordered personally,
7 but I do not know which location he utilised for that radio.
8 Surely it was not at the presidency. There were many other
9 radios around the city. I do not know precisely, counsel, which
09:58:29 10 specific location, but I gave the orders.

11 Q. And to whom did you give those orders, Mr Taylor?

12 A. The security forces were - wherever, but he was authorised
13 to use it. The person that would be in direct - that would
14 receive the direct orders for such would be the national security
09:58:48 15 adviser at that time.

16 Q. Who was that at that time?

17 A. John T Richardson.

18 Q. And in addition to providing accommodation for Johnny Paul
19 Koroma, you provided accommodation to others who accompanied him
09:59:06 20 or came to meet with him there. That's correct, is it not?

21 A. That is correct. That is correct, yes.

22 Q. And he came to Monrovia in August 1999. That's correct, is
23 it not?

24 A. That is correct.

09:59:19 25 Q. And at one point there were even discussions about whether
26 Johnny Paul Koroma could go to Lome to consult with Foday Sankoh
27 there. That's correct, isn't it?

28 A. Well, then again now, let's get some specifics here,
29 counsel. Help me. When you say - I don't recall, counsel, any

1 discussions - when I say discussions, that would be between me
2 and other Heads of State - about the possibility of Johnny Paul
3 Koroma going to Lome. That discussion did not occur with me.

09:59:59

4 Q. Do you recall any discussions between yourself or your
5 representatives and Johnny Paul Koroma --

6 A. No.

7 Q. -- about that possibility?

8 A. No, no. No, not at all. In fact, it did not happen.

10:00:14

9 Q. Now indeed, at some point Foday Sankoh came to Monrovia and
10 he and Johnny Paul Koroma were there in Monrovia together before
11 proceeding back to Sierra Leone. We can agree to that, can we
12 not?

13 A. Yes, we can.

10:00:30

14 Q. And while they were there, you undertook to have talks
15 between them and with you to try to reconcile any differences
16 they may have. We can agree with that, can we not?

17 A. Yeah, we can agree. We can agree with that. I just want
18 to help you, counsel. The discussions in Monrovia just did not
19 circle around their differences, but it also had to do
20 specifically with even problems involving the agreement itself.

10:01:00

21 So we are talking about, yeah, they had their little internal
22 squabbles but it was more about the agreement itself and some
23 squabbles. So I would agree that in addition to the squabbles,
24 the differences, they also had the agreement, which was - where
25 certain issues, you know, arose, and I had to make it very clear
26 that those issues could not be changed. I would say that.

10:01:27

27 Q. After Foday Sankoh actually returned to Freetown, you
28 established a hotline between Monrovia and Freetown to facilitate
29 communication between your government and the RUF and AFRC. We

1 can agree with that, yes?

2 A. Well, no, we cannot agree unless I be specific and clarify.
3 A hotline was established between my government and the RUF, not
4 the AFRC. And my government and Tejani Kabbah. The AFRC, I did
10:02:23 5 not establish a hotline with the AFRC, so to speak. The AFRC was
6 not a part of that process, so it was the RUF and the Government
7 of Sierra Leone.

8 Q. And do you remember when it was that you established that
9 hotline?

10:02:40 10 A. I would say following the return of Foday Sankoh, around 2
11 October, or thereabout as far as my recollection goes. We
12 established this hotline in the context of my continued position
13 as mediator in the process, I did that, yes. I think that needs
14 to be contextualised.

10:03:15 15 Q. Now if we can look at late 1999 to 2001. In light 1999,
16 there was a problem that arose between Foday Sankoh and Sam
17 Bockarie. We can agree to that, yes?

18 A. Did I understand you to say '99 to 2001?

19 Q. Yes. In late 1999, there was a problem that arose between
10:03:37 20 Foday Sankoh and Sam Bockarie. We can agree to that, yes?

21 A. Yes, we can. Yes.

22 Q. In fact in December 1999 Sam Bockarie was extracted, to use
23 your word, from Sierra Leone to Liberia, yes?

24 A. That is correct.

10:03:52 25 Q. And after Sam Bockarie came to Liberia with many of his
26 men, his men were trained for certain security agencies,
27 primarily the ATU. We can agree with that, yes?

28 A. No.

29 Q. No?

1 A. We cannot agree with your language. I cannot agree with
2 that. I did not train his men. I trained Liberian citizens of
3 Sierra Leonean origin. They were no longer his men once he
4 entered the territorial confines of Liberia. So I disagree with
10:04:30 5 you to the extent that you say that I trained his men, I
6 disagree.

7 Q. So you trained the men who came with him?

8 A. That became Liberians with Sierra Leonean origin, not his
9 men.

10:04:40 10 Q. We will deal with that at a later point.

11 A. Okay.

12 Q. Now after Sam Bockarie was extracted, again using your
13 word, you provided him with lodgings near Paynesville. Can we
14 agree to that?

10:04:52 15 A. Yes, we can.

16 Q. And you provided him, his family and some bodyguards or
17 other men with him with food and medicine?

18 A. Yes, food, medicine and - yes.

19 Q. And financially you provide him with a stipend of about a
10:05:10 20 thousand dollars a month?

21 A. That is correct. And assisted some of his other family
22 members, yes.

23 Q. And these men who came with him and were being trained
24 predominantly for the ATU, they were receiving between \$100 and
10:05:23 25 \$400 a month depending on their placement?

26 A. Well, following the training, as following their training,
27 they did receive compensation, yes.

28 Q. And it was between \$100 to \$400 a month depending on where
29 they were working?

1 A. No, I wouldn't say depending on where they were working. I
2 would say depending on their ranks. They were not paid based on
3 where they were working. Based on their ranks and
4 qualifications.

10:05:55 5 Q. The retraining of these men who came from Sierra Leone with
6 Sam Bockarie, the stipends, the accommodation, they were paid
7 mostly by the Government of Liberia, correct?

8 A. Counsel, you know, again, you are saying they were paid
9 mostly by the Government of Liberia. They were paid entirely by
10:06:21 10 the Government of Liberia. Not mostly. Entirely by the
11 Government of Liberia.

12 Q. Now, at some point after Sam Bockarie had been extracted
13 from Sierra Leone and an incident occurred at Foday Sankoh's
14 compound in Freetown - we can agree with that, yes? It was in
10:06:46 15 May 2000?

16 A. That is correct, yes.

17 Q. And then at some point after this incident in May 2000,
18 Issa Sesay was made the acting commander of the RUF. We can
19 agree with that, yes?

10:07:03 20 A. Did I understand you to say at some point thereafter?

21 Q. Yes.

22 A. Yes, we can agree. Yes.

23 Q. In connection with that, you summonsed, your word, Sesay to
24 Monrovia. We can agree to that, yes?

10:07:25 25 A. Yes.

26 Q. And as part of the means by which Issa Sesay was to come to
27 Monrovia, you provided a helicopter to transport him part of the
28 way, yes?

29 A. That is correct.

1 Q. And you had a meeting with Issa Sesay in which you told him
2 that he should free the peacekeepers that the RUF had captured
3 earlier in 2000. We can agree to that, yes?

4 A. Well, okay, I can say yes, but we have to be careful here.
10:08:08 5 I can say here to qualify my "yes" that Issa Sesay was delivered
6 what I would call a message from the international community.
7 And I am saying this specifically because we are in a court of
8 law, when you say "and you said", so this must be considered in
9 the plural form. I was representing the views of the
10:08:33 10 international community. To that extent I will say yes.

11 Q. And it was you speaking with Issa Sesay on that occasion
12 about the freeing of the peacekeepers?

13 A. That is correct.

14 Q. And you obtained a commitment from Issa Sesay that indeed
10:08:47 15 he would free those peacekeepers. We can agree to that, yes?

16 A. That is correct.

17 Q. And indeed he did free the peacekeepers?

18 A. Yes, he did.

19 Q. And from Sierra Leone the peacekeepers came to Monrovia.
10:09:05 20 We can agree to that?

21 A. Yes, that is correct.

22 Q. During the period 2000 to 2001, we can agree that Issa
23 Sesay visited Monrovia on several occasions, yes?

24 A. Yes.

10:09:23 25 Q. And at one point he was given a satellite phone by you?

26 A. Well, yes, when you say - now your question was after the
27 fact now, but the satellite phone was given during the period of
28 the hostage situation. So not after. It was during.

29 Q. So, Mr Taylor, although we may disagree as to the extent or

1 why, we can agree that you had some measure of interaction with
2 Foday Sankoh, Sam Bockarie, Issa Sesay and Johnny Paul Koroma at
3 various periods during the time from 1991 to 2001, yes?

10:10:29 4 A. Well, I would say to you in answer to your question,
5 counsel, you have spread me between 1991 and 2001, which is
6 almost about ten years. I would answer you as such: All of
7 these periods had different reasons and different consequences.
8 Now, I regret that you have grouped them up, but I would say to
9 you I did have contacts with all of these people within the
10:10:55 10 period that you have mentioned for different legal and authentic
11 reasons. To that extent, I would say yes.

12 Q. And you provided at least some measure of support to those
13 persons during that time period, yes?

14 A. Within the context of my previous answer, depending on my
10:11:20 15 mission and what I was asked to do and authorised to do, I would
16 say yes.

17 Q. And this support benefitted the RUF and the AFRC, yes?

18 A. I would say whatever I did during that time, depending on
19 the time now, if you are talking about '91, '92 I would say it
10:11:42 20 benefitted the RUF. If you are speaking thereafter, I would say
21 it benefitted the peace process because my involvement thereafter
22 was basically for the process of peace and not the benefit to an
23 individual group.

24 Q. Now turning to another topic, Mr Taylor, you have told this
10:12:15 25 Court about the LURD shelling of Monrovia in 2003, including the
26 tragedy of shells falling in the Greystone compound in Monrovia,
27 yes?

28 A. That is correct.

29 Q. And that scores of people were killed and many others were

1 wounded as a result of this shelling, including people in the
2 Greystone compound, yes?

3 A. That is correct, yes.

10:12:50

4 Q. And you told the judges that the United States did not
5 condemn the attack on that compound. Is that correct?

6 A. To the best of my recollection, yes.

10:13:09

7 Q. And you told the judges that the United States' failure to
8 condemn the atrocities that occurred, the attack on that
9 compound, convinced you that they would go to any length and
10 probably kill the whole country to get rid of you. Isn't that
11 what you told the judges?

12 A. That is exactly what I said, in addition to the rest of the
13 city, yes.

10:13:21

14 Q. And you said it was then that you decided that in the
15 interests of peace and love for your people that you would leave,
16 that you would step down from the presidency?

17 A. Exactly, yes.

18 Q. And the Accra peace conference, that was convened on 4 June
19 2003 in Accra by President Kufuor, yes?

10:13:46

20 A. That is correct.

21 Q. And he was the then current ECOWAS chairman. Is that
22 correct?

23 A. That is correct.

10:13:57

24 Q. And you told the judges that at the Accra peace conference
25 you explained to the assembled Heads of State about this very
26 incident that you had explained; the shells falling, the people
27 getting killed. You remember telling the judges that?

28 A. Yes. Go ahead, yes.

29 Q. And you were referring to the shelling that included the

1 shells landing on Greystone compound, yes?

2 A. And the city of Monrovia, yes.

3 Q. And so you said that you told the Heads of State that you
4 had decided then that you would step down from the presidency,
10:14:32 5 yes?

6 A. Yes.

7 Q. And that after this meeting, you went outside to go to the
8 conference hall and that is where you and the others learned that
9 the indictment against you had been made public. Is that

10:14:49 10 correct?

11 A. Well, if I recall my exact statement, I said en route to
12 the conference hall. We had not reached the conference hall. En
13 route to the conference hall we were told about this and we
14 returned to Kufuor's office. Yes, that's my recollection.

10:15:06 15 Q. Now, Mr Taylor, your recollection of those events is not
16 completely accurate, is it?

17 A. Well, those are my recollections. Now if you have anything
18 to impeach that, bring it forward. Let me see.

19 Q. Mr Taylor, it's true, isn't it, that the LURD attack,
10:15:28 20 including the shells falling on the Greystone compound, in fact
21 occurred in July 2003, not June?

22 A. Well, let me tell you something, counsel, that is - LURD
23 attacks did not occur - it's a military operation, as you very
24 well know. It did not occur - I explained - LURD had been
10:15:48 25 attacking Monrovia since about March 2003. Those attacks were
26 continuous. Very continuous. It was not a specific period. It
27 continued. While I was in Accra in June attacks were going on.
28 They continued on until July. So I am not going to fight with
29 you. If you are trying to limit that military operations to

1 July, you are dead wrong. The attacks on Monrovia started from
2 March, they continued April. When I was on my way to Accra, the
3 attacks were continuing. They continued. So you are dead wrong.
4 I totally disagree that the attack on Monrovia was only in July.

10:16:30 5 I totally, totally disagree.

6 Q. Let's try it again, Mr Taylor. The attack that included
7 the shells falling on the Greystone compound, that attack
8 actually occurred in July. That's correct, isn't it, Mr Taylor?

9 A. Well, I wouldn't fight with that, but that was not only -
10:16:46 10 that was the most serious of the attacks. The fact of mortar
11 shells falling in Monrovia and on Greystone continued. The most
12 serious of those could have occurred in July, but Greystone was
13 not attacked once, if this is your question. Greystone was not
14 attacked once. The entire city of Monrovia came under attack.

10:17:08 15 So while it may be true that Greystone in July had a major attack
16 where a lot of people died, people died at Greystone before that,
17 and we will produce witnesses that were present at Greystone to
18 prove that it occurred, yes, July, but even before then. So
19 being specific about July is wrong.

10:17:26 20 Q. Mr Taylor, your own exhibit D-45, which is a Human Rights
21 Watch report, talks about this attack taking place - the worst
22 shelling taking place between July 21 and July 25. Do you recall
23 that exhibit?

24 A. I have no problem with that exhibit. I say yes. I am
10:17:54 25 trying to say to you that that exhibit speaks about the most
26 important and the most heinous attack on that particular time.
27 The attacks on Monrovia were consistent for months. Greystone
28 encountered many hits.

29 Q. And that exhibit talks about the shells falling on

1 Greystone compound on July 21, yes?

2 A. Counsel, I don't have any fuss with the dates. Greystone
3 was attacked. For me, the American government did not condemn
4 it. And if they did, I didn't - I even questioned it. Now, I
10:18:33 5 know there were other attacks on Greystone and like I say, since
6 we're in a Court, and there will be others. I do not dispute the
7 July attack. There were many such attacks. July was just one of
8 the many. I don't have a fuss with you on that.

9 Q. And in fact on 21 July, the United States did condemn the
10:18:55 10 shelling and urged a halt to the offensive on Monrovia. That's
11 correct, isn't it, Mr Taylor?

12 A. Well, that was not to my knowledge. If the United States
13 did, I did not receive any such notification, neither did I
14 receive any news report. We are talking about July 21. I left
10:19:16 15 August 11. So between the 21st to the 11th, we are talking about
16 what? Two, three weeks to my departure. I received no
17 notification of any US condemnation. I left Liberia on August
18 11, so we are talking about what? Two and a half weeks. I did
19 not receive any notification. So when I say that the
10:19:38 20 United States did not condemn it, I am speaking factually. I did
21 not, as President of Liberia, receive any - as would be the case.
22 There would be public condemnation, and there would probably be a
23 note to my government stating that the United States has
24 condemned this. So I did not receive it.

10:19:58 25 Q. Now, you have told this Court that when you were President,
26 you received daily briefings that would include briefings to you
27 about events that had been in the media, yes?

28 A. Yes, there were daily briefings, yes.

29 Q. And you are telling this Court that you received no

1 briefing about the United States condemning these attacks on 21
2 July?

3 A. That's what I am saying. Did I not receive any briefings
4 at this particular time, because these briefings would be
10:20:32 5 official statements. The United States government, as you know,
6 issues official statements. An official statement from the
7 United States would be delivered by - from my understanding -
8 two, maximum three sources: The State Department, the White
9 House, or the embassy accredited near the capital quoting the
10:20:51 10 White House or the State Department. I did not receive any
11 official statement from the United States government. If you
12 have one, I would like to see it. I did not receive it and I
13 don't think there exists one. So if there is one, I would stand
14 correct it. Produce it. I didn't see it.

10:21:12 15 Q. Mr Taylor, there is another aspect of your story to this
16 Court about what happened and what you told the leaders in Accra
17 in early June that I would like to talk about.

18 A. Yes.

19 Q. Now, according to your testimony to the judges, it was your
10:21:37 20 initiative that you had decided you would step down and the
21 African leaders assembled there in Accra accepted that decision,
22 yes.

23 A. 100 per cent. 100 per cent, yes. One hundred.

24 Q. Now, Mr Taylor, you don't consider President Kufuor to be
10:22:02 25 part of this conspiracy you have been alleging to get judges, do
26 you?

27 A. Kufuor was not a part. Kufuor was chairman.

28 Q. So when President Kufuor said that it was the African
29 leadership who took the initiative to convince you to agree to

1 resign, he was telling the truth, wasn't he?

2 A. He was not telling the truth, and I am not sure that's what
3 Kufuor was talking about. After we returned to the room after
4 the unveiling of this, they did a lot to encourage me. But every
10:22:38 5 Head of State that was in that meeting will tell you that I
6 volunteered. I, Charles Ghankay Taylor, volunteered. And after
7 we went back, they were very, very - when we returned to the room
8 - to Kufuor's office, then Kufuor and the rest of the Heads of
9 State said, "Well, listen, President Taylor, what are you going
10:23:01 10 to do?" And I said, "Well, I am going to reconsider and think
11 about what my options are." And they pleaded with me at that
12 particular time to go along. But I, Charles Ghankay Taylor,
13 volunteered. And one of those Presidents in there will be able
14 to verify that. I did. Nobody convinced me to. I did.

10:23:20 15 Q. And which President will be able to verify that, Mr Taylor?

16 A. Oh, that's - I am not permitted under the rules of the
17 Court to tell you which will be there. There is a motion that
18 protects my witnesses, isn't there?

19 Q. Well, Mr Taylor, you are the one who keeps talking about
10:23:33 20 who is going to come to testify here?

21 A. I did not call names. I simply said my witnesses will
22 testify.

23 Q. Now, if we can look, please, at MFI-299. This would have
24 been tab 137, binder 3 of 4, week 33. If we could - do you see
10:25:20 25 this one or more articles from the New African, and if you could
26 please go to the fifth page of that document. It's the one with
27 the picture that says "The American visit by President
28 Johnson-Sirleaf". There is a photo of her on that page, fifth
29 page. If we could look at the column on the right, the top

1 paragraph beginning with, "Later, Kufuor told New African". And
2 if we could go six lines down where it says:

3 "Incidentally, the African leadership had taken the
4 initiative to convince Mr Taylor to resign and allow all the
10:26:25 5 factions in Liberia to negotiate."

6 Do you see that language, yes?

7 A. Yes, I do see it.

8 Q. Thank you. That can be removed.

9 And, Mr Taylor, after you in fact stepped down as President
10:26:52 10 and went to Nigeria, several Heads of State accompanied you to
11 Nigeria. That's correct, is it not?

12 A. That is correct, yes.

13 Q. And the reality is, those Heads of State accompanied you to
14 Nigeria to ensure that in fact that's where you went. That's the
10:27:08 15 reason they went with you, is it not?

16 A. No, not to - this is not what I was told by them. This is
17 your assessment. If you ask me, "What did they say to me?" an
18 agreement had been made for me to go to Nigeria. I had agreed to
19 go to Nigeria out of three countries that had stated. Obasanjo
10:27:34 20 should have been there. He sent an aircraft. So your assertion
21 that I was supposed to skip and run to some other country is
22 totally nonsense. Total nonsense. I mean, I was going to
23 Nigeria. Prior to my departure, arrangements - my staff had
24 gone, preparations had been made. Nigeria had airlifted my
10:27:59 25 household supplies. There was no such thing as what you are
26 suggesting that they were trying to prevent me from going to
27 another place except, you know, something that I don't know. No,
28 that's not my understanding, counsel.

29 Q. Mr Taylor, once you are you arrived in Nigeria, your good

1 friend President Obasanjo felt it necessary to impose conditions
2 on your asylum in his country, did he not?

3 A. Well, I was given an asylum document and I just figured it
4 was - you know, most asylums do cover some of these - at least
10:28:41 5 most of the conditions for my security and other things, to the
6 best of my knowledge.

7 Q. So it was your understanding that you were in a position of
8 asylum in Nigeria, yes?

9 A. No, that was not my understanding. I never requested
10:29:00 10 asylum, I have told this Court. When I arrived, I don't know
11 what other - what led to him describing it as an asylum. But
12 basically, I raised the issue and I was told by him that these
13 were just normal things. I had never gone into asylum before in
14 that way, so I did not put anything to it.

10:29:30 15 Q. And if we can look at MFI-297, please, and if we could look
16 at what would be the second page of that document, "Obligations
17 of former President Taylor". And we see here, Mr Taylor, that
18 your good friend felt it necessary to require that you agree that
19 you would obey and conform to laws and regulations as well as
10:30:30 20 measures taken for the maintenance of public order in Nigeria;
21 yes?

22 A. Yes, that's normal.

23 Q. And that you would abstain from my subversive activities
24 against Nigeria?

10:30:42 25 A. That's normal, yes.

26 Q. And that you would desist from any act likely to cause
27 tension or hatred or disharmony in Nigeria, yes?

28 A. Yes.

29 Q. And also that you would refrain from active participation

1 in political activities in Liberia while you were in Nigeria,
2 yes?

3 A. Yes.

10:31:06

4 Q. That you would avoid mounting or instigating military
5 incursions into Liberia, that was one of the obligations, yes?

6 A. Yes.

7 Q. That you would eschew any form of propaganda and
8 cross-border broadcast to Liberia from Nigeria, yes?

9 A. Yes.

10:31:21

10 Q. That is the next page of that document. And that you would
11 be responsible for the conduct of members of your household and
12 entourage?

13 A. That is correct, yes.

14 Q. And that you would eschew interviews on local and
15 international media, yes?

10:31:40

16 A. Yes.

17 Q. And he also imposed certain restrictions on your stay in
18 his country, isn't that correct?

19 A. Yes.

10:31:48

20 Q. That you would refrain from active participation in the
21 political evolution activities concerning Liberia, yes?

22 A. Yes.

23 Q. And that you would refrain from communications with any
24 individuals engaged in political, illegal or governmental
25 activities in Liberia, yes?

10:32:07

26 A. Yes.

27 Q. And that you would refrain from giving media interviews
28 without the agreement of the Government of Nigeria?

29 A. Yes.

1 Q. That you would not leave the city limits of Calabar without
2 first obtaining clearance from the appointed liaison officer,
3 yes?

4 A. Yes.

10:32:29 5 Q. And that you would have to provide details of the proposed
6 duration of your absence from the city, yes?

7 A. Yes.

8 Q. Your itinerary, correct?

9 A. That is correct.

10:32:40 10 Q. And other relevant contact details?

11 A. That is correct.

12 Q. And if we look at the last page, number 4, just above
13 documentation, the conditions of asylum does not include
14 sovereign immunity, yes?

10:33:06 15 A. That is correct.

16 Q. And that you and your household must abide to live in
17 Nigeria as private citizens, correct?

18 A. It's just coming up on the screen now.

19 Q. I am sorry, Mr Taylor. It's number 4?

10:33:24 20 A. That is correct.

21 Q. Mr Taylor, we suggest to you that, contrary to what you
22 have told this Court, President Obasanjo imposed these conditions
23 on you because he was aware that in fact you had interfered or
24 meddled in the on-goings in other states?

10:33:54 25 A. Nonsense. Total nonsense.

26 Q. And that he was concerned you would meddle in what was
27 happening in Liberia after you left?

28 A. Total nonsense, no. I did not have to go to Nigeria and
29 what I mean by nonsense, it's total nonsense, no one - I did not

1 expect to behave as the President of Nigeria and everything that
2 Obasanjo asked of me here while they were done, I did interviews
3 in Nigeria. I travelled from place to place in Nigeria. I
4 interacted with people in Nigeria. Because of the threats that
10:34:37 5 were made against me, Nigeria provided extensive security and one
6 of the reasons why they wanted me to inform them was that they
7 would provide adequate security for me. I visited President
8 Obasanjo dozens of times. And so to suggest that Obasanjo,
9 except you are in his head, would put these because he knew I was
10:35:04 10 meddling, as you call it, in other states I think is utter
11 nonsense.

12 Q. And these interviews that you gave while you were in
13 Nigeria, before you gave these interviews, you received the
14 agreement of the Government of Nigeria?

10:35:17 15 A. Which is normal. You don't go into a country and begin to
16 speak and speak and speak. Nigeria had a close working
17 relationship with Liberia and one of the things that I need to
18 help with in your question is that the negotiations in Accra were
19 conducted by my government, the peace agreement in Accra was
10:35:38 20 signed by my government. So no one expected to go to Nigeria and
21 act as though Nigeria had a belligerent attitude against the
22 Liberian government. I spoke to my family and friends in
23 Liberia. Nigeria never obstructed the process. So I would just
24 say that what Nigeria in my opinion was trying to do at that
10:36:05 25 particular time was trying to make sure under normal asylum
26 provisions that they would meet up with the standards that had
27 been set. That's how I interpret it, because there were no real
28 restrictions set on me in Nigeria.

29 Q. Mr Taylor, you just told the Court that the peace agreement

1 in Accra - excuse me, that the negotiations in Accra were
2 conducted by your government, yes?

3 A. Of course.

4 Q. If we could go back to MFI-299, please, and if we could go
10:36:58 5 to that same page, the fifth page. If we see again looking on
6 the right, the top paragraph, and if we go down three lines,
7 beginning, and this is President Kufuor talking to the New
8 African, "Five African Presidents, he said, were meeting in Accra
9 to find ways of kick-starting the Liberian peace process, and
10:37:35 10 Mr Taylor had been invited as President of Liberia."

11 So actually, Mr Taylor, you were an invitee to this meeting
12 where these others were trying to find a way to kick-start the
13 peace process. That's the truth of it, isn't it, Mr Taylor?

14 A. That's not the truth of it. I think your team needs to do
10:37:56 15 some work, I learned counsel. The peace agreement in Accra was
16 signed by the Government of Liberia, by LURD and by MODEL.
17 Signing for my government was Lewis Brown. My government
18 negotiated Accra. LURD, MODEL signed. If your team goes and
19 gets its work done and brings that agreement from Accra, you will
10:38:22 20 see the Government of Liberia in the transitional government,
21 I learned counsel, headed by Gyude Bryant, my government and my
22 officials were represented as parties to Accra. So they better
23 do their work.

