



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

TUESDAY, 1 APRIL 2008
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr William Romans
Ms Sidney Thompson

For the Registry:

Ms Rachel Irura

For the Prosecution:

Mr Nicholas Koumjian
Mr Alain Werner
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Terry Munyard
Mr Morris Anyah

1 Tuesday, 1 April 2008

2 [The accused present]

3 [Open session]

4 [Upon commencing at 9.30 am]

09:29:41 5 PRESIDING JUDGE: Good morning. I note some changes of
6 appearance, Mr Koumjian.

7 MR KOUMJIAN: Yes, good morning your Honours. Alain
8 Werner, Maja Dimitrova and myself, Nicholas Koumjian, for the
9 Prosecution.

09:29:57 10 PRESIDING JUDGE: Thank you. Mr Munyard?

11 MR MUNYARD: Madam President, your Honours, myself, Terry
12 Munyard, and Morris Anyah for the Defence.

13 PRESIDING JUDGE: Thank you.

14 MR MUNYARD: Looking at my LiveNote, none of this is
09:30:06 15 currently on screen. I don't know if it is on your screen?

16 PRESIDING JUDGE: Yes, it is.

17 MR MUNYARD: Ah.

18 PRESIDING JUDGE: So, it may be a defect on yours.

19 MR MUNYARD: I think I am the only one. I have got
09:30:15 20 LiveNote open, but there is nothing other than the date.

21 PRESIDING JUDGE: Well since the date is the date it is
22 today, 1 April, possibly it is having you on, Mr Munyard.

23 MR MUNYARD: I am very grateful to both your Honour and to
24 Mr Anyah. I think I logged on too early and it is now requiring
09:30:35 25 me to reconnect.

26 PRESIDING JUDGE: Very well. Whilst you do that, if there
27 are no other matters I will remind the witness of his oath. No.

28 Mr Witness, you recall that yesterday you swore again to
29 tell the truth. That oath is still binding on you today. You

1 must answer questions truthfully. Do you understand?

2 THE WITNESS: Yes, my Lord.

3 PRESIDING JUDGE: Very well. Please proceed, Mr Munyard.

4 MR MUNYARD: Thank you, Madam President.

09:31:05 5 WITNESS: TFI-532 [On former oath].

6 CROSS-EXAMINATION BY MR MUNYARD [Cont.]:

7 Q. Mr Mongor, yesterday I reminded you that at some stage
8 during your evidence before the break it was put to you by
9 my learned friend, Mr Koumjian, that you were one of the top
10 commanders of the RUF, and in order that I can ensure complete
11 accuracy in what was put to you I have gone to the transcript of
12 your evidence of 10 March this year, page 5692, line 3, where he
13 asked you this question.

14 "So would it be correct to say then, Mr Witness, that you
09:31:50 15 as one of the three area commanders were among the top half dozen
16 or so commanders of the RUF?"

17 THE INTERPRETER: Your Honours, could counsel take it very
18 carefully so I can interpret to the witness?

19 MR MUNYARD: Very well. Shall I do it again?

09:32:07 20 PRESIDING JUDGE: I think he spoke clearly enough,
21 Mr Interpreter. Do you mean a little slower? I am not getting a
22 reply and so maybe, Mr Munyard, a little bit slower.

23 MR MUNYARD: I will do it again:

24 Q. This was the question, Mr Mongor, that was put to you.

09:32:27 25 "So would it be correct to say then that you, as one of the
26 three area commanders, were among the top half dozen or so
27 commanders of the RUF?"

28 Your reply was, "Please repeat that one", and Mr Koumjian
29 said, "Were you in the top command of the RUF?", and your answer

1 was, "Yes, I was one of them myself." So you were one of the top
2 half a dozen or so commanders of the RUF, weren't you?

3 A. Yes.

4 Q. Now, when we broke yesterday I was asking you about your
09:33:16 5 initial involvement with the NPFL and you told us that you
6 were captured by them and then you entered Liberia - sorry, you
7 were in Liberia in a village the name of which you don't know.
8 Are you able to help us where the village was in Lofa County?

9 MR KOUMJIAN: Objection, misstates. The witness said
09:33:49 10 Nimba. I think counsel just made an error.

11 MR MUNYARD: I am sorry, yes. I am grateful:

12 Q. Are you able to say where in Nimba County the village was?

13 A. Well, I had said that I don't know the name of the village.
14 I had said that before.

09:34:10 15 Q. We know that. I am asking you whereabouts in Nimba County
16 was it. Was it in the north, the south, the east, or the west?