24 Three parties signed Accra: The Government of Liberia;
10:38:41 25 LURD; and MODEL, I learned counsel. My government headed - my
26 delegation was headed by Lewis Brown who later became Foreign
27 Minister for Moses Blah. Now, if you get Accra that led to the
28 transitional government headed by Gyude Bryant, you will see that
29 my government, LURD and MODEL were parties. That is factual.

1 And if they do their work they will find that out. I am not
2 misleading this Court, not to the least. I think they haven't
3 done their homework.

10:39:17 4 Q. Mr Taylor, at the time of the transitional government you
5 no longer had a government in Liberia, did you? You were in
6 exile in Nigeria.

7 A. Well, counsel, my government negotiated. I resigned, my
8 team remained there and the officials that remained were all
9 government - all officials. It was called the Government of
10:39:37 10 Liberia and that Government of Liberia at the time was the
11 Charles Taylor's government. I left that process two weeks after
12 it was signed. The head of my negotiating team, headed by Lewis
13 Brown, who is alive and well in Monrovia right now, signed on
14 behalf of my government.

10:39:55 15 Q. Now let's get back to the situation here. These
16 negotiations on 4 June in Accra, you were an invitee to those
17 negotiations, weren't you, Mr Taylor?

18 A. We are dealing with the newspapers. There were no
19 negotiations going on in Accra by the 4th. The negotiations had
10:40:14 20 not started. What happened, ECOWAS - the chairman of ECOWAS
21 invited other Heads of State and myself to find a way of getting
22 the peace process really going. This is what the description
23 here is being talked about. That's the description.

24 Q. So the description here, Mr Taylor, is that five African
10:40:43 25 Presidents were meeting in Accra to find ways of kick-starting
26 the Liberian peace process and Mr Taylor had been invited as
27 President of Liberia?

28 A. Yes. You see the language --

29 Q. That's what President Kufuor said, do you accept that?

1 A. Yes. Kufuor is saying that five Presidents were there.
2 Would you say that the President of South Africa was a party to
3 the agreement? Would you say he was a party to - the five Heads
4 of State, the way we conduct business over there, Thabo Mbeki was
10:41:14 5 present, he is all the way from Southern Africa. I was called
6 in. Kufuor was there. Tejani Kabbah there. Was Kabbah a part
7 of the Liberian peace process? No. It was an ECOWAS meeting,
8 I learned counsel. The Heads of State were called in. I was
9 invited, that's the language diplomatically they use. I was
10:41:35 10 invited to that meeting to see how things could be done. That's
11 what he is talking about.

12 Now, how this newspaper man describes it, he is not lying.
13 I was invited because I am a part of the process. But these
14 Heads of State were there to talk about - we were there to talk
10:41:53 15 about what to do at that particular time. And I gave the
16 solution, "Okay, guys, I will step down." With the worst of
17 times with Obasanjo - with the worst of times with Obasanjo, all
18 that he did to me, Obasanjo would never, never tell the world
19 that Charles Taylor did not offer to resign. Neither will
10:42:11 20 Kufuor. How it's described here is different, but I can tell
21 you, 100 per cent, I volunteered to resign. And this process was
22 just Heads of State meeting to consult on what to do. That's
23 what is being described here.

24 Q. And you volunteered to resign after they took the
10:42:31 25 initiative to convince you to do that?

26 A. No, I learned counsel. No.

27 Q. Now, Mr Taylor, you said that while you were in Nigeria you
28 travelled about. Each time that you travelled about and left
29 Calabar, did you obtain clearance from the appointed liaison

1 officer?

2 A. No. The President of Nigeria sent an aircraft for me
3 aircraft for me every time. The appointed liaison was the
4 governor of Calabar. They would provide an aircraft for me to
10:43:06 5 wherever I wanted to go, or transportation. So it did not
6 require a clearance. I did not get a clearance, so to speak. If
7 I wanted to go somewhere I said I wanted to go. If it was a
8 distance, they would give me an aircraft. If it was a short
9 distance, they would give me additional security or transport.

10:43:28 10 Q. Did you provide details of the proposed duration of your
11 absence on each of these trips?

12 A. Yes, I would inform the governor I might be away for three
13 days, four days, one day. Yes, I would do that.

14 Q. Did you provide the itinerary?

10:43:45 15 A. Not necessarily, no, because there would not be any big
16 deal about itinerary, no.

17 Q. Did you provide contact details?

18 A. Yes, yes. I would tell them who I am going to see.

19 Q. During this time you were in Nigeria, did you ever travel
10:44:00 20 outside of Nigeria?

21 A. No, I did not. I did not ask to travel outside of Nigeria,
22 no.

23 Q. And when you travelled outside of Calabar were you always
24 accompanied by a Nigerian escort officer?

10:44:20 25 A. Well, not officer. I had assigned to me Secret Service
26 personnel of the Nigerian government. And wherever I went, there
27 would be - for my security there were several Secret Service
28 personnel that always accompanied me. Several of them, along
29 with my own security personnel. My security personnel were in

1 Nigeria, they were also armed, they carried a side arm, along
2 with the Nigerian Secret Service, yes.

3 Q. Now, Mr Taylor, if we could turn to another topic. You
4 have told this Court about your escape from jail in the
10:45:04 5 United States and then your subsequent travels and events. Now,
6 in relation to your escape from jail in the United States you
7 testified that you had told your wife at the time, Tupee I
8 believe was her nickname, to sell some land you had in New
9 Hampshire so you would have money when you got out of jail, yes?

10:45:26 10 A. Is there a reference? You need to help me.

11 Q. Do you remember telling the judges that, Mr Taylor?

12 A. Well, let's see the reference. Are you making a reference
13 to a statement I made before the Court.

14 Q. Mr Taylor, do you remember telling the judges that?

10:45:37 15 A. Well, if you are referring to a statement, I would like to
16 see the reference.

17 Q. First of all, we have a right to ask you - and I am asking
18 you - do you remember telling the judges that?

19 A. I need a reference of a statement that I have made before
10:45:55 20 this Court.

21 PRESIDING JUDGE: Mr Taylor, that is a reasonable question.
22 You either remember or you don't remember. Could you please
23 answer the question.

24 MS HOLLIS:

10:46:04 25 Q. Would you like me to repeat the question, Mr Taylor?

26 A. Please do.

27 Q. In relation to your escape from jail in the United States,
28 you told the judges that you had told your wife at the time,
29 Tupee, to sell some land that you had in New Hampshire so you

1 would have money when you got out of jail. Do you recall telling
2 the judges that?

3 A. Well, yes, yes, to an extent. I am not sure of the exact
4 words, but yes.

10:46:32 5 Q. Where did you get the money to buy that land in New
6 Hampshire?

7 A. Where did I get it? I got that money when I was in
8 government. I worked for the Liberian government.

9 Q. So this was money you brought to the United States?

10:46:46 10 A. I bought the land while I was in government.

11 Q. So you were still in Liberia when you bought the land in
12 New Hampshire?

13 A. That is correct.

14 Q. And you talked about the circumstances surrounding your
10:46:55 15 escape from jail in the United States. And when you were telling
16 the judges about the circumstances, you told them that some type
17 of secure car was used in your escape. Yes?

18 A. I would assume that it was secured, yes. I said that, yes.

19 Q. And your assumption was that it was a government car?

10:47:18 20 A. This is my assumption, yes.

21 Q. And that there were two men involved that you hadn't met
22 before, you never saw them again?

23 A. Two men in the car, yes, that is correct.

24 Q. Now, you also told the Court that while you were in jail in
10:47:39 25 the United States, that you were being briefed on the planning
26 for this 1985 Quiwonkpa coup attempt. Do you remember telling
27 the judges that?

28 A. When you say you were being briefed, I don't remember
29 telling the judges that I was being briefed. I remember saying

1 that I was briefed on one occasion. But when you say being
2 briefed, it was not a continuous situation, no.

3 Q. You told the judges that you actually were able to have
4 phone contact with General Quiwonkpa --

5 A. That's correct.

6 Q. -- but he was unable to go into details with you?

7 A. Correct, yes.

8 Q. And that he sent someone to the jail to tell you what was
9 going on, and that was Mr Harry Nyuan?

10:48:27 10 A. Nyuan, that is correct.

11 Q. Nyuan?

12 A. That is correct.

13 Q. And Mr Nyuan is a Liberian?

14 A. That is correct.

10:48:34 15 Q. Mr Taylor, Thomas Quiwonkpa was a very popular leader in
16 Liberia, wasn't he?

17 A. Yes. I would say so, yes.

18 Q. And he had a great deal of support among Liberian people?

19 A. I would say so, yes.

10:48:51 20 Q. And he was also very well liked by the international
21 community?

22 A. Well, yes.

23 Q. And in fact, when you later began to build the fighters who
24 would attack Liberia, you built on his organisation when

10:49:16 25 developing your own. That's correct, isn't it?

26 A. Well, it depends now, counsel. When you say I build on his
27 organisation, I am not sure that is totally correct, because I
28 did not use his personnel. To the extent that I told this Court,
29 we used the name of the organisation, I would agree with you on

1 that. When you say build on his organisation, not in terms of
2 personnel, nothing. We chose the name that had been used because
3 it stood for something. To that extent I would say yes.

10:49:55 4 Q. And you used your association with Thomas Quiwonkpa to help
5 you to recruit fighters to eventually attack Liberia. That's
6 correct, isn't it?

7 A. Not necessarily, no. I wouldn't say that, because I did
8 not use my association with him to recruit, no.

10:50:14 9 Q. Now, you testified that you escaped from the jail in
10 Massachusetts, the Plymouth County House of Correction, in
11 November 1985. Do you remember telling the judges that?

12 A. Thereabouts, yes.

13 Q. And you told the judges that the escape was about two or
14 three days before General Quiwonkpa's attempted coup in Liberia?

10:50:33 15 A. To my recollection, yes, that's about right.

16 Q. And that attempted coup took place in November 1985, yes?

17 A. Yes, I would put it to that, yes.

18 Q. In fact, it was around 12 November 1985 that that coup
19 attempt took place; isn't that correct?

10:50:57 20 A. Well, I'll take your word for that, yes.

21 Q. And of course, that was unsuccessful?

22 A. That is correct.

23 Q. And as a result, Thomas Quiwonkpa was captured, horribly
24 tortured, and killed?

10:51:08 25 A. That is correct.

26 Q. Now, Mr Taylor, your story about your escape from the jail
27 is not entirely accurate, is it?

28 A. Well, for me, that's the story that I know. Maybe you know
29 it differently, but it's accurate.

1 Q. In fact, Mr Taylor, you escaped from that jail two months
2 before the coup attempt, did you not?

3 A. That is totally, totally incorrect.

10:51:45

4 Q. You escaped from that jail in September 1985. That's
5 correct, is it not?

6 A. Well, if my escape is in September 1985 then Quiwonkpa did
7 not stage the coup, because I was still in New York when
8 Quiwonkpa was captured. The coup was ongoing. So there were a
9 matter of days. Maybe the date of the coup in November, maybe
10 you're wrong date, but I can't be concern. But what I'm dead
11 certain of is that I remember I was still in the New York area
12 when General Quiwonkpa was captured. So it is during that period
13 of the coup that I left Plymouth.

10:52:04

14 Q. The reality is, Mr Taylor, that you in fact had two months
15 to travel to Africa and take part in that coup, didn't you?

10:52:23

16 A. That is totally, totally, incorrect. I don't know the
17 basis, but totally, totally, totally, incorrect.

18 Q. Why didn't you take that two months to travel to Liberia?
19 Were you afraid to be involved in the actual fighting?

10:52:43

20 A. No, I am not a coward, counsel, no. I am not a coward.
21 I'm not a coward. No, no, that's not the case. That's totally
22 no.

23 Q. Had you given the plans away to the Doe government?

10:53:04

24 A. Oh, counsel, no. No. Far from it. Doe was an enemy of
25 mine. Why would I give - no, no, no, no.

26 Q. Now, Mr Taylor, you have indicated that you were told that
27 the CIA was actually involved with Mr Quiwonkpa's group in
28 planning this coup. That's what you told the Court, yes?

29 A. I told them that, and I told them they paid for the

1 weapons. That's what I said, yes.

2 Q. Now, did you pass on to the United States government any of
3 the details that Mr Nyuan was giving you about the coup?

4 A. No, I did not.

10:53:40 5 Q. Mr Taylor, did you fail to travel to Liberia during this
6 two month time because you knew if Mr - that is to say, General
7 Quiwonkpa was successful, he would be in power in Liberia for a
8 very long time?

9 A. No, counsel, I - oh, God knows, I hope I had been there.
10:54:01 10 If I had been in the area, I think he would have succeeded. I
11 regretted very much that I could not have been there, because I
12 think if I had been there, to a great extent he would have
13 succeeded.

14 Q. He would have been in power in Liberia for a long time,
10:54:19 15 wouldn't he, this popular son of Liberia?

16 A. I don't know - I don't - I can't say if he would have been
17 there a long time because for me, I would - if I had been a part
18 of it, I can say I would not have encouraged any long stay
19 because what I always wanted was for Doe - and I would have said
10:54:43 20 that to him. "You are a national hero. You have done it."

21 Maybe he could participate in elections, but follow the
22 constitution. So long - I doubt if I would have advised him to
23 be long. But the constitution of Liberia and the term of the
24 presidency, I would not attribute to being long term. So I would
10:55:04 25 have discouraged it.

26 Q. If Mr Quiwonkpa had been in power for a long time, that
27 would have frustrated your own political ambitions, would it not?

28 A. Oh, no, counsel, no. I wouldn't say that. I would say
29 Quiwonkpa was a friend. He was a friend of mine, and that would

1 have - no, no, you - I did not have this blind ambition to become
2 President of Liberia that I would have tricked him into - or
3 forced him out. No, no, no. Quiwonkpa was a brother and a
4 friend. Very, very, very close. I mean, I was with him from day
10:55:42 5 one of the coup in 1980. No, no, counsel. Your suggestion is
6 far off. No, I would not, not because of any - not quoting you
7 directly - blind ambition for the presidency that it would
8 frustrated me. No, I would disagree, counsel.

9 Q. Mr Taylor, after this mysterious escape from jail in
10:56:07 10 United States, were you working as a CIA agent?

11 A. Never. There is no amount of money that I could ever be
12 paid to work as an agent for a foreign government. None.

13 Q. Were you providing information to the CIA?

14 A. No.

10:56:23 15 Q. Were you providing information to any organ of the
16 United States government?

17 A. No. Not at all, no.

18 Q. Now, you said that some time after your escape you made
19 your way to Mexico, and from there you travelled to Ghana, West
10:56:42 20 Africa. Do you recall telling the judges that?

21 A. Yes, I do.

22 Q. Now, once you were back in Africa, were you acting as an
23 agent for the CIA?

24 A. Not at all, no.

10:56:51 25 Q. Were you providing information to the United States?

26 A. No, not at all.

27 Q. Were you giving information about what these other groups
28 were doing in the area?

29 A. No.

1 Q. While you were in Burkina Faso, were you acting in any way
2 as an agent for the CIA?

3 A. No. Not at all, no.

10:57:16

4 Q. Were you passing on information about what was happening in
5 Burkina Faso to the United States government?

6 A. No. No.

7 Q. And while you were in Libya, were you an agent of the CIA?

8 A. Never. No.

9 Q. Were you giving the United States government information?

10:57:35

10 A. No.

11 Q. During the time you were in the Ivory Coast before you
12 attacked Liberia, were you an agent of the CIA at that time?

13 A. No.

10:57:49

14 Q. Were you passing on information to the United States
15 government?

16 A. No.

17 Q. And after you attacked Liberia, were you working as an
18 agent of the CIA?

19 A. No.

10:58:00

20 Q. As a source for the CIA?

21 A. No.

22 Q. At any time did you act as a source for the CIA?

23 A. Personally, no.

24 Q. Did those of your subordinates to your knowledge act as
25 sources for the CIA?

10:58:17

26 A. Yes, at some point. At some point the organisation
27 provided some information to the CIA, yes.

28 Q. Who provided that information?

29 A. Well, the - we had an organisation at that particular time.

1 It was a coordinated effect at that particular time. I am not
2 sure, counsel, as to whether you want to get into the details.
3 But if you choose to, I will go into the details. At that
4 particular time, it depends on - I am not sure if the information
10:59:03 5 at that time that was being provided and counter-information as
6 to whether - that is declassified at this time. I have no idea.

7 Q. I am not asking information, Mr Taylor. Who was it who
8 provided - who acted as a source?

9 A. Yeah, but if I give - I haven't said that there is a
10:59:21 10 source. If I begin to give you names of who are the sources, I
11 would have to give you names of who are the handlers, and I am
12 not sure as to whether that is declassified information. But if
13 I am ordered to do so, that's another matter. I am saying that
14 the NPFL at the time did provide some information, and there were
10:59:44 15 information from the CIA to us.

16 Now, I will - those that handled the information from Ia
17 Cote d'Ivoire - and on our side, I am not sure if I am authorised
18 or privileged to be specific as to names. That's what I am
19 saying to you. But we did have exchange of information.

11:00:04 20 Q. Now, this would have been with your knowledge, yes?

21 A. That is correct.

22 Q. And you would have authorised this?

23 A. That is correct.

24 Q. And when did this happen?

11:00:14 25 A. This happened mostly in 1990 and I would say through '91.

26 Q. And on how many occasions did this happen?

27 A. I would say there was an ongoing contact between that
28 period. Many times, I would say.

29 Q. So at this time you were working with the CIA?

1 A. No, I was not working with the CIA, no. I would say that
2 at that particular time if you say the NPFL and the CIA exchanged
3 information on certain crucial matters, yes.

11:01:12 4 Q. So your NPFL, with your knowledge and your authorisation,
5 gave information to the CIA during 1990 and 1991. Is that
6 correct?

7 A. Concerning operations, yes.

8 Q. And were they concerning your operations or other
9 operations?

11:01:29 10 A. Well, they were mostly internal to the Liberian operations.

11 Q. Now, Mr Taylor, during the time that you were President of
12 Liberia, were you an agent for the CIA during that time?

13 A. Never.

14 Q. Were you a source for the CIA?

11:01:55 15 A. Are you speaking personally or are you speaking - when you
16 say as President of Liberia, are you talking about my government
17 or are you talking about me personally? Please help me.

18 Q. You.

19 A. No, never. No amount of money, no.

11:02:05 20 Q. During the time that you were President of Liberia, was
21 anyone in your government, to your knowledge, working as an agent
22 of the CIA?

23 A. Not to my knowledge working as an agent for the CIA, no.

24 Q. Was anyone in your government, to your knowledge, working
11:02:25 25 as a source for the CIA?

26 A. Well, the best way to answer this as I would put it, the
27 Government of Liberia associated in so many ways in the exchange
28 of information and intelligence with the CIA.

29 Q. And during what time period would that have been?

1 A. Throughout my presidency.

2 Q. So throughout your presidency, your government, with your
3 knowledge, would have been providing information to the CIA?

11:03:07

4 A. Well, I said, counsel, my language is that there was an
5 ongoing, working relationship with the CIA and other intelligence
6 agencies. That is normal for governments.

7 Q. And you talked about an exchange of information, Mr Taylor.

8 A. Of course.

11:03:21

9 Q. So I ask you again: During the time you were President,
10 with your knowledge, were members of your government providing
11 information to the CIA?

12 A. During the time, I would say - again I am not trying to be
13 rowdy about this. When you say members of my government, during
14 the time of my presidency an agency of the Liberian government,

11:03:43

15 because not all - when you say members I look at it as
16 individuals. An agency of the Liberian government provided for
17 and received information from the CIA and many other intelligence
18 agencies, yes.

19 Q. Well, it would have been an individual or individuals
20 within that agency that actually would have done that, yes?

11:03:59

21 A. I would agree, counsel. I don't know which ones, but I
22 authorised the agency to cooperate. Now who dealt - yes, I
23 wouldn't fuss with you about that. I would say yes.

24 Q. Mr Taylor, while you were the leader of the NPFL, were you
25 briefed on the kind of information that your subordinates were
26 providing to the CIA?

11:04:15

27 A. Yes, I was briefed, yes.

28 Q. And while you were President of Liberia, were you briefed
29 on the kind of information that individuals within a certain

1 agency were providing to the CIA?

2 A. Yes, there would be intelligence briefings to me, yes.

3 MS HOLLIS: Mr President, we would note that for this area
4 of inquiry as well as the prior area of inquiry relating to Accra
11:04:54 5 that the Prosecution has materials that would have been used, but
6 for the pending formal submissions and the decision on those. We
7 simply want to make a record of that, Mr President.

8 PRESIDING JUDGE: Yes. That notation is now on the record,
9 Ms Hollis.

11:05:10 10 MS HOLLIS: Thank you, Mr President:

11 Q. Mr Taylor, do you recall telling the judges that the first
12 time you went to Voinjama was toward the last quarter of 1991 and
13 that was the only time that you went there?

14 A. That is correct.

11:05:31 15 Q. Do you recall telling them that?

16 A. That is correct.

17 Q. And that is still your recollection today?

18 A. That's my recollection today.

19 Q. Now, Mr Taylor, you are aware, are you not, that two of
11:05:42 20 your own witnesses will say you went to Voinjama in March 1991?

21 A. Two of my own witnesses will say?

22 Q. Yes.

23 A. I don't know how you can ascertain that two of my witnesses
24 will testify on an issue that they have not testified on yet
11:06:04 25 before this Court, but I would be very much interested in knowing
26 how would you, the Prosecutor, even first of all identify who my
27 witnesses will be to tell me what they will say.

28 Q. That's fair, Mr Taylor. You understand that your Defence
29 team had to provide us with summaries of what your witnesses will

1 testify to when they come to court. You're aware of that, yes?

2 A. I am aware of that.

3 Q. Now, of course, we don't have the names of those witnesses,
4 but we do have the DCT numbers and we have the summaries, yes?

11:06:43 5 A. Well, I cannot comment, counsel. I cannot comment on the
6 testimony of a possible witness before this Court, as to whether
7 a witness will appear or not appear before this Court. So I'm
8 afraid unless I am instructed to comment, I will refuse to
9 comment on what a possible witness could say even if - we don't
11:07:08 10 know - there is close to 250 some witnesses. I don't even know
11 if even ten will appear or if one will appear. I have no idea.
12 That determination will be made.

13 So I cannot comment because for the protection of those
14 witnesses to even try to comment would be to disclose their
11:07:31 15 identities and there is a court order. So I'm afraid, unless I
16 am ordered, I would decline to comment. I do not know who will
17 appear.

18 Q. So, Mr Taylor, you are not aware that DCT-152 and DCT-179,
19 according to the information we have been provided, will tell
11:07:52 20 this Court that you went to Voinjama in March 1999? You're not
21 aware of that?

22 A. You are just calling numbers. I don't know one nine
23 something. I can't comment on that, counsel, to tell you out of
24 200 and some odd witnesses, I am not that good. I'm sorry. I am
11:08:10 25 not that good at being able.

26 But again, I must note for the Court that to begin to
27 comment on possible testimony, while it is your right to quote
28 based on your summary, I'm not a lawyer, but from a layman's
29 standpoint I must refuse to comment on those because I simply

1 have no idea who will finally testify before this Tribunal.

2 Q. So you are not saying you don't know that this was in their
3 summary or are you saying that you won't comment on it?

11:08:58

4 A. I am saying to you that, as specific as you are, there is
5 190 something you called, I would not know the specifics into
6 details of all of the comments made by different witnesses. But,
7 again, I am declining to get into what the possible testimony of
8 a witness could be before this Tribunal.

11:09:22

9 Q. That's fair enough. And just so you do know, Mr Taylor,
10 that was DCT-152 and DCT-179 in the summaries that were provided
11 to us. Mr Taylor, you have introduced or at least you have
12 talked about a lot of information, a lot of documents that you
13 said were part of your personal archive?

14 A. That is correct.

11:09:52

15 Q. And sometime before we even started this case, your Defence
16 counsel told the Court that the Defence team had found some ten
17 boxes or so of primary sources of materials in the Defence office
18 that was given to them by the UN mission in Liberia and that they
19 had been given an additional 15 boxes of materials that appeared
20 to be from your personal archives and Defence counsel said that
21 there were an approximate 50,000 pages in those some 25 boxes.

11:10:18

22 Mr Taylor, the personal archives that you have talked
23 about, where were those personal archives kept from the time that
24 you left Liberia in August 2003?

11:10:51

25 A. They were kept in Monrovia at a very, very safe location.

26 Q. Where were they kept in Monrovia?

27 A. They were being held for future purposes by a very close
28 relative of mine.

29 Q. Who is that?

1 A. That close relative is, I don't know where he is right now,
2 but if you want a name I can give you the name.

3 Q. Yes.

4 A. That relative is an individual called John Bracewell.

11:11:32 5 Q. Can you spell that last name for us, please?

6 A. B-R-A-C-E-W-E-L-L. I think he is now deceased since I have
7 been here. I think he is deceased.

8 Q. And where in Monrovia was that archive being kept?

9 A. His residence. He had a residence in an area called Duala
11:11:54 10 at the time.

11 Q. I'm sorry, could you spell that for us?

12 A. I think it's D-U-A-L-A. Duala is a little place just on
13 the outskirts of Monrovia. Duala. We have heard that before.
14 It's on the records.

11:12:08 15 Q. Is it actually part of the city of Monrovia or is it a
16 separate city or town?

17 A. Well, it's considered a suburb of Monrovia, Duala.

18 Q. And did your relative have all of these 25 or so boxes of
19 materials during the time that you were gone from Liberia?

11:12:31 20 A. No, but if I understand your question properly, you said
21 that ten boxes were given by - you said UN authorities?

22 Q. No, Mr Taylor. Your Defence counsel told the Court that
23 they found ten boxes of what appeared to be primary sources of
24 materials in the Defence office in Monrovia the Defence office

11:12:55 25 had been given by the United Nations. So do you have any
26 knowledge of that ten boxes of materials?

27 A. No, but your question regarded the 25 boxes.

28 Q. Yes.

29 A. And I am saying that there were only 15 boxes as the

1 Defence counsel told you that were with my relative. This is the
2 root of your question, the 15 boxes. As far as the ten boxes, I
3 am sure that the learned counsel did not deceive you if they
4 received ten boxes. But your question to me was about 25 boxes
11:13:26 5 and those that were held by my relative were not 25, they were
6 15.

7 Q. Do you have any knowledge of what was in these ten boxes of
8 materials?

9 A. That legal counsel received? From the Defence office?
11:13:47 10 Generally, but specifically, different levels of information,
11 papers, UN papers, some government - the affairs of my
12 presidency. I don't know precisely, but different categories of
13 historical work, all of that.

14 Q. In the ten boxes?

11:14:15 15 A. Counsel, the ten boxes you are asking me about that counsel
16 said they received from UN sources, I can't account.

17 PRESIDING JUDGE: Yes, Mr Griffiths.

18 MR GRIFFITHS: I hesitate to interrupt, Mr President, but I
19 note that this whole line of questioning is premised on the
11:14:36 20 proposition that I told this Court that I received from the "UN
21 mission in Liberia" ten boxes of material. I don't recall ever
22 saying that to this Court and I would like to see a transcript
23 reference which shows me saying that I received ten boxes of
24 material from the UN mission in Liberia, as opposed to finding
11:15:02 25 ten boxes of materials in our office in Monrovia, which is a
26 completely different thing.

27 PRESIDING JUDGE: Yes. I think your first - going back to
28 your original question it was in these terms, Ms Hollis:

29 "Q. And sometime before we even started this case, your

1 Defence counsel told the Court that the Defence team had
2 found some ten boxes or so of primary sources."

3 MS HOLLIS: That's correct, Mr President, and that's what
4 I've repeated to ask. It's Mr Taylor who has attributed the
11:15:41 5 source of those documents as being the United Nations. I haven't
6 said that. So maybe I can go back to that and be sure that we
7 are all talking about the same thing.

8 PRESIDING JUDGE: Did that clear up any of your objection?
9 The allegation is that the documents were found in the Defence
11:16:01 10 office.

11 MR GRIFFITHS: But the same passage continues:

12 "I found some ten boxes or so of primary source material"
13 [microphone not activated] "that was given to them by the UN
14 mission."

11:16:19 15 It's that part of the proposition that I am objecting to.

16 MS HOLLIS: Let me clear that up then:

17 Q. The office is what was given to the Defence by the UN
18 mission, Mr Taylor. Sorry to confuse you. Ten boxes were found
19 in an office that had been the office provided to the Defence by
11:16:43 20 the UN mission. Ten boxes of primary sources of materials.

21 That's how your Defence counsel described it.

22 Now, the ten boxes found in that office, my question - my
23 first set of questions have to do with the ten boxes. Have you
24 yourself reviewed those ten boxes of primary source materials
11:17:06 25 that were found in the Defence office in Monrovia?

26 A. Counsel, let me just be very specific. But I am not aware,
27 and have not been informed, of ten boxes of material that was
28 given by the UN authorities.

29 Q. Mr Taylor --

1 A. My house --

2 Q. Mr Taylor, please, that is a misunderstanding. No one is
3 saying that the UN gave your counsel ten boxes. Ten boxes of
4 materials were found in an office, the office which was provided
11:17:38 5 to your counsel by the UN. So the ten boxes of primary source
6 materials - and that's how your Defence counsel characterised
7 them - have you had a chance to review the contents of those ten
8 boxes of primary source materials? These are separate from those
9 thought to be your personal archive.

11:18:00 10 A. Well, no. We have to be very careful with this, so I am
11 going to need all help I can get from you. Because you have
12 described these materials as being primary materials that were
13 found in the office of the Defence from an office given by UN
14 activities. Now, one may begin to look at how did those
11:18:24 15 documents get into the office? It's a principal question. Were
16 they found in there as being brought in there or forgotten by UN
17 authorities? I would say, no, they were not found so I don't
18 know --

19 Q. Well, Mr Taylor, I am not asking you to speculate on that.

20 A. Very good.

21 Q. What I am asking you is have you had the opportunity to
22 review any of these primary source materials in those ten boxes?

23 A. Well, to - I would say that I have reviewed some documents
24 relating to government activities, but I have not had an
11:19:08 25 opportunity to review those - the documents contained in those
26 ten boxes in detail, no.

27 Q. Now, in terms of the 15 or so boxes of materials that
28 appeared to be from your personal archives, you have had the
29 opportunity to review those?

1 A. Yes, I have, and those were documents - to help the Court:
2 Your Honours, before I left Liberia - some two, three weeks
3 before I left, being aware of this case, I had in part had a
4 staff group go through and remove important documents that I
11:19:56 5 would consider pertinent to whatever: (1), future that I would
6 confront; and (2), for historical purposes to have those secured.
7 Because my house at the time was being guarded by peacekeeping
8 forces and I did not trust them. So, yes, counsel, to a great
9 extent, I have, if not total knowledge, I have a fairly good
11:20:22 10 knowledge of the content of the most important documents that I
11 personally want preserved for future purposes, yes.

12 Q. So it was actually you who selected the documents that went
13 into these 15 or so boxes of documents from your personal
14 archives?

11:20:40 15 A. When I say with staff, with minor assistance. A staff
16 worked on - I told them the category. I wanted UN-related
17 documents, ECOWAS-related documents, Liberian government memos,
18 and these kinds of documents. I gave them a general scope, but I
19 didn't physically go and do it one by one. But they had
11:21:01 20 generally what documents I wanted preserved for historical
21 purposes.

22 Q. And these are the 15 boxes or so of documents you are
23 talking about having been in the care of your close relative?

24 A. That is correct.

11:21:12 25 Q. And those documents were in the care of your close relative
26 in what sort of building or office?

27 A. I don't know. I don't know where he kept them. He kept
28 them from - I gave them to him and I told him that they were very
29 important. I don't know as to whether he kept them had his house

1 or where he kept them. But when I got ready for them, I had him
2 deliver them. I don't know. I was incarcerated when we
3 retrieved the documents. I can't be sure, counsel, to tell you
4 exactly where he kept them. No, I don't know.

11:21:48 5 Q. And during the time that your close relative had these
6 documents, who had access to the documents?

7 A. No one. I did not give anyone - no one had access to those
8 documents. Nobody.

9 Q. And you know this how?

11:22:04 10 A. Well, because I had to trust him. I mean, it's a matter of
11 trust. He was told the importance of those documents, and I
12 don't think - I did not send anyone there. He was specifically
13 told that those documents should only be released upon my orders,
14 and so I want to believe that he followed those orders

11:22:22 15 faithfully.

16 Q. Do you know if those documents were moved from one location
17 to another during the time before they were handed over to your
18 defence?

19 A. I am sorry, counsel, I don't know. I was incarcerated. I
11:22:43 20 was here in The Hague. I have no idea. I am sorry, I can't help
21 you on that.

22 Q. Now, when you moved to Nigeria, you were able to move
23 personal effects and family effects. Why didn't you take those
24 documents with you?

11:22:57 25 A. They were too important. I did not want to take any
26 chances. I am sure you have knowledge of my residence because of
27 the search from the Court. My residence is still just as I left
28 it. I did not move internal furniture and certain things. But
29 very, very important things that I had, I was afraid of

1 travelling with them to Nigeria. Like - because those documents
2 actually - while they were in my custody, my intent was for them
3 to be use in the future for the benefit of the people of Liberia.
4 So I did not want them out of the country.

11:23:36 5 Q. And when was it you instructed that these boxes of
6 materials be turned over to your defence?

7 A. Oh, boy. Let me see, counsel. I can remember when - I
8 don't quite remember when the new team came on, I am sorry. But
9 it was at the time that the new team came on and went and started
11:24:09 10 their investigation work that I informed them that we had
11 this - we had these documents.

12 Q. So prior that you had not informed your prior team?

13 MR GRIFFITHS: "Prior to that you had not informed" who?
14 Who could that be but his lawyers? What business does the
11:24:32 15 Prosecution have investigating what passed between a defendant
16 and his lawyers?

17 PRESIDING JUDGE: What's your response to that, Ms Hollis?

18 MS HOLLIS: These archives have been held somewhere for
19 some time, with access by whom we don't know, and they were at
11:24:50 20 some point transferred. We believe that we are entitled to
21 inquire. We are not asking about what directions. He's already
22 said that he gave directions for one set of counsel to receive
23 them. There is not any secrets here, and we want to know the
24 movement of those archives, because many documents you have
11:25:08 25 before you supposedly came from those archives. So to the extent
26 that there is a time lapse, to the extent that other people have
27 handled these archives, we have a right to inquire into that.
28 That's not a protected area.

29 PRESIDING JUDGE: Well, perhaps you should rephrase the

1 question to make sure you are not touching on lawyer/client
2 privilege. Could you rephrase the question?

3 MS HOLLIS: I can certainly try to make it clearer:

4 Q. Mr Taylor, you indicated that when this Defence team came
11:25:38 5 on board, you gave instructions that they be provided with these
6 documents. And my question to you is: Did you provide any such
7 instruction when your first team came on board?

8 A. But then, you see, that's goes right back to the same - but
9 anyway. My first team had knowledge of the existence of
11:26:05 10 documents but had at that particular time not requested the use
11 of those documents. So they had no access to those documents,
12 but they had some knowledge that at some time they could access a
13 source of documents.

14 Q. And who actually turned the documents over to your Defence
11:26:29 15 team?

16 A. I was in here. I am not sure who did - I'm not sure who
17 physically brought it in. I don't know who physically brought it
18 in. I gave instructions for the documents to be turned over, but
19 as to the person that brought it to them, I really don't know. I
11:26:44 20 am sure the Defence may be able to answer that. I was
21 incarcerated here.

22 Q. And do you know how that transfer took place? Were they
23 driven in a vehicle? Do you know how they were taken to the
24 office?

11:26:55 25 A. I have no - I am sorry, I can't help the Court with that.
26 I am sorry, counsel, I don't know. How the transfer was made,
27 under what conditions, I am sorry, I can't help.

28 Q. And so the documents that you have told the Court are from
29 your personal archive are documents from these 15 boxes of

1 materials?

2 A. Yes, a lot of these documents, they were - there are
3 about - those 15 boxes were personally picked up at the - in
4 fact, some of those documents that I even missed, even the first
11:27:39 5 Defence team, upon investigative work at my house, even recovered
6 some documents that they considered pertinent. Apparently, I was
7 not able to even extract the entire archives, but the important
8 ones, especially the new document - the Court, the Special Court
9 for Sierra Leone conducted the first search of my house and even
11:28:06 10 could have recovered some documents that are in your possession.
11 So - and those probably could be pertinent to this case that - I
12 mean, we haven't seen all of them, I think. This Prosecution has
13 told this Court that those documents are still under seal by the
14 Court in Liberia. So in direct answer to your question is that
11:28:34 15 all of the documents that you have seen here, or at least most of
16 them, were a part of the 15 boxes that we were able to extract.

17 Q. So if I understand you correctly, there are 15 boxes of
18 these archives that you had given instruction be collected before
19 you left, those were given to a close relative. Now, is it
11:29:01 20 accurate that you said that --

21 PRESIDING JUDGE: Mr Taylor, could you give an answer that
22 can appear on the record? I saw you nodding.

23 THE WITNESS: Oh, I am sorry, your Honours.

24 PRESIDING JUDGE: It's very difficult for that to be
11:29:12 25 recorded.

26 THE WITNESS: Yes. Go ahead, counsel?

27 MS HOLLIS:

28 Q. So that's yes?

29 A. No, no, no. I mean no, counsel. Let me see the question.

1 What's your question?

2 Q. Let's go back to it, Mr Taylor.

3 A. Okay.

4 Q. And I am sorry for not reminding you to speak onto the
11:29:28 5 record.

6 Your testimony was that there were about 15 boxes of
7 materials that were collected and boxed at your direction before
8 you left Liberia in August 2003, yes?

9 A. That is correct.

11:29:41 10 Q. And those were given to a close relative?

11 A. That is correct.

12 Q. And now you indicated that your - I think you indicated
13 that your first Defence team actually recovered some additional
14 documents for you; is that correct?

11:29:56 15 A. That is correct.

16 Q. And those documents were not part of the 15 boxes?

17 A. To the best of my recollection, no. They form additional
18 documents that were mostly Liberian government type documents.

19 Q. And could you identify which of the documents had been
11:30:20 20 marked for identification came from this second group, which of
21 the ones were collected by your first Defence team from your
22 house?

23 A. No, I can't. What I can say to you, counsel, is this: The
24 15 boxes of documents that came from my personal archives, most
11:30:44 25 of the UN documents, the ECOWAS documents, other than those that
26 we recovered from the ECOWAS secretariat, United Nations
27 documents and different things, were some of the important
28 documents that the team selected from my residence. And that's
29 the content that we have.

1 Now, in truthfulness to the Court, I can say that documents
2 also from my archives from my house that were not a part of those
3 15 boxes, okay, were mostly Liberian government type letters.
4 But the important documents relating to international
11:31:28 5 organisations, United Nations, ECOWAS, and all of that, were a
6 part of the 15 boxes that I wanted to make sure were preserved
7 for historical purposes.

8 Q. And do you recall --

9 PRESIDING JUDGE: We are just about out of tape, Ms Hollis.

11:31:45 10 So we will take the short adjournment and we will resume at
11 12 o'clock.

12 [Break taken at 11.30 a.m.]

13 [Upon resuming at 12.00 p.m.]

14 PRESIDING JUDGE: Yes, please go ahead, Ms Hollis.

12:02:19 15 MS HOLLIS: Thank you, Mr President:

16 Q. Mr Taylor, did you tell us before the short adjournment
17 that your close relative Mr Bracewell had died?

18 A. To the best of my knowledge, yeah, I think John is dead.

19 Q. Do you know when that happened?

12:02:33 20 A. I don't know.

21 Q. Do you know if it was before or after the materials were
22 handed over to the Defence?

23 A. I'm not too sure. I'm told that he's dead, but I don't
24 know when he died really.

12:02:47 25 Q. Thank you, Mr Taylor. If we could please turn our
26 attention to MFI-264S. It is a hand-drawn diagram. Now,
27 Mr Taylor, for these questions it might be helpful if you could
28 actually move over so that you're in front of the overhead
29 projector there.

1 A. Okay.

2 Q. And if that could please be moved on the overhead so that
3 the front of the White Flower compound is shown. Thank you.

4 Mr Taylor, you remember talking about this diagram?

12:04:36 5 A. Yes, I do.

6 Q. And this is a hand-drawn diagram or map of your White
7 Flower compound in Monrovia. Is that correct?

8 A. That is correct.

9 Q. Mr Taylor, while you lived there at the White Flower
12:04:50 10 residence, did you also have residences in Gbarnga and
11 Arthington?

12 A. Yes.

13 Q. But you didn't live in those full-time?

14 A. Neither of these full-time. Even this.

12:05:03 15 Q. While we're looking at this diagram, if we're looking at
16 the front of it, there's Tubman Boulevard. There is a circular
17 driveway. While we're looking at it here, could you give us a
18 north/south and east/west orientation for this diagram? In other
19 words, let's say, Mr Taylor, as we look at the driveway and then
12:05:32 20 we look to the left toward Monrovia, can you tell us what
21 direction that is?

22 A. I would say that would be - I would put it to northwest.

23 Q. Northwest?

24 A. Looking at the diagram, facing my house, that would be -
12:05:57 25 this side, I would put it northwest.

26 Q. So toward Monrovia would be northwest?

27 A. Yeah. Depending on the curve, yes. Monrovia would be -
28 because you're driving from my house back this way, so we're
29 talking about - I would say west northwest.

1 Q. West northwest. And then towards Roberts International,
2 what would be the orientation then?

3 A. To Roberts, I would call that - going towards Robertsfield,
4 that would be going eastward.

12:06:40 5 Q. Okay. Then if we're looking toward the back of your
6 property, what's the orientation toward the back of your
7 property?

8 A. Again that would be north. Northeast. North.

9 Q. North?

12:06:59 10 A. I would put it north. I'm not --

11 Q. Okay, so then the orientation at the front of your property
12 would be south?

13 A. Well, no, the front of my property - again the front is
14 facing the ocean, so I would say that maybe southwest. Because
12:07:18 15 my house is facing the Atlantic Ocean, but not directly because
16 of a curve. So I would put it to southwest.

17 Q. How far is your house from the Atlantic Ocean?

18 A. Counsel, I would say - I would put it to about a half -
19 between a quarter to a half mile I would put it to, looking
12:07:46 20 straight across.

21 Q. Okay. Now, Mr Taylor, when we look at this hand-drawn map
22 or diagram, who was it who drew this?

23 A. I described this something and it was actually put - drawn
24 by lead counsel, Griffiths.

12:08:06 25 Q. And when was this drawn?

26 A. Sometime while we were preparing for this case. I don't
27 quite remember. I can't attach a date to this, but it was
28 sometimes before, I would think, the beginning of this. I would
29 - not "think". I would say before the beginning of the trial.

1 Q. And of course, this was drawn out of court?

2 A. Definitely.

3 Q. So it wasn't drawn by you in court, under oath?

12:08:44

4 A. No. I've said this was not drawn by me, counsel. I said -
5 I described this particular situation some time ago and based on
6 my description, counsel drew it. This was not done in court.

7 Q. So we really have no way of knowing if counsel suggested
8 any of this to you?

12:09:04

9 A. We have a way of knowing. I can say categorically that
10 counsel did not suggest anything to me. I can say that
11 categorically.

12 Q. So this was --

13 A. I gave the details and the drawing was done. Counsel asked
14 me, "Is this the detail?" and I said categorically yes.

12:09:16

15 Q. So the counsel drew it and asked you if it was the detail,
16 and you said yes?

17 A. I have, counsel, that I described the detail of this
18 document to the very point. As I detailed it, counsel
19 constructed it and ascertained as to whether this was in line
20 with the details that I had given him.

12:09:36

21 Q. Now, Mr Taylor, if we look at this and we look at the
22 circular driveway - you see that?

23 A. Yes, I do.

12:09:55

24 Q. And then you see this sort of squiggly line and it's
25 annotated on the right as "20-foot-high perimeter fence". Do you
26 see that?

27 A. That's to the right, counsel, is that correct?

28 Q. That's the way it's annotated.

29 A. Yes.

1 Q. There's a fence that goes around your property, yes?

2 A. That is correct, yes.

3 Q. So, Mr Taylor, the circular part of your driveway is
4 outside your fence?

12:10:14 5 A. No, the circular part of my driveway is not outside of the
6 fence, no. It is not.

7 Q. It's inside the fence?

8 A. That is correct.

9 Q. So that part of the drawing is wrong --

12:10:32 10 A. Where the - okay, yes.

11 Q. -- where the circular drive is outside?

12 A. Yes.

13 Q. So you gave your counsel incorrect details when he drew
14 that part of the diagram?

12:10:45 15 A. Counsel, I describe a situation and you lawyers, if you
16 want to say that I did not mislead my counsel, this really passed
17 me. What I was trying to get across to counsel here, the height
18 of the fence and how you enter. Now, to answer to your question
19 directly, depending on how you want to categorise it, I did not
12:11:12 20 give him misleading information. I did not mislead him. I mean,

21 I described a situation and I guess this even missed him. The
22 circle is in the fence. I guess what we're - what he's trying -
23 what we're trying to depict here is that there's a 20-foot fence
24 and there's a driveway in a circular way. Now, you lawyers have
12:11:31 25 your own way of handling it.

26 Q. We're simply looking at the accuracy of this drawing,
27 Mr Taylor. Now, Mr Taylor, can you tell us where on this drawing
28 your squash court building should be, the one that you described
29 for the Court?

1 A. Yeah, the squash court is right between the swimming pool
2 and the tennis court. It is right in here.

3 Q. Okay.

4 A. Right in this section right here.

12:11:57 5 Q. And you may recall one of the photographs that you and your
6 counsel talked about showed some buildings that were attached to
7 the wall across from White Flower. You described them as a
8 kitchen or staff buildings, do you remember those buildings?

9 A. I don't remember any picture presented to this Court with a
12:12:24 10 building attached to my wall.

11 Q. Okay. If we could perhaps look at MFI-264FF. Just keep
12 that drawing there, please, and then if we could look at 264FF.
13 Now, do you recall, Mr Taylor - see, it looks like there's a
14 stove or an oven or something sitting outside and then there's a
12:13:29 15 structure that is attached to your fence. I think you said that
16 was a kitchen or some type of service buildings.

17 A. That is correct, but let's go to your question. Your
18 question, counsel, is what I answered. If you read the
19 transcript there, your question was about a photo that I showed
12:13:50 20 with a building - with some buildings attached to my wall and I'm
21 saying, no, this is the one building. This is White Flower. So
22 your question, if you see the transcript, you see what I answered
23 to.

24 Q. This is a separate structure from your residence, isn't it,
12:14:06 25 Mr Taylor?

26 A. No, it is not. That's why --

27 Q. It's not? So, what's in between there? Is that - it looks
28 like grass.

29 A. No, no, no. Counsel, this walks - there is a walkway right

1 here upstairs into my - you go straight into my living room from
2 this kitchen, the kitchen into the family dining room. This is
3 not a detached building. May be another photo will show it
4 better. Here, what you're seeing, is not a division. There is
12:14:36 5 one building. You walk from the kitchen here, into the living
6 room, into the family dining room. This is one building. That's
7 why I answered you -

8 Q. So this is part of your residence?

9 A. That is correct, counsel. That's why I answered you that
12:14:48 10 way, yes.

11 Q. So where would that appear on your diagram? The diagram
12 can be put back on the --

13 A. Yes, the diagram shows White Flower as it should in one.
14 White Flower. That part of White Flower, the building, would be
12:15:03 15 to the left-hand side here. So White Flower refers to the one
16 building and --

17 Q. So it doesn't have it touching your fence there?

18 A. It does not show White Flower touching the fence?

19 Q. It doesn't show your extension here that touches your fence
12:15:29 20 on the diagram. Where would you put that extension that touches
21 your fence?

22 A. I mean, if you look at that way, counsel, this line - this
23 line, as showing White Flower as the building, would actually
24 touch this wall.

12:15:49 25 Q. Okay. And how much of White Flower there would touch the
26 wall?

27 A. The whole White Flower. It's one building, so if one part
28 touches it, that side would touch it. It's the building that -
29 that's just a part of the building.

1 Q. Okay. Now, Mr Taylor, across from your White Flower and
2 your fence there is something that is labelled "building". What
3 is that?

4 A. This --

12:16:21 5 Q. You see where it says "building"? It doesn't say anything
6 else. You have White Flower, you have your fence and then you
7 have "building". Yes, that structure.

8 A. Okay, this structure right here. This is a structure that
9 - I'm not sure who owns. This occurred after I left, but we were
12:16:40 10 describing it based on the picture. This is - there's a lady
11 mistress, I just know her husband, Mrs Sampay [phon], I think has
12 since constructed a building. The property - the lot here is not
13 my property.

14 Q. So you're saying that that was constructed after you left?

12:16:59 15 A. Yes. Far after I left, yes.

16 Q. And the Taiwanese embassy, was that there when you were
17 living in White Flower?

18 A. Definitely. It is owned - the property is owned by the
19 same woman that owns it here. Mrs Sampay, yes.

12:17:15 20 Q. And the embassy itself was there at the time you lived
21 there?

22 A. Yes.

23 Q. And we see the slope on the road here going down toward the
24 back of your property, yes?

12:17:24 25 A. Yes.

26 Q. Its says Taiwanese embassy and then it says slope?

27 A. Yes.

28 Q. Now, at the very back to your property, at least close to
29 the back of your property on this drawing, we have what appears

1 to be offices and warehouse. Is that right?

2 A. That is correct. Right here.

3 Q. And you're telling us that that is an accurate description
4 of offices and warehouse in relation to the rest of your
12:17:48 5 property?

6 A. Yes. In fact, for the purposes, this is the building that
7 was referred to - used by the Secret Service. This building is
8 also owned by Mrs Sampay. So we leased that building from her,
9 yes.

12:18:05 10 Q. And you have drawn that at the back of your property down
11 past your tennis court, yes?

12 A. That is correct.

13 Q. Now, Mr Taylor, that's not an accurate placement of that
14 building, is it?

12:18:20 15 A. Well, to the best of my knowledge, this building is right
16 where I say it is. It is outside of my fence on this side. It
17 is not at the back of the property. It is actually to the side
18 of the property and, quite frankly, it is a long building. This
19 is just depicting it. It does cover some part of this side of
12:18:48 20 the building. It is on the side.

21 Now, if we get into it one foot or 12 feet from this,
22 that's another issue. But it is, from my explanation and my
23 knowledge of it, it is to the side of my place, not immediately
24 to the centre of the property. It is somewhere I would say to
12:19:09 25 the second half of the property, yes.

26 Q. Actually, Mr Taylor, that building is up by your swimming
27 pool, your squash court building. That's where that building is
28 located, isn't it?

29 A. Counsel, you know, I'm not a lawyer. I'm just trying to

1 explain as I know it. Whether this thing is 12 feet, maybe it's
2 important. I explained that this building is out there. We have
3 pictures to show. Now, I accept it could be one foot or it could
4 be 12 feet from where it is. That's for this Court to decide. I
12:19:44 5 mean, I did not mislead the Court as to the proximity of this
6 building. Now, in feet, inches, yards, that's for lawyers.

7 Q. Perhaps we can look at MFI-264F. Mr Taylor, you have
8 previously identified for this Court that this white building we
9 see on the outside of your fence is in fact the building that has
12:20:27 10 your SSS offices and the warehouse?

11 A. That is correct.

12 Q. Yes. You see, Mr Taylor, that building ends before you
13 even get to your tennis court.

14 A. Counsel, I'm not fighting you over that, counsel. I
12:20:42 15 describe a building on the outside of my fence. Now, if you look
16 at the drawing from counsel, this tennis court extends from
17 there. If you really wanted to be technical, this building,
18 what, if you look at the line, it does end at where the tennis
19 court begins or thereabout. So if you really want to be - in
12:21:04 20 fact, it does not end before, if you want to get technical. But
21 this tennis court also runs almost to the end of the fence. It's
22 a long tennis court.

23 Now, maybe somewhere down the line I'm wrong and I'll be
24 willing to accept wrong, but when we get into these technical
12:21:22 25 things, really, I describe a building outside of my fence
26 because, in line with what my lawyers were trying to get with
27 this warehouse that was described, it was being described as
28 though it was inside White Flower. Now, this Court will have to
29 determine as to whether I misled it in the building being

1 outside, whether it is 10 inches below or 10 inches above, I'm
2 not going to fight with you about this.

3 Q. Mr Taylor, if we look at this picture we see that the SSS
4 building is on that slope, is it not?

12:21:56 5 A. What do you mean? This building is on a slope?

6 Q. Yes.

7 A. Which of the buildings are you referring to now? This
8 building?

9 Q. Yes, the SSS building that you just pointed to, the white
12:22:11 10 building that you said is SSS and warehouse.

11 A. This whole place is a slope. My house is on a slope. The
12 whole place is a slope, counsel. The whole place.

13 Q. So this diagram isn't accurate in some of its particulars,
14 is it, Mr Taylor?

12:22:26 15 A. Can I look at the diagram again?

16 Q. Of course.

17 A. Like I say, counsel, I hired a lawyer here. I didn't hire
18 a draftsman. And I take full responsibility. I describe a
19 situation and, quite frankly, it's my fault that I didn't tell

12:22:50 20 him you're 12 feet too high or 12 feet too low. I'm trying to
21 describe where a building is that it is the centre of this case
22 that is supposed to be - White Flower had been described to this
23 Court as my residence, rightly so, and that this warehouse was
24 supposed to be inside White Flower. So what I'm trying to depict
12:23:13 25 here for counsel is that this so-called warehouse is outside of
26 my fence. Now, maybe if I'm guilty for the number of feet and
27 yards where it is in proximity to the tennis court and swimming
28 pool, then I take responsibility, but I didn't mislead him.

29 JUDGE DOHERTY: Mr Taylor, could I clarify. On the hand

1 drawn diagram, it says office and warehouse, thereby conveying to
2 me that it's one building. When I look at the photograph, I'm
3 not clear if there's a separate or they are annexed together, the
4 warehouse and the --

12:24:00 5 THE WITNESS: Yes, your Honour. It is one building with
6 two floors. The down floor, they use it for warehouse purposes,
7 and the upstairs they use for offices.

8 MS HOLLIS: Thank you. We can remove that diagram:

9 Q. Thank you, Mr Taylor. You can resume your other seat.

12:24:31 10 JUDGE SEBUTINDE: Ms Hollis, this may or may not be
11 important, but I seem to recall when this diagram was first put
12 on the overhead during the examination-in-chief, I think counsel
13 Griffiths did warn us that this was a sketch not drawn to scale.

14 MS HOLLIS: That's correct.

12:24:50 15 JUDGE SEBUTINDE: It was a sketch not drawn to scale, and
16 so perhaps in cross-examination this could be borne in mind.

17 MS HOLLIS: There is to scale and then there is something
18 that is very different and that's what we were, of course, asking
19 about, Madam Justice:

12:25:14 20 Q. Mr Taylor, you can take your other chair. Mr Taylor, do
21 you remember telling the judges that as President of Liberia you
22 had made accusations against President Tejan Kabbah but that did
23 not mean they were factual, that both you and he had made
24 accusations against each other with no factual basis? Do you
12:25:47 25 recall telling them that?

26 A. Something to that extent, yes.

27 Q. Can you tell the Court, Mr Taylor, what accusations you
28 made against President Kabbah that were without factual basis?

29 A. Well, let me just say, that statement was made in the

1 context of all governments, all governments, make statements that
2 are practically not factual, some of them are for fact-finding
3 purposes. For example, President Kabbah accused me of amassing
4 5,000 troops on the border to attack Sierra Leone. There was
12:26:25 5 nothing factual about it. I accused President Kabbah of planning
6 a counter-offensive about me. We later got to find out that this
7 was based on information and so-called intelligence coming from
8 our areas. And so - and I see how you're going, counsel.

9 In dealing with governments and diplomacy, a lot of
12:26:55 10 statements that are made diplomatically are not factual. It
11 doesn't mean that you are lying. It is not just factual. Some
12 of it is thrown out there to get a result, and that's what
13 diplomacy is all about. Now, that's different from law.

14 Q. Mr Taylor, can you tell us what accusations you made
12:27:12 15 against President Kabbah that had no factual basis.

16 A. Well, I accused President Kabbah of mounting an offensive
17 against the Republic of Liberia based on information that he said
18 he had gotten and that he had accused Liberia of mounting an
19 offensive against Liberia. So it was a counter-argument.

12:27:38 20 Q. And that was without factual basis?

21 A. The two of us found out that they were not factual based on
22 information.

23 Q. Who had given you this information that turned out not to
24 be correct?

12:27:48 25 A. We got security agencies bring reports on all sides, just
26 like --

27 Q. Who brought you that about the counter-offensive that
28 turned out not to be accurate?

29 A. Liberian information sources, intelligence agencies.

1 Q. Which ones?

2 A. Military intelligence, sometimes ordinary intelligence.

3 You would see something that somebody is - that the Government of
4 Sierra Leone is planning to invade. So we get up and I say - I'm
12:28:17 5 accusing Kabbah of planning to invade Liberia.

6 Q. So, Mr Taylor, in relation to this counter-offensive that
7 you had no factual basis for, who gave you that information?

8 A. I said Liberian intelligence sources.

9 Q. Which intelligence sources?

12:28:31 10 A. Military intelligence.

11 Q. And which particular area would that be? What organ or
12 department?

13 A. Defence. Defence intelligence.

14 Q. And who were the people who gave you this information?

12:28:45 15 A. I don't know those people that occupied the Defence. I
16 mean, I would get it in a report. I wouldn't know who
17 contributed to the report, counsel.

18 Q. And who would the report come from? Who did this
19 particular report come from?

12:28:58 20 A. The report would come from the - it would come as a sum
21 total of briefings that come to me. When briefings get to me,
22 there may be several agencies. I get the final work, maybe two
23 or three pages, that information received shows that Sierra Leone
24 is planning an attack. So you get up and you announce it:

12:29:21 25 Sierra Leone is planning an attack against Liberia, and you'll
26 hear on the Sierra Leonean side, counsel.

27 Q. And who did you actually get your report from? Who would
28 have provided the report to you?

29 A. My national security adviser would bring in the - what you

1 would call the intelligence estimate. You know what I'm talking
2 about.

3 Q. And who would have been your national security adviser at
4 the time that you got this information about President Kabbah and
12:29:49 5 a counter-attack?

6 A. John Richardson. He was national security advisor.

7 Q. During what period of time was he your national security
8 advisor?

9 A. All the way until I left Liberia.

12:30:00 10 Q. From when?

11 A. Oh Lord, I can't remember the exact year, but he served in
12 that post for quite a few years. There were only two individuals
13 that served in that post; Lewis Brown and John Richardson.

14 Q. And when you first became President, what was
12:30:15 15 Mr Richardson's position, if any, in your government?

16 A. Yes, John Richardson was Minister of Public Works during
17 the early part of my presidency.

18 Q. And when had you first met Mr Richardson?

19 A. I would say about - I would say 1990 that - but I had known
12:30:42 20 of John many years. We grew up in Monrovia now. But we finally
21 got together in, I think, about 1990, counsel.

22 Q. And was he one of your NPFL commanders?

23 A. No, no, no. John was never a commander.

24 Q. What was his position?

12:31:02 25 A. John Richardson was one of, I would say, the academics or
26 thereabouts that we had that, you know, we called upon from time
27 to time to seek opinions from, but that's about it.

28 Q. So he would not have been a commander in the NPFL?

29 A. No, no, no. John was never a commander. He's not a

1 military man. No, never.

2 Q. And other than the ministerial position you've talked about
3 and being your national security adviser, did he perform any
4 other functions after you were elected President?

12:31:51 5 A. No, not - no, not at all. Minister of Public Works.
6 Thereafter he became national security adviser. That's all.

7 Q. What were his duties as national security adviser?

8 A. The national security adviser in Liberia is one who
9 coordinates the members of the National Security Council, which
10 involved the Minister of Foreign Affairs, defence, internal
11 affairs. Our Minister of Internal Affairs is what you would call
12 in other countries Ministry of Interior, okay? And the national
13 - the NSA, the National Security Agency, the national police,
14 these were all members that constituted the National Security
12:32:19 15 Council, and he was the adviser that coordinated with a staff,
16 the - what we call intelligence estimates that came from around
17 the different intelligence agencies and then summarised them and
18 presented them to the President.

19 Q. So the national security adviser would be the one who would
12:33:12 20 give you your morning briefing?

21 A. That is correct.

22 Q. And that would also include media reports that were found
23 to be noteworthy?

24 A. I would say so, yes.

12:33:23 25 Q. And do you recall exactly when it was that Mr Richardson
26 took over as your national security adviser?

27 A. I don't recall right now.

28 Q. Do you remember a year?

29 A. No, I don't recall. He was in that post for a few years.

1 I don't recall exactly when he took over.

2 Q. Mr Taylor, you've given us one example of an accusation
3 against President Kabbah for which you had no facts. What other
4 accusations did you make against President Kabbah for which you
12:33:50 5 had no facts?

6 A. Oh, I - well, you know, counsel, I can see what you're
7 talking about. When we begin to bring the dealings of
8 politicians into a courtroom, then it becomes a little more
9 serious because then I'm going to be asking for help along the
12:34:13 10 way. You're talking about two Presidents' belligerent
11 activities, accusations flowing across the borders. Now you're
12 asking me to begin to say when Kabbah and I accused each other,
13 specifically me.

14 Q. No --

12:34:29 15 A. I know what you said. Specifically me. And we're dealing
16 with a political environment where, depending on reports, there
17 could have been - most of it involved cross-border activities,
18 responses, you accuse me, I accuse you, and generally I don't
19 know what to say here in dealing with political propaganda, as
12:34:59 20 was mounted by both governments. So, I mean, it's a little
21 difficult for me to really tell you in detail. There were many,
22 many statements made by both governments. Now, I know you're
23 talking about me. I know you're going to say I'm not talking
24 about what Kabbah did. But I must say, it must be in the context
12:35:21 25 of the exchange of accusations across the border, which is normal
26 between states. So I'm sorry here, I'm not trying to mislead the
27 Court, but I think the Court must understand that the context of
28 your question is one that puts me in a position where I don't
29 want to be seen as lying to the Court, but there were several. I

1 can't recall the specifics, but there were several accusations
2 traded vice versa across the border, and it happens. It's a
3 normal situation.

4 Q. So on several occasions you made accusations against
12:35:57 5 President Kabbah for which you had no factual basis when you were
6 President of Liberia?

7 A. I would say that on a few occasions we traded
8 propagandous statements. If you want to call that whatever
9 accusations that we're trading, fine, but --

12:36:16 10 Q. Mr Taylor, I'm asking you the question and trying to
11 understand your answer. So let's try it again. You've given us
12 one example of an accusation you made against President Kabbah
13 without a factual basis, and that was talking about a
14 counter-offensive, and I'm asking you to give us other examples
12:36:34 15 of accusations you made against President Kabbah for which you
16 had no factual basis?

17 A. And I'm saying to you that I cannot recall the specifics,
18 but what I'm telling these judges is that there were many times
19 that these two governments traded barbs for which neither
12:36:58 20 government had any factual basis, and that's as far as I'm
21 prepared to go on that.

22 Q. When you say government, you mean you?

23 A. Both governments. I'm talking about the governments. I am
24 not me. I am not me. I was President of the Republic of Liberia
12:37:14 25 and cannot be divorced from that function. Everything that I did
26 was not about me. It was about my functions as President of the
27 Republic of Liberia. There is no me in my actions.

28 Q. Mr Taylor, let's go back to what you told the judges: That
29 you had made accusations against President Tejan Kabbah when you

1 were President of Liberia, but that didn't mean that they were
2 factual. So you were talking about what you as President of
3 Liberia had said about President Kabbah. You've given us one
4 example of what you have said for which you had no factual basis,
12:37:53 5 so could you please tell us other things you said for which you
6 had no factual basis?

7 A. Then again, as I listen to your question, counsel, and
8 answering you, again I must emphasise and I must re-emphasise
9 that if you try to describe me in the singular and not as me as
12:38:20 10 the President of Liberia, we lose the essence of what I'm saying,
11 then you would be led to misinterpreting what my intentions are
12 in my statements. My intentions - when I say as President of
13 Liberia I made statements, I'm speaking about the capacity as
14 President of Liberia. That's not divorced - I'm not acting
12:38:44 15 singularly. And for the Court, it must be - it has got to be
16 fair to understand the context that I'm speaking in, and the
17 fairness comes with your understanding. If the assertion is that
18 Charles Taylor deliberately made up lies against a colleague,
19 that's the context that you will drive to, that would be
12:39:12 20 unfounded, and I want to be clear to these judges. I am saying
21 as President of Liberia, that Republic in dealing with Tejani
22 Kabbah on both sides in a war and a political environment traded
23 statements that were not true, just as all governments do.
24 Presidents say that.

12:39:34 25 Q. Mr Taylor, you have given us one instance where you made an
26 accusation that was not founded. Give us other instances where
27 you made accusations against President Kabbah without a factual
28 foundation?

29 A. I cannot recall any other instances at this particular

1 time.

2 Q. So there was only the one time?

3 A. I'm not saying one. I said I cannot recall right now.

4 Q. How many times do you think you did this?

12:39:56 5 A. I can't recall the number of times. I have been very fair
6 to this Court by saying that there were a few times, several
7 times that we talked about it. I can't recall numbers and the
8 specific details, but Kabbah and I traded barbs cross the border.
9 That's the essence I'm trying to give to these fair judges, so
12:40:18 10 that's it.

11 Q. Now, as President of Liberia did you make these accusations
12 without a factual basis against other Leaders or Presidents?

13 A. No. And let's remember too, even when I speak of - as
14 President of Liberia, when the Minister of Information releases a
12:40:38 15 statement approved by the government, I'm stating that. You see?
16 You understand? When the Foreign Affairs Minister makes a
17 statement, that's me. So I'm speaking about responsibility as
18 President of Liberia. Once a statement is official from the
19 Government of Liberia, I am speaking. That's the context.

12:41:01 20 Q. Let's break it down a little bit.

21 A. Let's go.

22 Q. First of all, did you as President of Liberia make
23 allegations - excuse me, accusations - to use your word, accuse -
24 did you accuse any other Leaders?

12:41:14 25 A. No.

26 Q. Without a factual foundation?

27 A. No, not that I can recall right now.

28 Q. And as President of Liberia, did your Foreign Minister or
29 your information department, anyone who worked for you, make

1 accusations against other leaders which had no factual basis?

2 A. Counsel, that's all within the concept. The United States
3 government accused Saddam Hussein of having weapons --

4 Q. Mr Taylor, really --

12:41:48 5 A. I'm answering your question --

6 Q. No, you're not, Mr Taylor --

7 A. No - well, you will not interrupt me except the judges stop
8 me.

9 Q. Let me repeat the --

10 A. I will answer your - no --

11 Q. Mr Taylor, you answer the questions that are asked.

12 A. I will answer the question --

13 Q. And the question that was asked was this, Mr Taylor, and
14 that is: As President of Liberia did your Foreign Minister or
12:42:05 15 your information department, anyone who worked for you, make
16 accusations against other leaders which had no factual basis?
17 That was the question. Would you please answer that?

18 A. Well, I will answer your question and I will preface before
19 I answer. Accusations are traded across the world. The United
12:42:28 20 States accused Iraq of having weapons of mass destruction which
21 was not factual. So what I'm saying to you, in effect, no to
22 your answer. None of them did it. But the issue that I'm trying
23 to convey to these judges is that, when you're dealing with
24 political situations like this, these things occur all of the
12:42:46 25 time. It is happening now. These things are put out there.

26 Some of them are feelers. If it is wrong, later on it is
27 corrected. Where you are driving me that I think is unfair,
28 counsel, is you are trying to portray me here now as making up
29 lies against foreign governments that were not true and I cannot

1 accept that.

2 Q. So, Mr Taylor, your answer is that your Foreign Minister,
3 your information department, no one who worked for you made
4 accusations against other leaders that had no factual basis?

12:43:31 5 A. Well, counsel, I think I prefaced that statement with, in
6 trying to show the Court, that officials --

7 Q. Mr Taylor, would you please answer the question?

8 A. I'm answering your question, except you want me to answer
9 it your way, which you will not get.

12:43:47 10 Q. No, I want you to answer the question, Mr Taylor.

11 A. Well, I'm answering your question, if you don't interrupt.

12 Q. Let me ask you again just so we are clear, Mr Taylor.

13 A. Excuse me, your Honours, if counsel wants to bully me, that
14 will not happen, please.

12:43:59 15 PRESIDING JUDGE: Counsel is not bullying you, Mr Taylor.

16 THE WITNESS: Well, then let her answer my question.

17 PRESIDING JUDGE: Mr Taylor, you are talking at two
18 different things. Counsel is asking you a question and instead
19 of answering you're saying what you feel like saying. Now, this
12:44:13 20 whole dispute would be resolved if you just simply answered the
21 questions. You have a counsel there who will take it further in
22 re-examination if it merits that.

23 Just repeat the question, please.

24 MS HOLLIS: Thank you:

12:44:30 25 Q. Mr Taylor, did your Foreign Minister or your information
26 department or anyone who worked for you while you were President
27 of Liberia make accusations against other leaders for which they
28 had no factual basis?

29 A. No.

1 Q. So it was only against President Kabbah and you made the
2 accusation, correct?

3 A. Well, to the best of my knowledge, I would say yes.

4 Q. And it was a few or several times that you may have made
12:45:04 5 accusations against President Kabbah for which you had no factual
6 basis?

7 A. I would say a few times, yes.

8 Q. Mr Taylor, since you have been in detention, have you had
9 contact with any people who will be witnesses for you in this
12:45:41 10 trial? And don't give names.

11 A. I would say prospective witnesses, since recently when the
12 Court ordered that that was possible, I have spoken to
13 prospective witnesses.

14 Q. What do you mean when you said recently when the Court
12:46:09 15 ordered that would be possible?

16 A. Well, I think there is, if I'm not mistaken, an agreement
17 or ruling just before - I'm not sure when the ruling came out, I
18 can't be exact, but that said that I could speak to prospective
19 witnesses.

12:46:27 20 Q. So before that you had never spoken to any prospective
21 witnesses?

22 A. I was not concentrating on witnesses. I was busy
23 concentrating on my examination-in-chief.

24 Q. I'm talking about the time you've been in detention,
12:46:41 25 Mr Taylor, not just before your preparation for your testimony in
26 chief.

27 A. Well, that's what I'm saying. I have spoken to several
28 people since my incarceration and some of them turned out to be
29 looked at as prospective witnesses.

1 Q. And how many prospective witnesses have you spoken to since
2 you've been in detention?

3 A. Since I've been in detention, prospective witnesses, I
4 would just say about maybe three, five that I would consider
12:47:21 5 prospective witnesses. Some of them may not even come here, but
6 I have spoken to them.

7 Q. And when you say that you had considered prospective
8 witnesses, you mean persons whose summaries have been provided to
9 the Court and the Prosecution?

12:47:36 10 A. No, no, no. It's an ongoing process for me. No.

11 Q. So of the ones whose summaries have been provided to the
12 Court and the Prosecution, how many of those have you spoken to
13 since you've been in detention?

14 A. I would say - of the five, I would say maybe about two or
12:48:02 15 three of them.

16 Q. And these two or three, how many times have you spoken to
17 them, each one?

18 A. I would say about maybe once or twice. And it may be
19 important for your question, counsel, about I would say eight,
12:48:35 20 nine months ago, which you can check, a procedure was put into
21 place at the detention centre that the names are listed of all
22 individuals that I speak to. And so I will only say about two or
23 three of the individuals and then that process stopped several
24 months ago because I can only speak to family and a few friends.
12:49:03 25 So I'm restricted in who I speak to anyway. So I would say two
26 or three persons I have spoken to.

27 Q. So you've spoken to maybe five people that you would
28 consider prospective witnesses and maybe two or three of those
29 are included in the summaries of witnesses that have been

1 provided. Is that correct?

2 A. I am not sure. I'm not sure, but that's a possibility. I
3 would have to go and double check that. I'm not too sure,
4 counsel. I'm not too sure, but that's a possibility.

12:49:42 5 Q. I'm going to ask you to check that and tell us by DCT who
6 you've spoken to that's listed as a witness, Mr Taylor, if you'd
7 be so kind.

8 A. Okay.

9 Q. Now, as to each one of these that you said that you had
12:49:57 10 talked to them maybe once, have you spoken to any of these more
11 than once?

12 A. Yes, not - I would say, yes, maybe once, twice. But now
13 let me emphasise, not as witnesses. These are people that I
14 know. I called people and talked to them, yes, more than once.

12:50:15 15 Q. And how long have these conversations lasted?

16 A. Some of these conversations, 10, 15 minutes. Every call I
17 make is an overseas call, so it's very expensive. But in any
18 case, counsel, all conversations that are made by me at the
19 detention centre is recorded. So there is nothing that I would
12:50:39 20 discuss. Short, short conversations, counsel. Very short.

21 Q. Well, that's not actually correct, is it, Mr Taylor? When
22 you are speaking on a privileged access line, that's not
23 recorded, is it?

24 A. No, that's not recorded, but - of course it's not recorded.

12:50:57 25 Q. And those lines are supposed to be restricted to your
26 Defence counsel, yes?

27 A. To the best of my knowledge, that was not my understanding
28 that those lines were restricted only to my Defence counsel. I
29 understand they were restricted to members of the Defence team.

1 That was my understanding.

2 Q. Members of the Defence team. And you're not authorised to
3 speak with anyone else on those privileged access lines except
4 members, as you understand it, of your Defence team, correct?

12:51:31 5 A. Well, that's not my understanding. As a matter of fact,
6 counsel, I have no way of knowing who - this issue of
7 conversations with my counsel is an issue that I'm not sure that
8 I'm privileged to discuss who I talk to or when, but I speak to
9 them.

12:51:59 10 Q. And these privileged access lines are for you to have
11 communications with members, as you understand it, of your
12 Defence team. Is that correct?

13 A. That was my understanding, yes.

14 Q. But, in fact, you've spoken to people on these privileged
12:52:13 15 access lines that were not members of your Defence team, haven't
16 you, Mr Taylor?

17 A. Well, my understanding is this --

18 Q. Mr Taylor, answer the question.

19 A. -- I have spoken to individuals, prospective witnesses on
12:52:31 20 the Defence team which I have been advised is authorised, yes.

21 Q. Mr Taylor, have you spoken to them on the privileged access
22 lines?

23 A. It is authorised, yes.

24 Q. And you've done that by using Mr Supuwood's privileged
12:52:45 25 access telephone lines. Isn't that correct?

26 A. That is correct, because it was authorised.

27 Q. And how many times have you done that, Mr Taylor?

28 A. I can't recall how many times.

29 Q. And, of course, these conversations weren't recorded in any

1 way, were they?

2 A. I'm not sure what happens behind the scenes, but they are
3 not supposed to be recorded.

12:53:13

4 Q. So, Mr Taylor, if you were talking to these witnesses
5 simply to encourage them to testify, you wouldn't have to use a
6 privileged access line, would you?

12:53:30

7 A. Well, it depends. That's a subjective question. It
8 depends. I'm authorised, from what I'm told, to speak to
9 individuals, prospective witnesses on - I mean, with my counsel -
10 in the presence of my counsel, and that is all I know.

11 Q. And what if your counsel isn't present?

12 A. Well, to the best of my knowledge, counsel is present and
13 I'm authorised to do it and I do. That's how I understand it.

12:53:52

14 Q. You've actually misused those privileged access lines,
15 haven't you, Mr Taylor?

16 A. I have not.

17 Q. And, in fact, on one occasion you were supposedly speaking
18 with Mr Supuwood on one privileged access line when another
19 Mr Supuwood tried to reach you. Isn't that correct, Mr Taylor?

12:54:07

20 A. Well, in part there was a mix-up with Mr Supuwood being in
21 one room and I'm speaking to him while I'm speaking to a
22 prospective witness and then someone called me to get to him from
23 another room. That did happen.

24 Q. Using his name.

12:54:29

25 A. But the phones are his, yes, that did happen.

26 Q. So, Mr Taylor, you really didn't need to have a privileged
27 access line to get people to agree to testify for you, did you?
28 That's not something you needed to hide, was it?

29 A. Yeah, but let's get one thing clear now. Well, it depends

1 on what you think of that, counsel. My counsel calls and I'm
2 invited to speak to someone on the privileged line that is a
3 prospective witness. As far as I have been legally advised, that
4 is true. Now, to ask me as to whether I didn't need, I would
12:55:06 5 disagree. I mean, I felt a need to do it at the time. So there
6 is a need.

7 Q. Mr Taylor, it was made very clear to you that you could
8 only use those privileged access lines to communicate with
9 members of your Defence team, wasn't it?

12:55:19 10 A. No. If you have any such writing or any such notice to me,
11 I would be glad. I was never notified by the Registrar - because
12 you're speaking about information from the Registrar's office,
13 and I was never provided with any written document prior to this
14 time from the Registrar that I could not speak on counsel line to
12:55:46 15 a prospective witness, no.

16 Q. So that's what you want this Court to believe?

17 A. Well, that's exactly what I'm saying. And if it exists,
18 I'd like to see it. I was not aware of it.

19 Q. Now, Mr Taylor, when you were using these privileged access
12:56:01 20 lines to talk to people other than members of your Defence team,
21 were you asking them to testify in a certain way?

22 A. No, counsel. Are you suggesting that I would be trying to
23 plant evidence? No, I wouldn't speak to them about nothing like
24 that.

12:56:19 25 Q. Were you talking to them about giving them money if they
26 would testify a certain way?

27 A. I have no money to give anybody, no. That would be -
28 that's the job of the Prosecution. You've done that, but I
29 wouldn't.

1 Q. So you've said many times, Mr Taylor. Now, Mr Taylor,
2 would you be telling them to contact other people to try to bribe
3 them to testify for you?

4 A. Definitely not, counsel, no. Definitely not.

12:56:43 5 Q. Would you be telling them to contact other people to
6 intimidate others?

7 A. No, never, never, no.

8 Q. But you still felt the need to use this privileged access
9 line to talk to these people. Is that right?

12:56:56 10 A. Yes, for that particular time, yes.

11 Q. And that's been a long-standing practice of yours, hasn't
12 it, Mr Taylor, the use of these privileged access lines to speak
13 to people other than members of your Defence team?

14 A. No, I wouldn't say that, no. That is not - that is
12:57:13 15 incorrect. No, I wouldn't say that it's a long-standing
16 practice, but when I have had to speak to members of the Defence
17 team, whether it's an investigator or so or a prospective
18 witness, I would use it as the needs arise.

19 Q. So that's the only time you've ever used it, you would say,
12:57:32 20 is when you're talking to a prospective witness?

21 A. I've also spoken to investigators, yes.

22 Q. Now, Mr Taylor, when did you start misusing these
23 privileged access lines to talk to prospective witnesses?

24 A. When did I start misusing them? I have never misused them.
12:57:57 25 I've told you, to the best of my advice to me I have never
26 received any notice stating that I could not.

27 Q. When did you start using those lines to be in touch with
28 prospective witnesses, Mr Taylor?

29 A. I started talking to counsel in Monrovia several months

1 ago. I would say for - oh, I would say about - he's had the
2 phone now for about a year and a half.

3 Q. Mr Taylor, I'm not talking about you speaking with your
4 counsel. I'm talking about you using these privileged access
12:58:36 5 lines to speak to prospective witnesses. How long have you been
6 doing that?

7 A. I would say about three, four months.

8 Q. That's all?

9 A. That's what I would say, yes. I have spoken to other
12:58:47 10 people, but they were not - they were investigators. But
11 prospective witnesses, three or four months.

12 Q. And other than prospective witnesses, have you spoken to
13 people who were not members of your Defence team on these
14 privileged access lines?

12:58:59 15 A. To the best of my knowledge, no, no.

16 Q. Mr Taylor, we would ask that you provide, by DCT number,
17 the witnesses that you have spoken to over these privileged
18 access lines - the prospective witnesses to whom you have spoken
19 over these privileged access lines.

12:59:30 20 Now, Mr Taylor, in addition to the use of these privileged
21 access lines - and by the way, the privileged access lines
22 themselves, how many times have you spoken to the witnesses using
23 these privileged access lines?

24 A. The prospective witnesses, I have spoken to some of these
12:59:54 25 witnesses, once, twice. That's it. Two, three of them over the
26 past I'd say three, four months. That's it.

27 Q. Now, when you have used these privileged access lines to
28 speak to witnesses as you have said, who has been present?

29 A. When I speak to them, counsel is present.

1 Q. And which counsel is present?

2 A. Counsellor Supuwood is present.

3 Q. Anyone else?

4 A. Not that I know of on the other side. And by the way, I
13:00:23 5 have spoken to - to be clear for the Court, in terms of speaking
6 to prospective witnesses on privileged lines, Monrovia is not the
7 only area that I have spoken to prospective witnesses on
8 privileged lines. I have spoken to prospective witnesses on --

9 Q. Mr Taylor, don't say anything that would give away a
13:00:52 10 person's identity.

11 A. No, I wouldn't. To answer your question, I don't know who
12 else is present in counsel's office over there. Not to my
13 knowledge, no.

14 Q. So they don't tell you who else is present when you're
13:01:09 15 talking with these people?

16 A. No, they don't tell me.

17 Q. Now, Mr Supuwood in fact has two different privileged
18 access cell phone lines at least, correct? One of them is a
19 Liberian line and one of them is a line from Ghana, isn't it?

13:01:23 20 A. That is correct, yes.

21 Q. And the Ghana service actually allows for call forwarding,
22 doesn't it?

23 A. Yeah, both countries allow for that.

24 Q. So once you're on that phone, you could be talking to
13:01:33 25 anybody anywhere?

26 A. Yes, that's true.

27 Q. So just to be clear, you think maybe five prospective
28 witnesses you have talked to. No more than that?

29 A. I did not - I said that - I would say about two, three.

1 About two, three prospective witnesses.

2 Q. No more than that?

3 A. No more than that. And I'm using the word "prospective"
4 because they may not even show up here. But they are prospective
13:02:05 5 witnesses.

6 Q. Now that we're down to two or three instead of three to
7 five, these two to three, are they all among those persons for
8 whom we have been provided summaries?

9 A. I told you before I can't be certain. You've asked me to
13:02:19 10 check it. I will check it and inform you, but I can't be
11 certain.

12 Q. Now, other than Mr Supuwood's privileged access phone
13 lines, have you used any other privileged access phone lines to
14 speak with prospective witnesses?

13:02:40 15 A. Yes.

16 Q. And whose other lines have you used?

17 A. I've used - I can remember I've called to Freetown. I've
18 used the lawyer in Freetown to talk to prospective witnesses,
19 Lansana Kamara, since the Court order, yes.

13:03:02 20 Q. Lansana Kamara?

21 A. That is correct.

22 Q. And that person is a member of your Defence team?

23 A. That is correct.

24 Q. And how many times have you done that?

13:03:13 25 A. Just a few times, and that has been as of late. I would
26 say over the past few months since it was told me that we could
27 speak to prospective witnesses, yes.

28 Q. And who told you that you could speak to prospective
29 witnesses over these privileged access lines?

1 A. Well, I have been told that I could speak to prospective
2 witnesses even on non whatchamacallit. But this is my
3 understanding from members of my Defence that have said that in
4 the presence of counsel I could speak to members - I mean, to
13:04:00 5 prospective witnesses.

6 Q. Over the privileged access lines?

7 A. That is correct.

8 Q. And who has told you that?

9 A. I said members of my Defence team have alluded to that,
13:04:15 10 yes.

11 Q. Can you recall who it was who told you that?

12 A. Well, I've - Lansana has mentioned that to me. That's when
13 I started calling.

14 Q. Anyone else on your Defence team told you that?

13:04:27 15 A. Oh, I haven't inquired of anybody else, no. Counsellor
16 Supuwood mentioned to me that that could be done.

17 Q. And how many prospective witnesses have you talked to
18 through the efforts of Lansana Kamara?

19 A. I don't know Sierra Leoneans. I think there was one --

13:04:54 20 Q. Again, don't give us names; just numbers.

21 A. There was one person so far. I would think at least one
22 person that I remember I talked to. I think - I won't give you a
23 name. It is a British person that was present in Freetown. One
24 person I can remember that I spoke to, a British individual.

13:05:17 25 Q. And how many times did you speak to that person?

26 A. I spoke to him once. He was visiting and was returning to
27 London. I spoke to him.

28 Q. And how long did that conversation last?

29 A. Oh, I would say about 25 minutes or so.

1 Q. And who was present other than that person, if you know?

2 A. Counsel was present; Lansana was present.

3 Q. Now, Mr Taylor, since you have been testifying here, on a
4 weekly basis you have been given copies of your testimony in

13:05:54 5 court, yes?

6 A. That is correct.

7 Q. And electronic copies of that testimony?

8 A. That is correct.

9 Q. And that has been for you to do with as you choose, yes?

13:06:08 10 A. Yes.

11 Q. And you have sent those electronic copies of your testimony
12 off to somewhere or someone, yes?

13 A. No, I have no way. I do not have access to electronic
14 activities at the prison, no. Those things are - in fact, they
15 are sent to me electronically through I think - what do they call
16 it here? I don't know, a Ringtail or ring something. They send
17 it in, but on the computer provided by the Court I cannot send
18 out. I can only receive from the - I don't know whether - I
19 think it I have it right, Ringtailing they call it, or something.

13:06:59 20 But I get it electronically. I do not reprint them. I go
21 through them. They are in my system. But I don't have access to
22 send anything out.

23 Q. So to your knowledge, you haven't been given a separate set
24 of your testimony each week - separate electronic copy?

13:07:14 25 A. No. There have been a few occasions where on - before the
26 Ringtailing was put into place, a few copies were delivered to me
27 confidential. But since the Ringtailing - and this was about, I
28 would say, after the first - this negotiation was done with the -
29 I think the ICC. I think some two to three weeks into my

1 testimony, or maybe a little more, then I started receiving them
2 electronically.

3 Q. And to your knowledge, is your Defence team given a
4 separate set of your testimony each week - electronic copy?

13:07:52 5 A. No, no, no. It is coming from the Defence. It is coming
6 from the Defence through this Ringtailing. It is not coming from
7 the Court Administrator. It is coming through the Defence.

8 Q. So to your knowledge, there is no separate set of testimony
9 that is given to your Defence each week to be sent to another
10 location?

11 A. No, not to my knowledge. I doubt it. To be sent to a
12 different location? No.

13 Q. Thank you for that, Mr Taylor. And again, we're very
14 grateful that you'll provide us with a list by DCT of those
15 people to whom you have spoken using the privileged access line.

16 Mr Taylor, are there any witnesses or prospective witnesses
17 with whom you have spoken not using the privileged access lines?

18 A. Not using the privileged access line? Let me see. No.
19 Let me see. I would say no for now, because my list is of such -
13:09:13 20 wait a minute. Wait a minute. Yes, I have spoken to a couple of
21 people on a non-access line that are prospective witnesses, yes.
22 I would say yes. Sorry for that. Yes.

23 Q. So a couple of those on the non-privileged access lines?

24 A. That is correct.

13:09:33 25 Q. How many times have you spoken to those people?

26 A. Regularly. I speak to - in fact, one of them, I speak to
27 him regularly.

28 Q. And over what period of time have you spoken with this
29 person on these non-privileged access lines?

1 A. Since my incarceration.

2 Q. And if you could include those, please, in the list that
3 you provide to us as well, we'd appreciate it.

4 A. Okay, yes. Yes.

13:09:58 5 Q. Now, Mr Taylor, you've talked to the Court about Sam
6 Bockarie visiting you in Monrovia in 1998 in September, October,
7 November. This September visit that he made to you, do you
8 remember when it was in September that he came to see you?

9 A. No, not exactly, counsel. I don't remember the date. I
13:10:24 10 would be misleading the Court. I remember it was in the month of
11 September.

12 Q. Do you remember how long he was in Monrovia on that visit?

13 A. Yes, Sam Bockarie probably spent about three, maximum four
14 days, I would say.

13:10:38 15 Q. And how did he travel to Monrovia on that occasion?

16 A. He drove. He came into the country and he drove all the
17 way by road.

18 Q. Just as a point of clarification, we've talked a bit about
19 the rainy season in Liberia. What is the period of time that you
13:10:56 20 actually have rains - heavy rains in Liberia?

21 A. We start receiving heavy rains I would say about June/July.
22 June or thereabouts.

23 Q. And about how long does that last?

24 A. That could go July, August, September. But with four-wheel
13:11:20 25 drive you can get through, vehicles, jeeps, yeah.

26 Q. So the heavy rains start in about June/July, thereabouts?

27 A. I would say. Based on my calculations I would say that,
28 counsel, yes.

29 Q. Now, when Sam Bockarie came to see you in September, you

1 have told the Court that he was coming to see you so you could
2 discuss moving peace forward or having peace in Sierra Leone,
3 yes?

4 A. That is correct.

13:11:49 5 Q. And he was coming to see you because you had been chosen as
6 the point man, if you will, to try to work with the RUF to
7 advance peace in Sierra Leone?

8 A. That is correct.

9 Q. Is that fair?

13:12:03 10 A. That's fair.

11 Q. Now, Mr Bockarie was coming to see you about advancing
12 peace. Why didn't he just have ECOMOG bring him by helicopter?

13 A. I don't know why he didn't make that determination. We're
14 talking about September 1998, I didn't see the necessity to call
13:12:28 15 in ECOMOG. We were actually in conflict with ECOMOG. I can't
16 make that determination for him, but it was my decision that he
17 would be driven by road.

18 Q. And who escorted him when he came to see you in September?
19 Do you remember?

13:12:44 20 A. Yes, I told you. He was escorted to me by Dopoe Menkarzon.

21 Q. And is that from the border itself all the way to Monrovia?

22 A. From the border to Monrovia, that is correct.

23 Q. And along with Dopoe Menkarzon, were there other escorts or
24 just him alone?

13:13:01 25 A. I really - I would suppose there were other escorts. I
26 don't know the combination. The order was given to him. Who he
27 took, I really don't know, but I would suspect there were others,
28 yes.

29 Q. And who gave him the order?

1 A. I did personally.

2 Q. Directly to him?

3 A. I instructed that he should go to the border and get
4 Mr Bockarie, yes.

13:13:23 5 Q. And what was Dpoe Menkarzon's position at that time,
6 September 1998?

7 A. September 1998, to the best of my recollection, I think
8 General Menkarzon was something like a security adviser to the
9 SSS, if I remember, and we were looking for the most capable
10 person.

13:13:51

11 Q. And when you say he was a security adviser to the SSS,
12 would he have been advising any particular person in the SSS?

13 A. Yes, he would have been advising Benjamin Yeaten.

14 Q. During the time that Sam Bockarie was in Monrovia in

13:14:16

15 September 1998, on how many occasions did you meet with him?

16 A. I could have met him about twice. I think I met Sam twice
17 during that time.

18 Q. And how long would these meetings have lasted?

19 A. About - I would say about an hour each. About an hour
20 each.

13:14:40

21 Q. And where were the meetings held?

22 A. They were held at the Executive Mansion.

23 Q. And where in the Executive Mansion?

24 A. In the conference room at the Executive Mansion.

13:14:51

25 Q. Where is that conference room in the Executive Mansion?

26 A. It's on the fourth floor.

27 Q. We've seen some photos I think of the Executive Mansion
28 that talk about the parlours of the Executive Mansion.

29 A. Yes.

1 Q. What are the parlours of the Executive Mansion?

2 A. The parlours - in fact, in that movie that was shown here
3 of the final ceremony, that's one on the second floor. That's on
4 the second floor where you have official programmes and different
13:15:23 5 things. That's what you call the parlour. That's on the second
6 floor.

7 Q. In your residence, White Flower, did you have an area
8 called the parlours there as well?

9 A. Well, living room, parlours, yes.

13:15:37 10 Q. So that would have been the living room area?

11 A. Yes.

12 Q. And that would also have been for use for official
13 gatherings?

14 A. Well, yes. Officials met there when they were - it was a
13:15:54 15 large - the living room or parlour at my house would be - I
16 described it I think before about a little longer than this room,
17 yes. I would receive - depending on the delegation and the time,
18 I would receive people there, yes.

19 Q. So you're talking about the length of the court room here?

13:16:14 20 A. Yes, and probably a little longer. My parlour is a little
21 longer than this, yes.

22 Q. And just so we have something for the record, can you give
23 us an estimate of what size you're talking about, the length?

24 A. You know, we're going to get into - this room we would say
13:16:38 25 about, what - I'm going to need some help here. I don't know how
26 you're going to put it. But I would say about one and a quarter
27 the length. This would be about 30 feet, 35 feet. I'm not too
28 sure, counsel. But if we got a measurement, it's about one and a
29 quarter the length. I don't know, it may be about 30 or 40 feet,

1 I don't know, but it's longer than this room.

2 MS HOLLIS: Mr President, I don't know if in the past we've
3 actually given a measurement of the length of this room or not
4 and I for one am personally bad at it, so I would rely on

13:17:23 5 Mr Taylor's guesstimate.

6 PRESIDING JUDGE: I can't quite remember. We did take some
7 measurements once and I think that was by Madam Court Manager.

8 Did that include the length of the room?

9 MS IRURA: Your Honour, we took some measurements of the
13:17:34 10 length of the room, but I would have to refer to the statistics
11 to get back to you.

12 PRESIDING JUDGE: We do have those measurements somewhere
13 and that will be checked, Ms Hollis.

14 MS HOLLIS: Thank you, Mr President:

13:17:49 15 Q. And thank you for the estimate, Mr Taylor.

16 A. Okay.

17 Q. Mr Taylor, when you met with Sam Bockarie in September
18 1998, did you make any sort of written record of those meetings?

19 A. No, no, we didn't. Not to - well, I tell you, I did not
13:18:11 20 personally, but I do think that records were taken. All meetings
21 that I had, an official in that would scribble some notes. So I
22 would say yes that some - I don't know who, but it would be
23 customary that when the President is meeting delegations,
24 somebody would take notes. I would say notes could have been
13:18:36 25 taken.

26 Q. You have no specific recollection one way or the other?

27 A. No, counsel, I'm sorry, but it could have been taken.

28 Q. Now, Sam Bockarie came back in October, the next month.

29 Why did he come back within a month to talk to you?

1 A. Well, because I invited him. After I spoke to - after I
2 spoke with Bockarie and I briefed my colleagues on the visit, it
3 was determined that it would be very important to follow up.
4 Normally these first meetings don't really yield anything
13:19:20 5 substantive and so, really, it was a follow-up. He had to go
6 back to break news to his people that he had met me. I needed
7 time to brief other members of the committee, and so I asked him
8 as to whether he would be prepared to return at some later date,
9 he said yes. And after I spoke to my colleagues, I invited him
13:19:42 10 back the next month because we had something else to talk about,
11 about moving forward.

12 Q. And how did you convey that invitation to him?

13 A. On his first visit, we established some connection at the
14 border with our commander at the border that if we had any
13:20:08 15 messages we would transport it to - we would call the commander
16 at Mendekoma. The commander would then get the message across to
17 Sam Bockarie. There was a radio at Mendekoma.

18 Q. Do you recall who it was that was the commander at
19 Mendekoma?

13:20:28 20 A. No, I don't. I don't. I'm just describing for you,
21 counsel, the procedure. I don't know the individual commanders.
22 No, I don't.

23 Q. And that would have been a commander in what unit or
24 organisation?

13:20:38 25 A. That would have been a military personnel at the border.

26 Q. So then when Sam Bockarie came back in October again, how
27 did he travel on that occasion?

28 A. The same way. He drove by road.

29 Q. So still no thought about perhaps using an ECOMOG

1 helicopter to bring him?

2 A. Well, maybe the information you have given me - I'm not
3 sure that ECOMOG - in Liberia, ECOMOG did not have any
4 helicopters, in the first instance. In 1998, ECOMOG had no
13:21:19 5 helicopters. The only thing ECOMOG had in Liberia were jet
6 fighter bombers. But, in any case, counsel, to be fair to you,
7 that was none of ECOMOG's business and, quite frankly, we didn't
8 see a need, but they did not have a helicopter.

9 Q. So Mr Bockarie was coming to see you on a peace mission,
13:21:43 10 ECOMOG was a subordinate unit of ECOWAS but it wasn't ECOMOG's
11 business?

12 A. Definitely. They were still subordinate to me. As an
13 authority of ECOWAS, ECOMOG was even subordinate to me. I could
14 have used them if I wanted to, but we chose not to deal with them
13:22:05 15 and you know why, counsel. The reason being the conflict in
16 Sierra Leone. Don't forget, this is 1998. We just had the
17 intervention in February, and to tell ECOMOG to go and bring Sam
18 Bockarie or anybody would not have been the proper thing to do.
19 That's what I mean when I say to you it was none of their
13:22:24 20 business, because as an authority of ECOWAS, ECOMOG was also
21 under me. I could not give them straight command, but ECOMOG was
22 not and could not operate as an independent force in Liberia
23 outside of the government, and so it was my decision to use
24 Liberian government sources to bring Mr Bockarie.

13:22:47 25 Q. And, again, how is he brought from the border on this
26 occasion?

27 A. He drove again.

28 Q. And who escorted him on this occasion?

29 A. I'm not sure. I'm not sure who brought him in September.

1 I really can't - I can't be sure. I know the first occasion,
2 General Menkarzon went for him. But in September, I really don't
3 know who was used, counsel, I'm sorry. I really don't.

13:23:22 4 Q. Now, you say in September that General Menkarzon - so he
5 still had the rank of general or you're just referring to an
6 earlier rank?

7 A. I'm just referring to an earlier rank, General Menkarzon.

8 Q. Did he have a rank at that time?

13:23:35 9 A. In the civilian government, no. He was just referred to as
10 general, but he did not carry a rank in the civilian government.

11 Q. And during this October visit, how long was Sam Bockarie in
12 Monrovia on this visit, do you recall?

13 A. Yes, I would say about a week because he - we had then put
14 this house together. I would say about a week. I would say
13:23:54 15 about a week.

16 Q. And do you recall how many people came with him from Sierra
17 Leone?

18 A. No, counsel. I don't know. I know he brought a
19 delegation, but I don't know how many persons. I can't be sure,
13:24:05 20 no.

21 Q. How many times did you meet with him during this October
22 visit?

23 A. Maybe another one, two times, but he was also meeting the
24 Foreign Ministry personnel that I had, the late Under - what you
13:24:27 25 would call Under-Secretary of State, Tambakai Jangaba. He's late
26 now. There were other members. But for me I would say -
27 normally these meetings, I would meet with these individuals no
28 more than once or twice, because there was a committee headed by
29 the Deputy Minister of Foreign Affairs that was dealing with the

1 nuts and bolts of the discussion. So I'd probably meet on some
2 occasions 30 minutes, I would say not more than twice, I would
3 put it to.

13:25:04 4 Q. And where did those meetings take place between you and Sam
5 Bockarie during this October trip?

6 A. At the Executive Mansion.

7 Q. And in the same location at the Executive Mansion?

8 A. That is correct.

13:25:21 9 Q. And was there any written record made of the meetings
10 during the October trip, to your recollection?

11 A. I would hope so. I would think so, counsel. I would think
12 so. Like I said, now, a meeting with the President, there would
13 be necessarily some notes.

14 Q. Do you have a specific recollection of that?

13:25:35 15 A. No. No, counsel. I'm just being very factual with you in
16 telling you that that should take place. Now, normally, if there
17 was anything special that I would - let's say if I called for the
18 notes to review, then I would have some specific recollection,
19 but there were no such things. So I don't have any specific
13:25:59 20 recollection, but what I'm saying to you is that it should have
21 happened. That's the point I'm trying to make.

22 Q. So your recollection is that during the September and
23 October visits, after those visits, you don't recall telling them
24 to bring the notes to you for you to review them?

13:26:15 25 A. No, no. You are right about that. I don't recall asking
26 to review the notes, no.

27 Q. Now, you also talked about November and Sam Bockarie coming
28 in November and you indicated that he came, he was on his way to
29 Burkina Faso.

1 A. That is correct.

2 Q. Do you remember what time in November he came?

3 A. I would put it more towards the end - maybe the end, the
4 last week or so in November or thereabout, because I can remember
13:26:45 5 he was out for about - I can't be sure. I think he was out of
6 Sierra Leone for about ten or more days and his return occurred
7 in December. So I would put it to maybe the ending of November
8 or thereabout.

9 Q. And how long was he in Monrovia on this occasion, do you
13:27:13 10 remember?

11 A. No more than about a day and then he travelled. He was
12 outside of both Sierra Leone and Liberia for, I would say, 90, 95
13 per cent of the time.

14 Q. And during this November very quick stop in Monrovia, did
13:27:28 15 you have a meeting with him at that time?

16 A. Very, very briefly, yes, I did.

17 Q. And on this November occasion when he came to Monrovia, do
18 you recall how he travelled to Monrovia?

19 A. He drove. The normal way. They all drove down. They all
13:27:48 20 drove by road. The same way he came the first and the second
21 time.

22 Q. Do you remember how many people came with him on that
23 occasion?

24 A. I can't be sure. I do remember the important individuals
13:28:00 25 that I can still recall, like I told this Court. I remember two
26 of the individuals that were on that trip. One of them was -
27 Eddie Kanneh was on that trip. The second person, as I said
28 before, I'm not too sure of the name - if I'm right about the
29 name, but it was a shortish older man, and I can't be sure about

1 the name, but he was older man, shortish type, older man. I
2 think he's dead now, if I'm not mistaken. I don't recall. But I
3 remember those two very well.

13:28:50 4 Q. Did you know the name of that man at the time? Was he
5 introduced to you?

6 A. He was introduced to me. The name was called. I just
7 can't remember it now. Probably if I hear the name I will be
8 able to identify. But I think the guy is dead, if I'm not
9 mistaken.

13:29:06 10 Q. Could that be have been SYB Rogers?

11 A. SYB Rogers, yes, that's Rogers. I'm not sure if he's dead
12 or living, but there's a Rogers, yes.

13 PRESIDING JUDGE: I think we'll leave it. But just before
14 we adjourn, Ms Hollis brought up the point earlier about the
13:29:22 15 measurements of the courtroom. I've been advised by Madam Court
16 Manager that her measurements were as follows: The length of the
17 courtroom is 13.35 metres and the width of the courtroom is 5.5
18 metres.

19 MS HOLLIS: Thank you, Mr President.

13:29:47 20 PRESIDING JUDGE: We will take the lunch break now and
21 resume at 2.30.

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

23 [Upon resuming at 2.30 p.m.]

24 PRESIDING JUDGE: Go ahead, please, Ms Hollis.

15:30:55 25 MS HOLLIS: Thank you, Mr President. And, again,
26 Mr President, just to make a record, in relation to the questions
27 regarding the accused's use of privileged phone lines, we would
28 have had recourse to materials which are the subject of the
29 formal submissions.

1 PRESIDING JUDGE: I see. Yes, thank you.

2 MS HOLLIS:

3 Q. Mr Taylor, before lunch we were talking about Sam
4 Bockarie's travel to Monrovia and beyond in November 1998. Do
15:31:26 5 you recall?

6 A. Yes, I do.

7 Q. And you had mentioned that when he came through Monrovia in
8 November that you had met with him very briefly.

9 A. That is correct.

15:31:36 10 Q. Was that just one time that you met with him or more than
11 once?

12 A. Briefly once.

13 THE WITNESS: Your Honours, I just want to call your
14 attention, counsel. I entered with a piece of paper. Counsel
15:31:50 15 had asked me to get the DCT number. I didn't want it to be said
16 I had - so I do have the information. I don't want to hold this
17 paper with me.

18 MS HOLLIS: Thank you for letting us know that. And
19 certainly the Prosecution would like to have that piece of paper,
15:32:07 20 but we would like to have it marked for identification, if that
21 is possible.

22 PRESIDING JUDGE: Do you want to see it first,
23 Mr Griffiths?

24 THE WITNESS: This is the information on the --

15:32:19 25 MR GRIFFITHS: I would like to see what's written on it.

26 THE WITNESS: -- the DCT numbers that --

27 MR GRIFFITHS: It seems to me, Mr President, that this
28 issue having arisen as a result of direct questions from my
29 I learned friend, that what's written on the paper should become a

1 part of the record because, in fact, it constitutes his answer to
2 a question put to him.

3 PRESIDING JUDGE: I was going to say the same thing.

15:33:12

4 There's no reason why it can't be part of the record, is
5 it, Ms Hollis?

6 MS HOLLIS: No. We would, in fact, ask that it be marked
7 for identification.

8 PRESIDING JUDGE: Have you seen the paper?

9 MS HOLLIS: No, I have not.

15:33:22

10 PRESIDING JUDGE: Well, show that - no, if you hold the
11 paper - I understand - what I meant, and I think this is what
12 Mr Griffiths meant, is that, you can by way of asking him, have
13 it read directly into the record.

14 MS HOLLIS: All right. Thank you. We'll do that:

15:33:56

15 Q. Now, Mr Taylor, I know you don't have a copy of this, but
16 let me tell you what I understand this to be and then you can be
17 provided this paper back and tell us whether you agree or not.

18 Yes, Mr Taylor? Now, I'm reading something that is written in
19 red ink and at the top it says "privileged line" and there,

15:34:23

20 Mr Taylor, are you referring to the privileged telephone access
21 line? Is that what that is a reference to?

22 A. That is correct.

23 Q. And this is your writing? You've written this?

24 A. I wrote that.

15:34:36

25 Q. And then I see a "1" with a circle that says "DCT-197".

26 And then I see a "2" had a says "DCT-118".

27 A. That is correct.

28 Q. So, Mr Taylor, it's my understanding what that you have
29 indicated by your writing here is that you have had access over

1 the privileged access phone line with DCT-197 and DCT-118; is
2 that correct?

3 A. That is correct.

4 Q. And that's what you are telling us here in Court today?

15:35:11 5 A. Perspective witnesses - you've asked me to list by DCT
6 number prospective witnesses that I spoke to, and what I have
7 listed for you are the prospective witnesses and the DCT as it
8 stands attached to them.

9 Q. Thank you. And I also see here something that is written
15:35:34 10 "ordinary line" and this means the monitored telephone lines; is
11 that correct?

12 A. That is correct.

13 Q. And under that I see a number 1, DCT-005?

14 A. That is correct.

15:35:45 15 Q. Number 2, DCT-158?

16 A. That is correct.

17 Q. And number 3, DCT-086?

18 A. That is correct.

19 Q. Do you need to see this to ensure --

15:36:00 20 A. I know you read it properly. And these are the individuals
21 that you asked me a question over time have I spoken to them and
22 I've said to you I've spoken to some of them since my
23 incarceration and they could be prospective witnesses to this
24 case.

15:36:18 25 Q. Thank you, Mr Taylor. And now that we have this
26 information, Mr Taylor, could you tell us, in relation to
27 DCT-197, how many times have you spoken with that person?

28 A. Oh, I don't - I'm going now - I'm going to have to reflect
29 on the record. I don't remember the exact coordination, that's

1 why I had to go and research it. Is that from the ordinary or
2 the privileged?

3 Q. That is the privileged line, Mr Taylor. Number 1 on the
4 privileged line.

15:36:48 5 A. Okay. Is that the first one?

6 Q. That's number 1.

7 A. Is there anything wrong with me looking at the paper?

8 Q. Not at all.

9 A. Okay. In the case of this individual, I have spoken number
15:37:28 10 1, I would say, two or three times.

11 Q. And the second one there, which is 118, how many times?

12 A. Once. Once.

13 Q. And in regard to the three numbers, the three DCT numbers
14 you have listed under the ordinary lines, in relation to 005, how
15:37:48 15 many times have you spoken with 005?

16 A. I've spoken to 005, since my incarceration, from day one.
17 These are people - these are friends of mine that I have talked
18 to over time.

19 Q. And 158?

15:38:02 20 A. Oh, many, many times.

21 Q. And 086?

22 A. I am trying to associate the number with the name now.
23 Many, many times, yes. Many, many times, yes.

24 MS HOLLIS: Now, Mr President, I have nothing else to ask
14:39:53 25 in relation to those numbers.

26 PRESIDING JUDGE: Just a minute. That's not in evidence.
27 You can give it back to Mr Taylor.

28 Go ahead, please, Ms Hollis.

29 MS HOLLIS: Mr President, we will now be asking that it be

1 marked for identification since the information has been put on
2 the record and made clear that it is as of today that the
3 information has been provided.

4 PRESIDING JUDGE: Yes, I agree. It's pointless to have it
14:40:48 5 marked now.

6 MS HOLLIS: Thank you:

7 Q. Now, Mr Taylor, returning to Sam Bockarie's trip through
8 Monrovia in November, and you indicated that you met with him
9 very briefly on one occasion, and what was the purpose of that
14:41:04 10 meeting on that one occasion?

11 A. Well, he was en route to Burkina Faso to meet with the
12 chairman of the OAU and I met with him briefly and provided for
13 him on that trip an interpreter that would accompany him because
14 Burkina Faso is French speaking and that interpreter was Musa
14:41:33 15 Cisse that I sent as an interpreter on that - with him.

16 Q. And this is the Musa Cisse that you have told us about who
17 was your chief of protocol?

18 A. That is correct.

19 Q. And the chairman of the OAU at that time was Blaise
14:41:51 20 Compaore?

21 A. That is correct.

22 Q. Mr Taylor, during this time period, was there an election
23 in Burkina Faso?

24 A. '98? I would think so, because - I don't want to get it
14:42:12 25 wrong and mislead you, counsel, because I do remember attending
26 the inauguration. That had to be - I know it was in December. I
27 think it was '98. About '98, I think there was an election.

28 Q. And this trip that Sam Bockarie took through Monrovia to
29 Burkina Faso, do you recall, was it before or after this

1 election?

2 A. Oh, boy, I can't recall now. I know I attended the
3 inauguration. I'm not sure if it's December '98 or December '99.
4 I may be a little caught up on it, but I know I went to the
14:42:47 5 inauguration, but I do not know when the elections were held. It
6 varies with countries. Some wait for 30 days after election
7 before inauguration. I don't know, counsel, I'm sorry.

8 Q. And when you met with Sam Bockarie, you said that you
9 provided him with an interpreter to take with him. Do you recall
14:43:05 10 if anyone else was present at your meeting with Sam Bockarie?

11 A. I don't know. There could have been maybe a staff
12 assistant in that meeting at the mansion. I don't recall who was
13 there, but normally someone would probably be in that meeting.
14 If the chief of staff is not there, maybe one of the assistants
14:43:36 15 and maybe a security personnel that is located somewhere in the
16 room. But I don't really recall who all were present in 1998 at
17 this meeting, but I did have it.

18 Q. And how did Sam Bockarie and those with him, how did they
19 travel to Burkina Faso from Monrovia?

14:43:56 20 A. To the best of my knowledge, they flew. I don't know who
21 did, but there was an aircraft that took them. Not a Liberian
22 aircraft. I think an aircraft - they had made arrangements for a
23 chartered plane or assistance. I'm not sure, but I was told that
24 they flew. I do not know which company took them.

14:44:20 25 Q. Do you recall which airport they flew out of?

26 A. Yes, they flew out of Roberts International Airport.

27 Q. Did they require any sort of travel documentation to go
28 from Monrovia to Burkina Faso?

29 A. Yes, they did require just ordinary laissez-passer.

1 Q. And who provided that?

2 A. The Government of Liberia.

3 Q. When they came to you on these trips from Sierra Leone to
4 see you in Monrovia, did they require any travel documentation to
14:44:48 5 move from Sierra Leone to Monrovia?

6 A. No, they did not require any. They were invited. They
7 came in. No, we did not require any documents from them.

8 Q. When they came back through Monrovia, did you meet with Sam
9 Bockarie on that occasion?

14:45:11 10 A. No, I don't recall meeting him. In fact I was not in town
11 in Monrovia when Sam Bockarie returned. I was somewhere out of
12 the city. I didn't get to see him upon his return.

13 Q. Did you receive any sort of written report of Sam
14 Bockarie's visit to Burkina Faso?

14:45:29 15 A. No. No, I didn't get one.

16 Q. And when they returned back to Monrovia, how did they
17 travel back to Sierra Leone, if you know?

18 A. The normal way would be to drive back by road. There was
19 no aircraft or anything like that. I'm sure they drove back by
14:45:51 20 road.

21 Q. Did you provide any sort of escort for that trip?

22 A. No, not particularly. The normal procedure, counsel, would
23 be because of the special circumstances with Sierra Leone and
24 Burkina Faso - I mean, and Bockarie, excuse me, they would come
14:46:09 25 to town and on their way out we would escort them out. But I
26 wouldn't know who participated but there would be - the security
27 would make sure that they entered and left without incident, of
28 course. Security - but who I don't know.

29 Q. So they would have been escorted back to the Sierra Leone

1 border?

2 A. To the border at least. They would have seen them securely
3 to the border, yes.

4 Q. And do you have any idea - you've said you weren't in
14:46:40 5 Monrovia, but do you have any idea how long Sam Bockarie and this
6 group stayed in Monrovia before they returned to Sierra Leone?

7 A. No, I don't think they - depending on when they arrived, if
8 it was late they would wait and go, but not for any - I would
9 say, you know, depending on when they arrived in Monrovia. If
14:47:02 10 they arrived in Monrovia early, they probably left right away.

11 If they arrived late, they probably left the next day. I can't
12 be exact right now. But I'm sure it did not take any time,
13 because if they wanted to take time they would have tried to wait
14 for my return. But that didn't happen, so they just went on

14:47:20 15 because it was not important for me. I would have gotten what
16 happened at their meeting on the other side from the chairman of
17 the OAU anyway, so they didn't stay any time to my knowledge.

18 Q. Did you receive any sort of report about their return
19 through Monrovia?

14:47:39 20 A. By report, what do you mean?

21 Q. From your personnel?

22 A. Well, yes. They simply told me that Bockarie came and he
23 left. That Bockarie had returned and he left.

24 Q. Mr Taylor, you've talked about meetings in the Executive
14:47:56 25 Mansion. Just so we're clear, the Executive Mansion that you are
26 referring to that you used when you were President, is this the
27 same Executive Mansion that Master Sergeant Doe would have used
28 when he was President?

29 A. That is correct, yes.

1 Q. And is it located in the city of Monrovia?

2 A. The Executive Mansion is in Monrovia. It's the only
3 mansion. There's only one place in the whole Republic of Liberia
4 called the Executive Mansion. It's located at Capitol Hill in
14:48:26 5 Monrovia.

6 Q. During your testimony on direct there's been made mention
7 of President Rawlings of Ghana. Can you tell us what his first
8 name is?

9 A. To the best of my recollection everybody calls him I think
14:48:44 10 it's Jerry John Rawlings to my knowledge. I could be wrong about
11 that. I think it's JJ Rawlings. I think it's Jerry John
12 Rawlings to the best of my knowledge. Or John J - I think it's
13 Jerry John Rawlings.

14 Q. Thank you. Now, Mr Taylor, you know that you and your
14:49:05 15 counsel have talked about documents relating to the eventual
16 destruction of weapons and ammunition which had been turned in
17 pursuant to the final peace agreements in your country. You
18 recall that, yes?

19 A. Yes, I do.

14:49:21 20 Q. And you recall that eventually it was certified that
21 something like 19,000 or 19,600 weapons were destroyed. Do you
22 remember that?

23 A. Counsel, numbers I'm not going to fight about. I don't
24 recall the exact amounts, but I can accept that you're being fair
14:49:43 25 about your numbers that you are calling.

26 Q. Just to be sure that I'm accurate, we'll return to that at
27 a later time. Mr Taylor, during your direct examination you have
28 testified that during the time that ECOMOG was in Liberia, that
29 the force may have numbered as many as 18,000 or 20,000 troops.

1 Is that correct?

2 A. Yes, that is fair. At the height of the deployment we were
3 told and military people may inflate or deflate - we were told at
4 the height of the deployment that there were about 18,000 troops.

14:50:34 5 Q. And at one point you have indicated that perhaps this
6 20,000 figure would have reflected ECOMOG and UN observers. Is
7 that right?

8 A. Total I would say - well, counsel, let's - I know we've
9 been throwing figures. I would want to stick closer to the 18 or
14:51:02 10 20, but that's a reflection of all of the military and other
11 observers in the country.

12 Q. And during your testimony you have talked with the judges
13 about your recollection that at some point these 18,000 or so
14 were deployed throughout your country?

14:51:23 15 A. Throughout. Throughout, yes.

16 Q. And at one point you indicated I believe that they were
17 deployed throughout your country both before the elections and
18 even after you had taken office?

19 A. That is correct. Not throughout my presidency but, yes,
14:51:44 20 following my election after some months there was a drawdown so
21 the point I just want to make: It did not remain constant after
22 my election as President but before, to the best of my knowledge,
23 yes.

24 Q. Mr Taylor, these figures of 18,000 or perhaps 20,000, those
14:52:05 25 figures are not accurate, are they?

26 A. Don't blame me. I was told that the United Nations forces
27 had 18 plus thousand in Monrovia. They may have done it for
28 other reasons but at the time we - the entire nation was told
29 that the United Nations had a good 18,000 troops. There could

1 have been 10, 12, but that's the figure that was played out
2 there. I didn't take a head count, so I'm not going to fight
3 about that. But we were told the full deployment of 18 plus
4 thousand troops in Liberia.

14:52:43 5 Q. And in terms of the deployment of these numbers of people
6 throughout your country, that occurred very infrequently, isn't
7 that correct?

8 A. Totally incorrect.

9 Q. In fact most of the time they were not deployed throughout
14:53:00 10 your country, isn't that correct?

11 A. I disagree 100 per cent. I fully disagree. The knowledge
12 -well, except the United Nations and ECOWAS misled the world, to
13 the best of my knowledge the troops that were deployed in Liberia
14 were deployed throughout the length and breadth of that country,
14:53:21 15 in charge of seaports, airports, all entries, roadblocks. That's
16 the information that was given by the forces. I had nothing to
17 do with how and where they deployed. We were told and we saw
18 them deployed throughout. The infrequency, I can't fight about
19 that.

14:53:47 20 Q. And your understanding is they were deployed throughout
21 your country during what time period?

22 A. I think we've covered that but I'll go over it again.
23 Prior to the disarmament period the troops were fully deployed.
24 The troops were deployed throughout the period going into the
14:54:12 25 elections in July. So I would say - and I can only approximate
26 this. I would say from about the middle of 1996 going on through
27 there was a gradual increase in building.

28 By the time we reached January 1997, I would say where the
29 disarmament, you know, had progressed significantly into the

1 factions being dissolved in the political parties, I would say
2 that full deployment - I would put it all the way up until about
3 near the end of 1997, I would put it to. And I would stand
4 corrected because these drawdowns, counsel, were not - they were
14:55:17 5 still military secrets so no one is saying we're going to move
6 1,000 or 5,000. But I am trying to be fair about this. I would
7 say that full deployment I can put it between the period mid 1996
8 all the way up until the end of 1997 and I could - plus or minus,
9 I would say.

14:55:38 10 Q. During the time that ECOMOG was deployed in Liberia,
11 throughout that entire time they had significant logistical
12 problems, didn't they?

13 A. Counsel, it's possible. There were times that they were
14 still calling on the international community to continue to give
14:56:04 15 assistance in terms of logistics. I'm not sure if I'm prepared
16 to categorise that as significant but I would say that all
17 militaries want everything they can get and more, so I would just
18 leave it at that. But to the best of my knowledge they were able
19 to carry out their mission successfully as they announced to the
14:56:29 20 world.

21 JUDGE DOHERTY: Ms Hollis when you say logistical, is that
22 to do with transport, communications? What type of thing have
23 you in mind?

24 MS HOLLIS: Yes:

14:56:42 25 Q. And very frequently they were complaining about the lack of
26 vehicles, about the lack of other supplies. They made very
27 frequent complaints about that, isn't that correct?

28 A. Quite frankly, counsel, I was busy trying to get elected as
29 President. I did not keep up with their problems what they had.

1 There were times we would hear - when I had the time, you know,
2 we would hear that ECOMOG was asking for more equipment. But I'm
3 afraid, counsel, I will be deceiving the Court if I answered that
4 in a yes or no. But I say they did have some problems that we
14:57:27 5 heard of but, like I said, for me, I was paying attention to
6 getting elected and my campaign, so I don't know the details of
7 their problems. I don't really know.

8 Q. And throughout ECOMOG's time in Liberia, ECOMOG also
9 suffered financial problems. Isn't that correct?

14:57:49 10 A. Oh boy, talking for ECOMOG is a hard one for me. I really
11 can't say with any degree of certainty, counsel, because military
12 complaints are always there. We were - well, I know ECOWAS at
13 the time was constantly asking the European Union and the
14 international community for financial assistance, financial
14:58:19 15 assistance. Now, if I can conclude that this constituted to the
16 type of question, you know, that you are trying to get to, I
17 don't know, because in trying to solve the - most of these crises
18 around the world there's never an end to asking for money and
19 logistics and logistical supplies, so I would beg to be not
14:58:52 20 pressed on this issue. I really don't - I can't say with a
21 degree of certainty, but I do know that there were times when
22 they would ask for money. That I do know.

23 Q. And during the time that ECOMOG was in Liberia, there were
24 times that, in fact, their financial problems led them to not
14:59:15 25 being able to pay their troops for periods of time. Isn't that
26 right?

27 A. I'm sorry, counsel, I don't know. I really don't. I'm
28 sorry, I don't know.

29 Q. During the time that they were there, in fact, their

1 troops, their officers and their fighters, some of them were
2 willing to sell their weapons for money. That's correct, isn't
3 it?

14:59:46 4 A. Well, no. I'm not aware of officers and men selling their
5 weapons for money, counsel. No, I'm not aware of that
6 phenomenon. No, I'm not.

7 Q. Mr Taylor, you've told the Court that, in fact, you bought
8 weapons from ECOMOG.

14:59:59 9 A. That is correct, I have told the Court that I bought
10 weapons from ECOMOG. That is different from your question of the
11 individual selling his weapon. I'm saying no to that. I'm not
12 refusing the fact that we bought weapons. Your question was to
13 the effect that individuals were selling their weapons. I'm
14 saying, no, I'm not aware of that.

15:00:14 15 Q. Who did you buy them from?

16 A. Commanders. From their stockpile.

17 Q. How much did you pay them for these weapons?

18 A. It depends on - sometimes 2, 3, 4, 5 thousand dollars,
19 depending on what was available. We would buy weapons from them.
15:00:34 20 Mind you now, I want to be clear about this, we're talking about
21 during the war now, counsel, and not during the time of
22 disarmament. We're talking about during the war, during the
23 fighting.

24 JUDGE SEBUTINDE: \$5,000 per what?

15:00:47 25 THE WITNESS: 5,000 United States dollars, depending on
26 what's available to buy. The question was how much did I pay
27 them, and I said depending on --

28 MS HOLLIS:

29 Q. What did you purchase for those amounts?

1 A. During the war, that would be mostly ammunition. Mostly
2 ammunition.

3 Q. And for \$2,000, how much could you buy?

4 A. Oh, not very much. Not very much. You could sometimes buy
15:01:22 5 maybe five - maybe five to seven boxes of AK ammunition. They
6 were very expensive because they knew that things were tough, so
7 those are what they used to call war prices. So they were very,
8 very expensive.

9 Now, I want to be very frank with the Court: I didn't
15:01:44 10 personally, as the leader of the NPFL, go and buy. And so
11 there's also a question as to whether those that went to buy and
12 what they brought back were sincere about what, you know, in
13 using all of the money given them. So that's another factor that
14 we used to factor in. You - a commander in an area will come and
15:02:05 15 tell you that they could get a few boxes of AK and ask for some
16 money. The money would be provided. And then they will go and
17 bring back some ammunition and say this is what they bought.
18 Now, it could be a question about as to whether they were earnest
19 in giving all the money, but \$2,000 would buy, I would say, five,
15:02:25 20 six or seven boxes of AK ammunition.

21 Q. And who would you send to ECOMOG to make these purchases?

22 A. It depends on the area. The commander in the area would
23 buy.

24 Q. Do you recall the names of any commanders that were
15:02:39 25 involved in these kinds of purchases?

26 A. Oh, I - in the marine division, that's around Harbel, you
27 will have General Sogbandi would buy from them, and I emphasise,
28 this is during the war. That's prior to the peace process. But
29 I don't know who General Musa would send. I would give the money

1 to General Musa - late General Musa, the overall commander of all
2 NPFL forces, and depending on the area, he would - I remember
3 General Sogbandi because the marine division was a very strong
4 fighting force of the NPFL and so sometimes he would say, well,
15:03:33 5 you know, the marine division have an opportunity to buy and then
6 I would know.

7 Q. And General Sogbandi, what was his rank?

8 A. General Sogbandi carried the rank of lieutenant general.

9 Q. That's a three-star general?

15:03:52 10 A. That's correct.

11 Q. What's his first name?

12 A. Melvyn.

13 Q. And he was the commander of the marine division?

14 A. At the time that they buy, yes.

15:03:59 15 Q. And when was that? During what time was he the commander
16 of the marine division?

17 A. Let me see. The first commander was Nixon Gaye. I forgot
18 the year, but this would be - I would put it to about - oh, I
19 would put it to around 1994, thereabout. I would put it to about
15:04:25 20 1994.

21 Q. Did you know the names of any of the ECOMOG commanders who
22 sold this ammunition to the NPFL?

23 A. No, I'm sorry, counsel, I didn't get involved in that. The
24 money was given to General Musa. He passed it to - all I was
15:04:42 25 interested in is some ammunition. No, I don't know, counsel.

26 Q. At the time that General Sogbandi would have been making
27 these purchases, you said 1994, what area was he in control of in
28 Liberia?

29 A. I just mentioned the Harbel - the Harbel area.

1 Q. Just the Harbel area?

2 A. Yes. General Sogbandi was in charge of the Harbel area,
3 Firestone, that's what we call the Firestone, going towards
4 Monrovia. The entire area was controlled by General Sogbandi and
15:05:09 5 the marine division. Kakata, Harbel, that general area, toward
6 Monrovia.

7 Q. And General Musa would have made arrangements for other
8 such deals with other of your commanders? Is that your
9 understanding?

15:05:26 10 A. Well, my understanding is that the commander would tell
11 General Musa when a deal was imminent. That's my understanding,
12 yes.

13 Q. Now, Mr Taylor, if we could go back a bit in time to look
14 at this point about ECOMOG presence and UN presence in your
15:05:54 15 country.

16 A. Uh-huh.

17 Q. Do you recall the Yamoussoukro discussions culminating in
18 what some people call the Yamoussoukro IV agreement? Do you
19 recall?

15:06:05 20 A. Yes, I have a general knowledge about this. It's been a
21 long time, counsel, but I'm aware, yes. I am aware of
22 Yamoussoukro.

23 Q. And the Yamoussoukro IV agreement would have been 30
24 October 1991?

15:06:19 25 A. Or thereabout, yes.

26 Q. And these were the series of meetings and agreements that
27 took place in Yamoussoukro, which as you said is the official or
28 formal capital of Cote d'Ivoire. Is that correct?

29 A. I'm not sure if I say formal. It is still either the

1 political or the economic capital still, but, I mean, generally,
2 you are on the point.

3 Q. And this final agreement, Yamoussoukro IV, called on ECOMOG
4 to have quite an expanded role in Liberia. Do you recall that?

15:06:52 5 A. Yes, I do.

6 Q. Including that ECOMOG would basically have supervision over
7 disarmament and encampment of the factions. Do you recall that?

8 A. That is correct.

9 Q. And in order to carry out its role, ECOMOG would deploy
15:07:12 10 countrywide?

11 A. That is correct.

12 Q. And have freedom of movement countrywide?

13 A. That is correct.

14 Q. And you recall also that this Yamoussoukro agreement also
15:07:30 15 resulted in forces from additional countries actually coming in
16 to take part in the ECOMOG mandate. Do you recall that,
17 including Senegal?

18 A. There were contributing countries, yes.

19 Q. That was part of your demand, was it not, that this group
15:07:46 20 be expanded to include other countries?

21 A. Yes.

22 Q. Because of your concerns about Nigeria, predominantly?

23 A. That is correct.

24 Q. Now, do you happen to remember who it was from the NPFL
15:08:00 25 that took part in this Yamoussoukro IV, where this agreement was
26 actually signed?

27 A. Oh, counsel, I'll tell you, there were so many of those
28 agreements. I don't remember precisely the delegation, I swear.
29 These - there were so many meetings and counter-meetings.

1 Q. Were you there to sign on behalf of the NPFL or was it
2 someone else?

3 A. I don't recall. I don't recall if I was present at
4 Yamoussoukro IV. Let me put it this way: I'm trying to figure
15:08:37 5 which one was III and which was IV. I think I was present. I'm
6 not too sure, counsel. It's 1991, '92 - I'm not too sure if I
7 was present. I'm not too sure.

8 Q. But someone would have been there to sign on behalf of the
9 NPFL?

15:09:02 10 A. Definitely.

11 Q. Now, another thing that would have been agreed or was
12 agreed at this Yamoussoukro series of agreements culminating in
13 Yamoussoukro IV was that ECOMOG would control border crossings,
14 correct?

15:09:19 15 A. That is correct.

16 Q. And, in fact, ECOMOG was to establish a buffer zone?

17 A. That is correct.

18 Q. Basically on the Sierra Leone border and control entry into
19 Liberia.

20 A. That is correct.

21 Q. Was part of that agreement, do you recall that?

22 A. Well, I believe - you're looking at the agreement. The
23 specifics, I don't know, but, generally, I don't have any
24 disagreement.

15:09:41 25 Q. So when you signed this agreement, then you were in accord
26 with the idea of ECOMOG deploying countrywide, having freedom of
27 movement, carrying out these mandates, yes?

28 A. That is correct.

29 Q. Now, at about the same time you were asking that ECOMOG

1 downsize, were you not?

2 A. That they downsize?

3 Q. Yes.

4 A. I don't know specifically if it's downsizing or we were
15:10:17 5 trying to talk about neutrality as much as - I'm not sure if I
6 used, during that particular time, the terminology downsize. We
7 were talking in terms of trying to fish out the bad people and
8 bring in some neutral forces. I can't recall - I'll trust you on
9 this one. I can't recall asking for the downsizing of ECOMOG. I
15:10:46 10 can't recall.

11 Q. Do you recall asking that ECOMOG reduce its numbers to
12 around 1,500 troops at this time?

13 A. Specifically, ECOMOG, I stand corrected on it, I don't
14 recall that, counsel, giving a specific number. I would have to
15:11:12 15 see the agreement to see or whatever led to that and what it was
16 referring to, but I really can't recall that. You could very
17 well - there would be a 1,500 somewhere, but I really don't
18 recall it, counsel.

19 Q. Now, perhaps you remember that after this October '91 -
15:11:31 20 early October '91 agreement that there were delays in the
21 schedule for encampment and disarmament of factions. Do you
22 recall that?

23 A. Yes.

24 Q. And, in fact, by March 1992, encampment and disarmament of
15:11:50 25 the factions had not been accomplished. Do you recall that?

26 A. That's correct.

27 Q. And the buffer zones on the Sierra Leone-Liberia border had
28 not been put into place as of March 1992?

29 A. That sound right. Go ahead. That sounds right.

1 Q. And the monitoring function, which ECOMOG had also been
2 given monitoring of airports and seaports, that had not been done
3 as of March 1992. Do you recall that?

4 A. Well, some - some areas, you know, were being monitored.
15:12:33 5 Because I can remember by then, ECOMOG, the Nigerian navy, were
6 monitoring seaports along the coast. On the ground, in places
7 like Monrovia, of course, Spriggs Payne Airport was being
8 monitored. It was being controlled by ECOMOG.

9 Now, I have to think about March, you say, of 1992. I
15:13:05 10 cannot recall if ECOMOG is at Roberts International Airport, but
11 what I do know is that some monitoring is going on. The sea -
12 the sea lanes are being monitored. There are reconnaissance
13 flights being flown by Nigerian planes. I would call that a form
14 of monitoring. But as far as the deployment - the roadblocks and
15:13:31 15 deployment, that is not in place. No, that is not done.

16 Q. So it is your recollection that some monitoring was going
17 on?

18 A. Yes, that's my recollection, counsel.

19 Q. During the period from January to March 1992, you were
15:13:43 20 engaged in talks with ECOMOG about this disarmament process.
21 Isn't that right?

22 A. Yes, that could be right, yes.

23 Q. And during that time, actually, those talks with you broke
24 down. Do you recall that?

15:13:59 25 A. Yes, that's a possibility, yes.

26 Q. And they broke down over your demand that your NPFL deploy
27 jointly with ECOMOG. That's correct, isn't it?

28 A. Well, at that time, yes. That sounds fairly right, yes.

29 Q. By early 1992 actually troops from some additional

1 countries had joined ECOMOG in Liberia. That's correct, isn't
2 it?

3 A. Let me think back. There was some contributing forces.
4 Yes. I would say that, yes.

15:14:39 5 Q. By March of 1992 there were about 1,200 Senegalese who had
6 joined ECOMOG in Liberia. Do you recall that?

7 A. We agree. You asked me; I agree.

8 Q. And in fact you had said, "Send me Senegalese troops and I
9 will be happy to disarm to them because they are trustworthy."

15:14:59 10 You had made that comment, yes?

11 A. Yes, but now, counsel, you're coming to get me going again
12 because here we're talking about a figure of speech, figurative
13 speaking and all that kind of stuff and then I will have to get
14 into the context, because the question here now on the ground is

15:15:22 15 credibility. That's the question. Are the Nigerian and other
16 troops on the ground credible enough to disarm to?

17 Q. Mr Taylor, before you get into context let's go back to my
18 question. You had said, "Send me Senegalese troops and I will be
19 happy to disarm to them because they are trustworthy." You did
20 say that, did you not?

15:15:45 20

21 A. Oh, yes, I did say that.

22 Q. And had you this lingering suspicion about Nigeria and
23 other troop contributing countries that had been involved up to
24 this point. Is that correct?

15:15:55 25 A. That is correct.

26 Q. But now once these Senegalese troops arrived, that you said
27 you would be happy to disarm to, you complained about them,
28 didn't you?

29 A. We did complain about the Senegalese troops.

1 Q. You complained they were being used by the United States
2 for United States surrogate activities in Liberia, yes?

3 A. Well, then now then you can cannot stop me from explaining
4 because if --

15:16:27 5 Q. First of all, did you complain about that?

6 A. Well, you know, this is the whole question that I've been
7 monitored by the President of the Court. You are getting into
8 subject matters where you are asking me to say yes or no to
9 these. You are not contextualising this and you are moving on
10 forward. So it puts me in a position where unless this Court
11 wants fairness where they can understand the context of a
12 language then I have a difficulty.

13 Q. Well, let's have fairness by first having you answer the
14 question, Mr Taylor?

15:17:05 15 A. Well, I need some more --

16 Q. Did you complain - and this is the question: Did you
17 complain about the Senegalese? Did you complain that they were
18 being used by United States for United States surrogate
19 activities in Liberia? Did you make that complaint?

15:17:21 20 A. That was one of many problems with the Senegalese after
21 they arrived.

22 Q. So you made that complaint?

23 A. Amongst others.

24 Q. Now, Mr Taylor, if you feel it's necessary to this answer,
15:17:32 25 go ahead and tell the Court about this context that you talked
26 about?

27 A. Well, I will continue. Don't let's hold up - continue your
28 question. I've said that and many other things. Where did the
29 Senegalese come from when they came to Liberia?

1 Q. Did they come from Senegal?

2 A. No, these were troops that had been serving where?

3 Q. You tell us.

4 A. They were serving - if I'm not mistaken these were troops
15:18:00 5 that had been either serving in - they had contributed, if I'm
6 not mistaken, during the first Gulf War. They had come to
7 Liberia under United States command at the time and they came to
8 Liberia with an attitude that they had come to teach everybody a
9 lesson and they were very rude, disorderly and we were shocked
15:18:27 10 because we had said that they would be good as a brother West
11 African country. They had a total attitude and wanted to be seen
12 as American troops instead of Senegalese troops. This was the
13 problem that arose on ground, so that's what I meant by --

14 Q. So you are telling this Court that these Senegalese troops
15:18:44 15 who came to Liberia wanted to be seen as American troops?

16 A. That's it. This was the difficulty. They had been trained
17 by the Americans and they were the best, they were better than
18 anybody else, and they did go far off the mark and then
19 immediately we complained. We said, "Wait a minute. You are our
15:19:02 20 brothers from Senegal and we expect that you" - but the attitude
21 was totally different.

22 Since you want me to explain to the Court, the Senegalese
23 troops that came to Liberia were armed, equipped and sponsored by
24 the United States government. Not the Senegalese government at
15:19:21 25 the time. Totally armed. All of their arms, all of their
26 supplies, uniform, boots, the payments for Liberia were all paid
27 for by the United States government and they had an attitude
28 beyond reason unfortunately. That's what I meant.

29 Q. So 1,200, that was the maximum number that came to Liberia.

1 Is that correct?

2 A. Quite frankly I don't know, counsel. You know, when a
3 military says 1,200, you may as well add some more to it because,
4 as you know, you are a military personnel, support staff and

15:20:07 5 others. I don't know the exact amount that came. We were told

6 that there was a Senegalese unit. There could have been 1,200,

7 there could have been more, I'm sorry. But exact numbers, I

8 think it was something like a security secret for them. But I

9 remember it was a battalion and when you add support and other

15:20:28 10 things it could be - I would in my speculation - well, no. In my

11 guess I would say there were more than 1,200.

12 Q. And they were under the command of whom when they arrived

13 in Liberia as part of the ECOMOG force?

14 A. The immediate commander, I'm sorry, counsel, I don't know

15:20:47 15 but he - but they would have fallen under the overall command of

16 the forces commander at the time and 1992, I swear if I remember

17 - I don't remember neither of the two, counsel, who were the

18 immediate commander or the forces commander at the time. Maybe

19 if I hear a few names I may recall, but I don't remember.

15:21:11 20 Q. The ECOMOG forces commander would have been their ultimate

21 commander in the country?

22 A. Yes, and I don't remember who it was at that time.

23 Q. Mr Taylor, do you remember that in April 1992 there was a

24 peace conference in Geneva actually held in Geneva because this

15:21:28 25 was President Houphouet-Boigny's winter home? Do you remember

26 that?

27 A. That is correct. Yes, I do.

28 Q. And during that peace conference there was actually a

29 change in these goals for the various parts of Yamoussoukro IV,

1 yes?

2 A. That is correct.

3 Q. Because they had not been carried out so they basically
4 changed the timetable, pushed it back, yes?

15:21:51 5 A. That is correct.

6 Q. Do you remember who was there on behalf of the NPFL?

7 A. I personally was in Geneva myself.

8 Q. So then you personally agreed to moving back these
9 timetables for the various functions?

15:22:06 10 A. That is correct, yes.

11 Q. And you signed this conference agreement in Geneva, you
12 personally signed it?

13 A. Yes.

14 Q. A short time after you signed it you actually complained
15:22:22 15 that you had been pressured into signing it. Isn't that correct?

16 A. Oh, these things happen, yeah. Yeah.

17 Q. And you dismissed that agreement, describing it as the
18 colonisation of Liberia with the force commander of ECOMOG as the
19 governor general. Isn't that how you described it?

15:22:40 20 A. And I think that was a very good description, yes, I did.

21 Q. So that was your description?

22 A. Oh, yes. I think it was fair.

23 Q. Later in April you also had a national conference in
24 Gbarnga, isn't that correct, on about 21 April?

15:23:02 25 A. That is correct.

26 Q. And at that national conference you again called for a
27 reduction in the numbers of ECOMOG, did you not?

28 A. That's possible, yes.

29 Q. Asking that ECOMOG be reduced down to about 1,500 people?

1 A. I don't remember the exact numbers but I did call for a
2 reduction in terms of overall compartmentation, yes.

3 Q. And you also insisted that you, the NPFL, would have
4 control over your disarmament. Isn't that right?

15:23:38 5 A. I don't remember the exact language, but there had to be
6 something more to that because no one - in speaking about the
7 disarmament, I would have to get maybe a little deeper into that
8 part of some of the reasons why. But when I said that the NPFL
9 would have control over its disarmament, maybe later on if you
10 ask me what I meant, but the control factor is there and there's
11 a reason. Because nobody could control the combatants, so of
12 course the control had to be with orders to camps and whatnot.
13 Everybody must have control of their combatants before they are
14 disarmed. If not they would never get disarmed, yeah.

15:24:09 10
15:24:28 15 Q. When you say that the control must be orders to camps, what
16 do you mean by that?

17 A. ECOMOG could not come in for disarmament and order
18 individuals to camp. Who do they order? They know no one. It
19 is the leadership of the organisation that will order its men
15:24:45 20 into camps to prepare for disarmament and psychologically deal
21 with them. But no peacekeeping force comes into a country and
22 orders people. Where do they know to tell them where to go? You
23 don't know the people. So that control we were talking about was
24 you have to let us manage our people and then you disarm them
15:25:09 25 after they are placed in camps. That's what we were talking
26 about.

27 Q. And under your decisions about how you would go about this
28 disarmament, who of the NPFL would be in control of each of these
29 camps that your men would be going to?

1 A. Well, during that time the camps were set up based on
2 divisions. The divisional commander would be in charge of the
3 various designated camps and would designate maybe the battalion
4 commanders to be present or a senior officer from that division
15:25:51 5 would be present in those camps to make sure that the soldiers
6 behaved properly and were ready for disarmament.

7 Q. And during this time how many divisions did you have within
8 the NPFL?

9 A. We're talking about what, 1992?

15:26:09 10 Q. Yes.

11 A. I would say we had the navy, Marines, Strike Force, army.
12 I would say about four. Four, possibly five, divisions, I would
13 say.

14 Q. Do you remember what the fifth division might have been?

15:26:39 15 A. I don't know. Let me see, what did I call?

16 Q. You said navy, Marine, Strike Force, army?

17 A. I think I would stop to four now until I can remember the
18 fifth, but I think there were about four divisions because sure
19 enough we didn't an air force.

15:27:01 20 Q. Did you have any specialised units other than these
21 divisions?

22 A. Specialised units in terms of what? You're talking about
23 army units or --

24 Q. No, outside of your divisions did you have any other units
15:27:15 25 in the NPFL that were specialised in some sense and operated
26 outside your divisions?

27 A. No, not to my knowledge.

28 Q. At this point in time who was responsible for protecting
29 you?

1 A. For me we had the Executive Mansion Guard battalion
2 protecting me.

3 Q. Were they a part of one of these divisions or were they
4 separate?

15:27:46 5 A. That was a part of the - what I did, to really explain to
6 you, all of the divisions contributed men to that particular. So
7 it was a part of the different divisions. We tried to find the
8 best and promising men and women to constitute the Executive
9 Mansion Guard battalion. So I would say it was a combination of
10 all divisions put together.

11 Q. Organisationally did it fall under one of these division
12 commanders or was it separate?

13 A. No, it was under the battalion commander.

14 Q. So at this time in about April 1992, who was your navy
15:28:34 15 commander?

16 A. 1992? I would say, if I'm not mistaken, counsel, it had to
17 be - I would say the navy commander was most probably Daniel
18 Chea, if I'm not wrong, at the time. It was - it rests - this
19 one - I may have to correct myself on this. It's either Johnson
15:29:15 20 Leama - that's spelled L-E-A-M-A - he is one of our Special
21 Forces. That name is on the record. He's on the Special Forces.
22 It's either Johnson Leama or Daniel Chea. I'm sorry, I can't be
23 exact right now. I mean, I'll probably correct it in a day or
24 two. Either Johnson Leama or Daniel Chea, one of the two.

15:29:40 25 Q. And just remind us, Daniel Chea, was he one of your Special
26 Forces?

27 A. No, Daniel Chea was not a Special Force. Daniel Chea was
28 American trained but not our Special Force.

29 Q. Your marine division in 1992, now, you've said in 1994 it

1 was Melvyn Sogbandi?

2 A. Sogbandi, yes.

3 Q. What about in 1992?

4 A. Before Sogbandi, the commander was Nixon Gaye. That's

15:30:10 5 spel t G-A-Y-E. Nixon Gaye.

6 Q. So in 1992, would it have been Nixon Gaye or Melvyn

7 Sogbandi?

8 A. I'm trying to get the timeline here, counsel, so I don't

9 mislead the Court. '91, I move to Gbarnga. '92, I would say

15:30:35 10 that would be Nixon Gaye. I would say it would be Nixon Gaye.

11 Maybe the early part --

12 Q. April of '92?

13 A. Yeah. I would put it to about that. I know that - oh,

14 these years. These years - okay. I know that Nixon Gaye is the

15:31:06 15 commander now. Timeline, I'm going to have to figure that out.

16 Q. The Strike Force division, who would have been the

17 commander of that in April '92?

18 A. Strike Force division? It could be one of several Special

19 Forces. I can't quite remember that right now. I can't recall

15:31:44 20 right now.

21 Q. What about army division?

22 A. I think the army could have been controlled by, if I'm not

23 mistaken, John Teah.

24 Q. Who is that?

15:31:55 25 A. John Teah, T-E-A-H. I think John Teah could have

26 controlled that.

27 Q. Now, at this time, in 1992, these division commanders would

28 have held what rank?

29 A. They would have had the - all divisional commanders held

1 the rank of lieutenant general.

2 Q. And the commander of your EMG battalion, the Executive
3 Mansion Guard battalion, what rank would that person have held?

15:32:32

4 A. I think that time that person would have been somewhere
5 either brigadier or major general. I would say at least not
6 lower than a brigadier.

7 Q. And who was it at this time, April 1992?

8 A. Oh, it was Michael Paygar. P-A-Y-G-A-R. Paygar was there.

9 Q. How long did he hold that position?

15:32:55

10 A. Michael Paygar was commander of the Executive Mansion Guard
11 battalion, I would say until somewhere in 1993 all the way - he
12 had been commanding all the way. Remember, he comes from
13 Gborplay, all the way. Until about 1993, and I would almost say
14 it would be the second half of 1993 and that was turned over then
15 to Cassius Jacob, so I would say up until about 1993.

15:33:31

16 Q. Paygar, was he a Special Forces?

17 A. That is correct, yes.

18 Q. Cassius Jacob, you have indicated to the Court, was not a
19 Special Forces?

15:33:50

20 A. No, he was not.

21 Q. Where was he trained?

22 A. Cassius Jacob had gone through the ranks and finally he was
23 trained under a special programme at Gbatala, but he had been
24 fighting through the ranks over years and had worked with
25 different units and was a very promising individual. He was
26 trained in Liberia.

15:34:10

27 Q. It was end of April 1992 when ECOMOG actually began to make
28 its deployment into the countryside. Isn't that correct?

29 A. Oh, counsel, if you are quoting that from any authoritative

1 source, I would say yes. We're getting into large timelines. I
2 would say that's about correct.

3 Q. That was the beginning of their deployment?

4 A. Yes, I would say so.

15:34:48 5 Q. And they had some difficulties with that deployment. Isn't
6 that correct?

7 A. That is correct.

8 Q. And some those difficulties were fighting in different
9 parts of the country, security issues in different parts of the
10 country?

15:35:01

11 A. Yes.

12 Q. Now, after they did deploy, even in part, they were not
13 provided the freedom of movement that had been guaranteed to them
14 in the Yamoussoukro agreements, were they?

15:35:19

15 A. There were difficulties, counsel. There were difficulties.
16 It was a very tense situation. I would say they had
17 difficulties, yes.

18 Q. And in your territory, ECOMOG was kept under surveillance
19 of your NPFL. Isn't that correct?

15:35:34

20 A. That would be normal, yes.

21 Q. In fact, at some point ECOMOG was denied accommodation in
22 your areas, weren't they?

23 A. I don't recall the situation, but that's possible in a
24 conflict situation like that, yes, that's possible.

15:35:53

25 Q. And their heavy weapons were disallowed in your areas?

26 A. Oh, yes. That's true, yes.

27 Q. Indeed, in your areas and perhaps some others as well, in
28 effect, it was ECOMOG who became encamped in their positions.

29 That's correct, isn't it?

1 A. Well, I can't say that they were encamped. All I know, and
2 I can attest to it, that there were difficulties arising from the
3 different problems and lack of, what you call, trust, and so in
4 some ways they had difficulties moving and so - but that's a part
15:36:37 5 of the process everywhere you go. I would say yes, counsel.

6 Q. And, in fact, in your areas, they were only allowed to move
7 if your NPFL escorted them. That's correct, isn't it?

8 A. I would say, yes, for their own security, it was very
9 necessary because of hostilities towards them. We wanted to make
15:36:57 10 sure that because the NPFL operated - and I've gone through this
11 before - in a way that different sections of the country
12 depending on the situation. We just wanted to make sure - and by
13 escort we mean to have someone present with them that the
14 fighters will recognise, because ECOMOG was, up until that time
15:37:25 15 was not considered a friendly force.

16 And by the way, counsel, there were parts of the country
17 that people still didn't know that we had a peace agreement. So
18 I just wanted to add that they had - they had some difficulties.
19 They would be escorted in order that people would know that they
15:37:49 20 were not enemy forces, because, remember, we've been fighting.
21 We've been fighting these forces.

22 Q. That also allowed you to keep track of what they were
23 doing, didn't it?

24 A. That's a part of the game. You know that.

15:38:01 25 Q. And it allowed you to delay their movements if escorts
26 weren't available?

27 A. No, no, no, no. There was nothing cynical about that.
28 Whenever we were - in fact, they worked on a very good programme.
29 There were informants. We had time to provide them escort. If

1 they did not inform us and they came, let's say, through a
2 momentary stuff, we still tried to accommodate them. But one
3 thing we wanted to make sure was that we didn't want them moving
4 without at least one individual, a commander, being present that
15:38:41 5 they would be able to - let's say if a situation arose, that they
6 would be able to handle it, because some of the fighters in the
7 bushes had still not gotten to know that there was an agreement.
8 So I will tell you, basically, this is not done to hinder them.
9 In my opinion, it's more a situation where we wanted to make sure
15:39:06 10 that the process went on without incident and because we did
11 eventually have an unfortunate incident where --

12 Q. Yes, indeed, you did, didn't you? Was that - that was in
13 May or June 1992, wasn't it?

14 A. Well, it depends on which incident you are referring to
15:39:24 15 now, counsel.

16 Q. I'm referring to the incident where your NPFL killed
17 Senegalese troops in Vahun.

18 A. That's the incident I'm talking about. Because they had
19 been moving into an area that they did not expect and all they
15:39:37 20 saw - and it's important for your note, counsel, the ECOMOG
21 troops - all ECOMOG troops in Liberia wore the same uniform. You
22 understand me? And a strap. So when you're coming, it's not
23 that they could distinguish between Senegalese or anything. Once
24 you were an ECOMOG troop - and in that part of the country,
15:40:03 25 people hardly listened to radio. Nothing. This is in the Vahun
26 area. This is the national Gola forest area of the country.
27 They did not know. All of these soldiers, they thought these
28 were ECOMOG coming to attack. It was a very unfortunately
29 situation.

1 Q. And some four or six Senegalese troops were killed by your
2 NPFL in that incident. Isn't that correct?

3 A. I think you're pretty correct about the quantity.

4 Q. And, in fact, weapons and their vehicles were taken from
15:40:35 5 the ECOMOG who were in that area. Isn't that correct?

6 A. Yes. I'm sure they were returned, especially the vehicles.
7 But that was very unfortunate. It was an ambush that
8 unfortunately killed some individuals, yes.

9 Q. Mr Taylor, is it your recollection that these Senegalese
15:41:01 10 troops were killed by your NPFL after they found a weapons cache
11 in that area?

12 A. Your question again is what again?

13 Q. That these Senegalese-ECOMOG were killed in Vahun by your
14 men because these ECOMOG found a weapons cache in that area.

15:41:14 15 A. No, this is not my information, no.

16 Q. That's not your recollection?

17 A. No, no, not recollection. This is not the information that
18 reached me. The information that reached me, that they were
19 ambushed. Now, as far as the information you just gave of
15:41:30 20 finding a weapons cache, I don't think that is accurate and could
21 not have been. The area of the country that these people were
22 in, you hardly have roads. If somebody wanted to hide a cache of
23 weapons in that forest, they could surely do it, as ULIMO did.

24 It's a vast forest with hardly any roads, so I don't think that
15:41:52 25 your assessment would be right, and that's why I'm saying, it's
26 not that I don't recollect. It's just that information didn't
27 reach me.

28 Q. Now, after these Senegalese were killed in Vahun, in fact,
29 it was after that that the Senegalese withdrew their troops from

1 various areas in the countryside. Isn't that correct?

2 A. That is correct.

3 Q. So ECOMOG didn't begin to deploy until April 1992 and then
4 we have this incident in late May or June and the Senegalese

15:42:30 5 troops withdraw from the countryside. That's correct, yes?

6 A. Well, let me just say, withdraw from the Vahun area, yes.
7 But the countryside could be anywhere. Withdraw from the Vahun
8 area, yes.

9 Q. Mr Taylor, do you remember after this incident, in late
10 July 1992, the ECOWAS annual summit that was held in Dakar?

15:42:53

11 A. When you say do I recall, I'm sure, yes. That's around the
12 time. July/August are summit months, yes.

13 Q. And this was a month or two after the killing of the
14 Senegalese peacekeepers by your men in Vahun, yes?

15:43:27

15 A. I would say thereabout, yes.

16 Q. And at this meeting in Dakar, the Heads of State endorsed
17 all of the agreements that had been reached in the Yamoussoukro
18 meetings, yes?

19 A. Yes. The Heads of State endorsed these meetings, yes.

15:43:48

20 Q. And they endorsed the clarifications, the change in
21 timetable that had been put into place in the Geneva meetings as
22 well, yes?

23 A. Yes.

24 Q. And they noted that the Yamoussoukro accord called on all
25 parties, in particular the NPFL, to cooperate fully with ECOMOG
26 to ensure speedy, uninterrupted and effective implementation of
27 the accord, yes?

15:44:10

28 A. Yes. Most communique would do that, yes.

29 Q. It's true also at this Dakar meeting that the authority

1 determined that the uncooperative conduct by your NPFL,
2 especially with regard to encampment and disarmament of your
3 combatants and the insertion of a buffer zone along the
4 Liberia-Sierra Leone border, that the uncooperative conduct by
15:44:49 5 the NPFL in this regard continued to pose a serious threat to
6 peace, stability and security of West Africa. That's what the
7 authority concluded, isn't that correct?

8 A. If that's what's in the document, yes. We're dealing with
9 a peace process here, counsel, and at these meetings conclusions
15:45:11 10 are drawn. But, you know, if you look at from 1992 we didn't get
11 an agreement until 1996. So this whole process and the language
12 used in these agreements when you have conflicts, it is very
13 important to understand that some - we've got agreements that
14 have been going on since 1948. We're still trying to get an
15:45:35 15 agreement between the Palestinians and Israelis. So these
16 agreements, counsel, I agree with you - these are decisions,
17 problems evolve, they go to other decisions. But, yes, I agree
18 with you that they decided that, but that's the whole process of
19 getting peace together. It's not an easy process.

15:46:03 20 Q. Perhaps if we look at MFI-276 we can have a better
21 understanding of exactly the kinds of things that were decided at
22 this Dakar conference. This is the official journal of the
23 Economic Community of West African States, volume 22, special
24 edition 1997. It sets out main documents on the Liberian crisis,
15:46:36 25 special supplement of the official journal and the Dakar
26 conference begins at page 5 of that document. This is a final
27 communique.

28 MR GRIFFITHS: I'm not so sure we have the right MFI
29 number. 276, according to our records is a letter to President

1 Bill Clinton.

2 MS HOLLIS: We have here DCT-184, MFI-276 as being the same
3 document, so perhaps we're in error.

15:47:30

4 PRESIDING JUDGE: My Bench note here is MFI-276 is the
5 official journal of ECOWAS.

6 MS HOLLIS: Which is the document I'm referring to. Have
7 the Defence been able to locate that document?

15:48:36

8 MR GRIFFITHS: We're are looking for that but I'm sure it's
9 our fault. You are perfectly correct. Your reference is
10 correct. We've got a problem here. I'll sort it out.

11 MS HOLLIS: Would you like us to wait until you have your
12 copy before you?

13 MR GRIFFITHS: No.

14 MS HOLLIS:

15:48:45

15 Q. Mr Taylor, if we look at page 5 of that document can you
16 see that on your screen?

17 A. Yes, I can.

15:49:04

18 Q. And we see that it is - and for your assistance it would be
19 tab 7 in binder 1 of 3 for week 31. Mr Taylor, we see it is the
20 15th ordinary session of the Authority of Heads of State and
21 Government of the Economic Community of West African States
22 (ECOWAS), Dakar, 27 to 29 July, 1992, final communique. So that
23 is what we're talking about here, yes?

24 A. Yes.

15:49:29

25 Q. Then if we look at page 7 of the document, paragraph 10 is
26 the paragraph indicating that:

27 "The authority determined that the uncooperative conduct of
28 the NPFL, especially with regard to the encampment and
29 disarmament of its combatants and the insertion of a buffer zone

1 along the Liberia-Sierra Leone border continued to pose a serious
2 threat to the peace, stability and security of the West African
3 region."

4 You see that? We talked about that earlier, yes?

15:50:10 5 A. Yes, I do, yes.

6 Q. Then the authority decided as follows, and if we look at
7 (b):

8 "That unless Charles Taylor and the NPFL comply fully with
9 the implementation of the said programme, the authority shall
10 impose comprehensive sanctions against Charles Taylor and the
11 NPFL-controlled areas of Liberia and any other party that fails
12 to comply with the implementation of the programme."

13 So that's what occurred at that Dakar conference, yes?

14 A. Yes.

15:50:55 15 Q. Then if we look at (c):

16 "That all the member states of ECOWAS shall take all
17 necessary measures to give full effect to this decision."

18 And (d):

19 "The Committee of Five, in consultation with the Standing
15:51:18 20 Mediation Committee shall seek the assistance of the Security
21 Council of the United Nations to make whatever sanctions are
22 imposed effective and binding on all members of the international
23 community in accordance with the provisions of the United Nations
24 charter."

15:51:38 25 Mr Taylor, to your knowledge did in fact the United Nations
26 Security Council subsequently take action to impose sanctions?

27 A. I don't - I remember the arms embargo, but sanctions? I
28 don't know of any sanctions imposed by the Security Council. I
29 don't recall that.

1 Q. And if we look at page 8 of the document, paragraph 12:

2 "The authority strongly condemn the cowardly murder of
3 ECOMOG forces by Charles Taylor and the NPFL and paid tribute to
4 the courage and sense of sacrifice of all ECOMOG servicemen who
15:52:22 5 have fallen in Liberia."

6 So there, Mr Taylor, they are talking about those
7 Senegalese troops who were killed in Vahun, yes?

8 A. Yes, counsel. You know, you are reading from a communique
9 and you are asking your questions and the problem with these

15:52:42 10 documents is that exactly what happened. We've said the soldiers
11 were killed. We turned over their bodies. We said there was an
12 unfortunate situation. We dealt with it. But at this level
13 these are - again these are political documents. They have to
14 condemn it because they were peacekeepers and so I don't know the

15:53:03 15 point you are trying to arrive at, but this happened. I don't
16 think we have any disagreement about the communique and what
17 happened and all of that. But I do tell you that you know we
18 don't get peace until '96, so it shows you between 1992 there's
19 problems in 1993 and '94 and '95, okay. So this is unfortunate

15:53:30 20 and we made sure that not just ECOMOG but the Senegalese
21 understood we were very, very - we turned over the bodies. We
22 did everything that we could and we did say that it was a very,
23 very terrible and unfortunate error. So I mean I don't know
24 where you are trying to drive with this, but we don't have any
15:53:51 25 disagreement with the communique. I don't.

26 Q. Thank you for that, Mr Taylor. Then if we look at page 8
27 as well decision A/DEC.8/7/92 relating to sanctions against
28 Charles Taylor and the National Patriotic Front of Liberia. Then
29 there's an introductory section from the Authority of Heads of

1 State and Government and if we turn to page 9, just above

2 "Decides" we see:

3 "Convinced that much more could have been achieved but for
4 the lack of cooperation by the NPFL which frustrated all attempts
15:54:37 5 by ECOMOG to implement the terms of the Yamoussoukro accord,
6 noting that the uncooperative conduct of the NPFL especially with
7 regards to the encampment and disarmament of its combatants and
8 the insertion of a buffer zone along the Liberia-Sierra Leone
9 border continued to pose a serious threat to the peace stability
15:55:29 10 and security of the West African region decides," and then under
11 Article 3, "Unless Charles Taylor and the NPFL comply fully with
12 the implementation of the said programme, the authority shall
13 impose comprehensive sanctions against Charles Taylor and the
14 NPFL-controlled areas of Liberia, and any other party that fails
15:56:00 15 to comply with the implementation of the programme."

16 And article 4: "All the member states of ECOWAS shall take
17 all necessary measures to give full effect to this decision."

18 Mr Taylor, before we go forward, could you tell us at this
19 point in time what were the areas in Liberia over which your NPFL
15:56:25 20 had control?

21 A. We're talking about --

22 Q. July 1992.

23 A. By this time we have control of Bong County. We are
24 controlling the southern - southwestern part of Liberia. By this
15:57:02 25 time in 1992 we've lost Lofa. We've lost Lofa County, so we
26 don't have control. So when they are talking about the border
27 area here, and that's what they mean by "any other force," by
28 this time there's another force and this is the conflict,
29 counsel. The other force on the ground is ULIMO. But ULIMO is

1 being armed and equipped by ECOMOG. So this is the conflict with
2 all these difficulties and I'm saying you see why these keep
3 rolling and rolling. And the reason why in these agreements you
4 are seeing the NPFL, NPFL, NPFL because ULIMO has been brought in
15:57:46 5 and is fighting alongside ECOMOG.

6 So by this time we - Lofa, Cape Mount, Bomi and that side
7 is controlled by ULIMO. The NPFL is controlling Bong County,
8 Margibi County, Grand Bassa County and going southeastward. And,
9 you know, I've called the counties' names, but if we get a chance
15:58:12 10 if we look at the map you'll see what I'm talking about. But at
11 this particular time that entire Lofa, Cape Mount, Bomi area is
12 controlled by ULIMO. We are only in control of Bong County up to
13 the bridge I'm talking about.

14 Q. Mr Taylor, what county is Vahun in?

15:58:27 15 A. Vahun is in Lofa County.

16 Q. Thank you. Now, if we look at Article 6, this article
17 simply restates the invitation to the Secretary-General of the
18 United Nations to take all necessary measures to facilitate the
19 verification and monitoring of the electoral process, but more
15:58:53 20 importantly in number 2, the authority extends a similar
21 invitation to the International Negotiation Network of President
22 Jimmy Carter. Mr Taylor, at this point in time had time for
23 elections been set in Liberia?

24 A. Yeah. Well, yes. Depending on the outcome of the
15:59:19 25 disarmament. By time - I don't think we were so specific about
26 dates. By time, it was agreed that disarmament, demobilisation
27 and elections. So, yeah, elections were on the card at this
28 particular time.

29 Q. No time set though? It was dependent on these other

1 conditions having been met?

2 A. I want to - it's been so long. Yeah. I don't think any
3 specific date like January 1 or December this there would be
4 elections. I think it was just time structured, disarmament,
15:59:58 5 demobilisation and election, to the best of my recollection. I
6 don't recall a particular month or a date that was given for
7 election. I don't recall that. It very well could have been.

8 Q. And then in Article 7: "The authority strongly condemns
9 the murder of some ECOMOG forces by Charles Taylor and the NPFL
16:00:18 10 and pays tribute to the courage and sense of sacrifice of all
11 ECOMOG servicemen who have fallen in Liberia."

12 A. Yes.

13 Q. Mr Taylor, at this Dakar conference, they were pretty harsh
14 on the NPFL, weren't they?

16:00:36 15 A. One can say so, yes. That's why we didn't get peace,
16 because nobody seemed to understand. That's why we didn't get
17 peace until later.

18 Q. Now, by August 1992, the different armed factions in
19 Liberia had killed about 100 of the ECOMOG peacekeepers in that
16:00:57 20 country. Isn't that correct?

21 A. I'm not sure where you get the statistics from, but I know
22 I can say with certainty that, because of the fighting, ECOMOG
23 did lose some soldiers in Liberia. Quite frankly, I don't know
24 the numbers, counsel. If you have the statistics there, I'll go
16:01:20 25 along with you.

26 Q. And by August 1992, your NPFL held several hundred ECOMOG
27 hostage. Isn't that right?

28 A. That is not correct.

29 Q. That's not correct?

1 A. Not hostage. We did not hold anybody hostage.

2 Q. What do you call it, Mr Taylor? Were you holding several
3 hundred ECOMOG troops in August '92?

4 A. We stopped several ECOMOG troops because of their
16:01:45 5 hostilities and we asked their commanders to send vehicles. They
6 were put in those vehicles and driven to Monrovia.

7 Q. How long were they held by you before that was done?

8 A. Until their commanders - until the trucks came to pick them
9 up. No one was hurt in the process. They were not held hostage.
16:02:05 10 They were treated properly. So they are not hostages and they
11 were sent to Monrovia.

12 Q. You kept their uniforms and weapons. Isn't that correct?

13 A. We kept their weapons, but they took their uniforms.

14 Q. And at this point in time, the ECOMOG commander ordered
16:02:20 15 that all of the peacekeepers be brought back to Monrovia and
16 quartered there. Isn't that right?

17 A. Yes. At that particular time, that's why I said - and I'm
18 glad you've recognised it now that they were not hostages - they
19 were turned over and everybody was ordered back to Monrovia and
16:02:41 20 we sent them back to Monrovia. And so they were not hostages.

21 Q. So we had a countrywide deployment that began in April 1992
22 and by August, all of ECOMOG had been ordered back to Monrovia.
23 That's the correct sequence, is it not?

24 A. That's the essence of conflict, yes.

16:03:06 25 Q. And as you've already said, at least several hundred of
26 these withdrawing forces, their arms and ammunition were kept by
27 the factions in whose area they found themselves, yes?

28 A. That is correct.

29 Q. And in August and September of this year, the NPFL and

1 other factions continued attacks against ECOMOG. That's correct,
2 is it not?

3 A. Oh, they were fighting, counsel. When the peacekeepers
4 come and become the belligerent group, they were fighting. I can
16:03:41 5 describe it as we were under attacks, other factions were under
6 attack, and we had a crisis. So I would say - I would say yes.

7 Q. And these several hundred ECOMOG peacekeepers that you held
8 and then released, you released them after Jimmy Carter
9 intervened on their behalf. Isn't that right?

16:04:03 10 A. No. No. Jimmy Carter could have come at the time. He was
11 in Liberia during the crisis, but he did not intervene in trying
12 to get them released. We had these people picked up. They were
13 asked to assemble. They did. And we called to Monrovia because
14 we had a radio link with the - with ECOMOG. There was a
16:04:29 15 dedicated - a dedicated channel that we could call ECOMOG and
16 asked them for trucks to be sent and they sent them. It was not
17 through the intervention of Jimmy Carter.

18 Q. Mr Taylor, by the end of October 1992, in response to your
19 Operation Octopus, ECOMOG had increased its numbers to around
16:04:49 20 10,000 in the country. Isn't that right?

21 A. I'll leave that with you, counsel. I don't know the
22 military numbers of ECOMOG. I can say with certainty that they
23 had increased it. And that's the whole point of what octopus was
24 all about. The conflict over time, no resolution and the
16:05:12 25 belligerent nature of ECOMOG - I mean Octopus. But as to
26 ECOMOG's amount, I'm sorry, you could be right. They could have
27 been 10,000. I don't know. I don't really know.

28 Q. But by January 1993, Senegal had actually withdrawn its
29 1,200 peacekeepers. Isn't that correct?

1 A. I would say that's fair, yeah.

2 Q. Now, the conditions that you were given at the Dakar
3 conference, that you comply fully with the implementation of
4 Yamoussoukro IV, you didn't comply with that, did you?

16:05:57 5 A. I couldn't have. No, I didn't.

6 Q. Now, there was some delay with putting sanctions into
7 place, but eventually the sanctions that were discussed at Dakar
8 were put into place, were they not?

9 A. What are you talking about? 1993 or 4?

16:06:20 10 Q. Well, wasn't it true that in October 1992 the sanctions
11 regime was again put forward?

12 A. But you're asking me when it was implemented. I remember
13 in 1993 or thereabout, there were some, if I'm not mistaken,
14 economic or other sanctions that were talked about, but that
15 would be 1993, isn't it?

16:06:44 15
16 Q. Now, if perhaps we could look at this same exhibit,
17 MFI-276, at page 13 of that exhibit. If we look at the
18 right-hand column: "Decision A/DEC 1/10/92 relating to the
19 implementation of decision A/DEC.8/7/92 on sanctions against
16:07:31 20 parties to the Liberian conflict which failed to comply with the
21 implementation of the Yamoussoukro accord of 30 October 1991."
22 And, again, "Heads of State and Government of the ECOWAS Standing
23 Mediation Committee and the Committee of Five set out various
24 preliminary matters." Yes, Mr Taylor?

16:07:58 25 A. Yes.

26 Q. "Including recalling the decision A/DEC 8/7/92 of the 15th
27 Session of the Authority of Heads of State and Government held at
28 Dakar on 29 July 1992 relating to the imposition of sanctions
29 against combatants in the Liberian crisis. Deploring the fact

1 that the NPFL has failed to cooperate with the field commander of
2 ECOMOG in the implementation of the Yamoussoukro IV accord,
3 particularly with regard to the disarmament and encampment of
4 combatants, the creation of a buffer zone along the Sierra
16:08:57 5 Leone-Liberia border, the creation of the necessary conditions of
6 peace and security conducive to the holding of free, fair and
7 democratic elections in Liberia."

8 And then if we go over the page to page 14: "Considering
9 that such action constitutes a serious threat to the peace and
16:09:21 10 security of Liberia in particular and the West African region as
11 a whole determined to secure the compliance of all combatants
12 including in particular the NPFL with the provisions of the said
13 accord decides."

14 And we look at Article 1: "Member states shall impose
16:09:43 15 sanctions against any party to the Liberian conflict which fails
16 to comply with the implementation of the Yamoussoukro IV accord
17 and in particular against the National Patriotic Front of Liberia
18 (NPFL) led by Charles Taylor. Accordingly, member states shall
19 impose the sanctions set out below."

16:10:06 20 And if we look at Article 2: "Member states shall prevent
21 the export from their territories to the territory of Liberia
22 under NPFL control of weapons or any other military equipment
23 whether or not originating in their territories as from the date
24 of this decision; B, member states shall prevent the import into
16:10:36 25 their territories of all commodities and products originating
26 from the territory of Liberia under NPFL control and exported
27 therefrom as from the date of this decision."

28 Mr Taylor, in B here, where they are talking about "member
29 states shall prevent import into their territories of all

1 commodities and products originating from the territory of
2 Liberia under NPFL control", what are they talking about there?
3 What were you exporting?

4 A. I don't know what they are talking about, really.

16:11:15 5 Q. At that time, what were you exporting from your
6 territories?

7 A. The only thing that - things that were coming out of
8 Liberia at the time, we had rubber and timber, were the two items
9 that were being exported from Liberia. Rubber from Firestone and
16:11:36 10 timber from the local timber companies that had been working.

11 These were the only two exports from Liberia at the time.

12 Q. And you were exporting those to where?

13 A. Firestone was exporting rubber to the United States and
14 timber was being exported to different parts of Europe by the
16:12:00 15 timber companies. What they are doing here, if I'm understanding
16 this, they are preventing that. These are originating from our
17 territories. We are not specifically doing the exportation, but
18 we do benefit from the exportation. What they are trying to do
19 here is to deny those benefits to us. But rubber is still being
16:12:22 20 exported by Firestone and at some point it stops. But these are
21 the only two things that are coming from our area, rubber and
22 timber.

23 Q. The timber that was being exported, by what route was it
24 being exported?

16:12:36 25 A. It was being exported through the ports of Buchanan. It
26 was being exported through the Port of Greenville in Sinoe
27 County. That's on the map. It was also being exported from
28 Maryland County into La Cote d'Ivoire. So these were the areas
29 of export.

1 Q. And do you know when it was in Cote d'Ivoire, was it
2 exported - any of that timber exported out of the Port of San
3 Pedro?

4 A. Yes, I want to believe so, yes. What the companies did,
16:13:14 5 they moved from the port in Maryland, which is at the
6 southeastern tip of Liberia, to San Pedro is a very short
7 distance. I think no more than 2, 3 hours of sailing time. So
8 because of the crisis in Liberia, what - most of these companies
9 were stationed in La Cote d'Ivoire. They would move the timber
16:13:36 10 to San Pedro and then export out of San Pedro. But, yes, you are
11 right about that.

12 Q. And what companies were involved in the timber exports at
13 this time? Remember the names of any of them?

14 A. Oh, counsel. If I remember, you had - I mean I could
16:14:02 15 almost call the names of the individuals. I can remember that
16 better than the name of the company. There's a company owned by
17 the Fawaz brothers. These people have been in Liberia for some
18 30 or more years. I forgot the name of their timber company.

19 Q. Do you remember their first names, the Fawaz brothers?

16:14:27 20 A. The brothers, you have Abbas. I think Abbas is the first
21 name of one of the brothers and they were long time timber people
22 from the Tubman years in Liberia. By Tubman I mean way in the
23 50s and 60s. They were at least I would say - there was an
24 Italian fellow that exported out of there. I don't know the name
16:14:52 25 of that company. But there were about four or five companies
26 exporting timber at the time.

27 What we did during the war, counsel, the companies that
28 were working, we did not disrupt their work. It may take me to
29 research it, but I don't remember the names of the companies, but

1 there were at least four companies that were still doing
2 business. They would do their regular business and all we were
3 doing, we would - instead of paying taxes to Monrovia, they would
4 pay taxes to the NPFL.

16:15:25 5 Q. And could you help us with the spelling? You said the
6 Abbas brothers. Could you spell Abbas for us?

7 A. Abbas, I think it's A-B-B-A-S or A-B-A-S. It's a Lebanese
8 name. Fawaz I think is F-A-W-A-Z.

9 Q. So Abbas Fawaz was one of the brothers?

16:15:49 10 A. That's correct. I don't know the name of the company, but
11 they were old timber people in Liberia from Tolbert time in the
12 60s.

13 Q. The Fawaz brothers, were they Liberian citizens?

14 A. More like, because they did not have - because of the
16:16:07 15 constitution of Liberia - these boys were born in Liberia. They
16 were born in Liberia, brought up in Liberia, went to school. You
17 wouldn't tell the difference between the way they speak and
18 Liberians. The problem is that according to the constitution of
19 Liberia, no Caucasian can be granted citizenship. Some people
16:16:25 20 have said it's the most racist constitution in the world still,
21 but to the best - they are married to Liberian women. In fact
22 one of the brothers is married, all his children are Liberians.
23 So to the extent that they were Liberian citizens, legally no,
24 but they surely felt like they were citizens.

16:16:42 25 Q. You said you benefitted from these timber exports. How did
26 the NPFL benefit from them?

27 A. We controlled the area, counsel, and instead of paying
28 taxes to the Liberian government in Monrovia to Samuel Doe, we
29 made sure that they paid taxes to the NPFL. And where they

1 refused - in fact there were a couple of occasions where because
2 of the legality arising, they refused and so we shut them down
3 and threw them out and most of the timber remained in the ports
4 until peace, until I was elected President.

16:17:27 5 Q. And when was that? Do you remember when you shut them down
6 and threw them out?

7 A. I would say that would be around '93 or thereabouts.

8 Q. Now you talk about taxes to the NPFL. During this time you
9 had your NPFL and then you had the NPRAG, correct?

16:17:46 10 A. That is correct.

11 Q. So the taxes went to the NPFL?

12 A. The NPRAG, to the government.

13 Q. And what entity within the NPRAG actually would receive
14 these tax monies, tax proceeds?

16:17:59 15 A. We had ministries. We had the Finance Ministry. They
16 received the taxes.

17 Q. Did anyone else in your NPRAG receive taxes or other
18 proceeds that were paid formally to that organisation?

19 A. No, no, no. We had a structure there, counsel. That was
16:18:20 20 well structured where the money was paid through the normal
21 channel. They were issued receipts and what we said, because the
22 NPRAG was recognised by ECOWAS under one of the Yamoussoukro
23 agreements, we - in fact the companies insisted on official
24 receipts because they were concerned that during peacetime they
16:18:50 25 did not want any government coming in and blaming them for paying
26 monies to the NPRAG. So what we did, we issued them receipts and
27 those receipts remained with those companies and they could show
28 them as evidence that they complied with the laws since two
29 governments existed at the time.

1 Q. And so it was the Finance Ministry within the NPRAG that
2 would receive these monies?

3 A. That is correct.

4 Q. No other ministries or offices?

16:19:18 5 A. No, only the Finance Ministry would collect all of the
6 revenues.

7 Q. Mr Taylor, if we go back to this document on page 14,
8 member states shall prevent, number (c) is:

9 "Any activities by their nationals or in their territories
16:19:42 10 which would promote or are calculated to promote the export or
11 transshipment of any commodities or products from the territory
12 of Liberia under NPFL control or the import or transshipment of
13 weapons or any other military equipment into the territory of
14 Liberia under NPFL control."

16:20:03 15 A. Yes.

16 Q. Then, Mr Taylor, if we look at Article 3, it prohibits
17 member states from making available and here it says:

18 "To the so-called National Patriotic Reconstruction
19 Assembly Government of Charles Taylor and the NPFL or to any
16:20:33 20 commercial, industrial or public utility undertaking in areas
21 under NPFL control, any funds or any other financial or economic
22 resources and shall prevent their nationals and any persons
23 within their territories from removing from their territories or
24 otherwise making available to that government, or to any such
16:20:59 25 undertaking, any such funds or resources, except payments
26 exclusively for strictly medical or humanitarian purposes and in
27 humanitarian circumstances foodstuff."

28 So Article 3 seems to be saying that you were allowed to
29 receive for strictly medical or humanitarian purposes certain

1 amount of support, yes?

2 A. Yes, that's consistent, yes.

3 Q. If it was for humanitarian circumstances, also foodstuff?

4 A. Yes, that's what it says.

16:21:37 5 Q. And then in Article 4:

6 "Member states shall refrain from any action or dealing
7 that might be construed as a recognition of the authority and
8 control of the so-called National Patriotic Reconstruction
9 Assembly Government or the NPFL over any part of the territory of
10 Liberia."

11 So, Mr Taylor, if the NPRAG was recognised, why in Article
12 4 do they tell member states to refrain from any action or
13 dealing that might be construed as recognition of the authority
14 of the NPRAG?

16:22:22 15 A. Or the NPFL. Or the NPFL. So in terms of recognition,
16 counsel, you can see then that when you are dealing with these
17 political statements they say the NPRAG or the NPFL. So we're
18 just going to evaporate? Okay, you don't recognise the NPRAG.
19 Don't you recognise the NPFL? So do we evaporate? So this is
16:22:47 20 also diplomatic language. We were exporting timber across the
21 border into Guinea from Ganta. We were exporting into the free
22 ports in San Pedro. So so-called - and these are pressures that
23 are put on during the crisis, counsel. So I mean, they talked to
24 us years right after this and years and months after, '94 and
16:23:15 25 '95.

26 So I guess when you are looking at these, these are all
27 pressure points designed in these political and diplomatic
28 agreements to get things going. That's all I can say about that.
29 But to say that - if you are trying to allude to the fact that

1 the NPRAG was not recognised, that is not true. We could get
2 into discussion on what is meant by "so-called" as if - as to say
3 you are calling yourself. That would be far from being cynical.
4 But I think, you know, to answer your question, the NPRAG was
16:23:54 5 recognised and they continued to talk to us even beyond this.

6 Q. Mr Taylor, one question going back to the Dakar meeting.
7 Was it in the Dakar meeting that there was a decision or an
8 agreement that ECOWAS would ask the United Nations to send
9 observers? Do you recall that?

16:24:21 10 A. I really don't. We're talking about Dakar in what year?

11 Q. 1992.

12 A. 1992. I don't recall, counsel. I'm sorry, I don't recall.

13 But all I can do in helping you is that it would have been a
14 possibility because we were always calling for international

16:24:51 15 observers, so I would not be shocked if that was called for, I
16 would say. And I would listen to your input on this. I don't
17 really know the direct detail, but it's a possibility.

18 Q. Mr Taylor, do you remember at some point, October 1992, a
19 nine-member monitoring committee was created that included Benin,
16:25:24 20 Burkina Faso, I a Cote d'Ivoire --

21 A. Yes.

22 Q. -- Gambia, Ghana, Guinea. Do you remember that?

23 A. Yes. There was an expansion from five to nine. I remember
24 that, yes.

16:25:34 25 Q. And the membership included Benin. Do you remember that?

26 A. Yes.

27 Q. Burkina Faso?

28 A. Yes.

29 Q. Cote d'Ivoire?

- 1 A. Yes.
- 2 Q. Gambia?
- 3 A. Yes.
- 4 Q. Ghana?
- 16:25:47 5 A. But on the expansion, Ghana was a member of the first five.
- 6 Q. No, I'm talking about now the nine?
- 7 A. Yes, Ghana, yes.
- 8 Q. And Guinea?
- 9 A. Yes.
- 16:26:00 10 Q. Nigeria?
- 11 A. Yes.
- 12 Q. Senegal and Togo?
- 13 A. That is correct.
- 14 Q. That's right?
- 16:26:01 15 A. Yes.
- 16 Q. In November 1992 this monitoring committee met in Abuja.
- 17 Do you recall that?
- 18 A. November 1992?
- 19 Q. November. 7 November?
- 16:26:33 20 A. That's possible. That's possible, yes.
- 21 Q. It would have been the first meeting of this monitoring
- 22 Committee of Nine on the Liberian crisis?
- 23 A. I'm sure you wouldn't mislead anyone about that. I believe
- 24 you, counsel.
- 16:26:48 25 Q. And, Mr Taylor, if we can look again at this MFI-276. Page
- 26 15 shows the first meeting of the ECOWAS monitoring Committee of
- 27 Nine on the Liberian crisis, Abuja, 7 November 1992, and it's a
- 28 final communique. Do you have that before you, Mr Taylor?
- 29 A. Yes, I do.

1 Q. And then if we look at page 16 and if we look at paragraph
2 6 wherein the chairman stated that the purpose of the meeting was
3 to assess the extent of implementation of the Yamoussoukro IV
4 accord?

16:27:52 5 A. Yes.

6 Q. And he notes that hostilities had continued frustrating all
7 efforts to restore peace and the normal rhythm of life in
8 Monrovia and elsewhere in Liberia. Yes, Mr Taylor?

9 A. Yes.

16:28:08 10 Q. And then at paragraph 7, the meeting also received a
11 situation report from the field commander of ECOMOG in which he
12 confirmed that none of the warring factions had heeded the call
13 of the Cotonou meeting for a ceasefire. The field commander
14 stated that the National Patriotic Front of Liberia (NPFL) was at
16:28:34 15 the centre of the raging hostilities. On the one hand, it was
16 engaged in an arms struggle with the United Liberation Movement
17 of Liberia (ULIMO). So it was engaged in an arms struggle with
18 ULIMO for territorial control and, on the other hand, it had
19 mounted a massive military offensive against ECOMOG forces.

16:29:03 20 Now, Mr Taylor, here we are talking about 7 November 1992.
21 Now, this reference to the massive military offensive against
22 ECOMOG forces, they are here talking about Operation Octopus. Is
23 that correct.

24 A. I would - since they did not use the name, yes. But there
16:29:22 25 is Octopus around this time, yes.

26 Q. And Operation Octopus began in October 1992, correct?

27 A. Thereabout, yes.

28 Q. And this was a very large military operation by the NPFL --

29 A. That is correct.

1 Q. -- is that correct?

2 A. That is correct.

3 PRESIDING JUDGE: I think that might be an appropriate
4 time, Ms Hollis. We're just about out of tape, so we'll adjourn
16:29:44 5 for today. And, Mr Taylor, the usual warning not to discuss your
6 evidence with any other person. We'll adjourn until 9.30
7 tomorrow morning.

8 [Whereupon the hearing adjourned at 4.29 p.m.
9 to be reconvened on Tuesday, 17 November 2009
16:30:12 10 at 9.30 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

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CROSS-EXAMINATION BY MS HOLLIS	31641