17 A. Well, that village it is on the road that goes towards the
18 Ivory Coast border. That is where that village is located.

19 Q. Is this where you were trading?

09:34:49 20 A. Yes, that was the road I used when I was going and coming
21 back.

22 Q. There is one main trading road that goes from Nimba County
23 into La Cote D'Ivoire, isn't there?

24 A. It is not a single main road, because when you talk about
09:35:25 25 main road there were roads that entered Ivory Coast.

26 Q. Yes, the principal roads that enter Ivory Coast from Nimba
27 County are in the north at New Yekepa. Would you agree with
28 that?

29 A. Let him repeat that. Let me hear it clearly.

1 Q. I am going to suggest to you that there are two principal
2 roads that go from Nimba County into La Cote D'Ivoire; one right
3 in the north of Nimba County near New Yekepa, do you agree?

09:36:14

4 A. Well, that Yekepa that you are talking about is not the
5 area I am talking about.

6 Q. You are talking about the area of Loguatu, aren't you?

7 A. Along where? Where? Where?

8 Q. Loo or Loguatu?

09:36:44

9 JUDGE SEBUTINDE: Mr Munyard, perhaps you can spell some of
10 these words for us. We don't have a map.

11 MR MUNYARD: Yekepa is Y-E-K-E-P-A.

12 THE WITNESS: I am hearing Loguatu. Is that the place you
13 are talking about?

09:37:10

14 MR MUNYARD: Loguatu, which I am sure has various
15 spellings, can be spelt L-O-G-U-A-T-U-O. It also can be spelt
16 L-U-G-U-A-T-U, either E or O:

17 Q. Now you know Loguatu, don't you? That is the main road
18 that goes into La Cote D'Ivoire from Nimba County and that is the
19 main trading road, isn't it, at that point?

09:37:57

20 A. Yes, I know about the Loguatu that you are talking about.

21 Q. And that is where you are talking about, isn't it, the road
22 into La Cote D'Ivoire?

23 A. Yes, the road that goes towards that end.

09:38:23

24 Q. And is that where you say that you were captured by the
25 NPFL?

26 A. That is the road. That is where I saw the soldiers, yes.
27 It was on that road that I was captured in one village.

28 Q. And how near to the border with La Cote D'Ivoire were you
29 in this village where you were captured?

1 A. Well, there was a distance going towards the border. There
2 is - there was some distance.

3 Q. But were you near the road that crosses the border?

4 A. I was in one village, but not close to the road per se.

09:39:30 5 I was in the village, but not on the main road. I was a little
6 bit far from there.

7 Q. And how far from the border were you?

8 A. Well, I said there was some distance.

9 Q. Yes, can you tell us what distance? What sort of distance?

09:40:01 10 You know the area, don't you? You say you were trading across
11 the border?

12 A. Yes, I used to go there and return, but at that time the
13 route I used was not my usual route, so the distance that I am
14 referring to was a little bit far but not too far from where

09:40:34 15 I was captured. Although there was some distance, but it was not
16 too far. That is what I am trying to say.

17 Q. And you were captured, you say, in December of 1989. That
18 is what you have told us.

19 A. Yes.

09:40:54 20 Q. When in December 1989?

21 A. Well, I am unable to recall the particular date. I can't
22 tell you that now, because it has taken a long time and so
23 I can't recall the date.

24 Q. Was it before or after Christmas?

09:41:22 25 A. No, Christmas was ahead.

26 Q. Well, I want to be clear what you mean by that. When you
27 were captured was it before Christmas Day, or after Christmas
28 Day, in December 1989?

29 A. Well, I said Christmas had not yet reached. The Christmas

1 was a little far.

2 PRESIDING JUDGE: Mr Interpreter, that is not very good
3 English. What exactly do you mean?

4 THE INTERPRETER: It was not yet Christmas time.

09:42:16

5 MR MUNYARD:

6 Q. Right, so it was before Christmas. Are you sure about
7 that?

8 A. Yes, I am sure. I am sure about that.

09:42:35

9 Q. And it was some distance - a little distance - from the
10 border with La Cote D'Ivoire, yes? And some distance, but not
11 very far from the road that crosses at Loguatu. Is that right?
12 Am I putting correctly what you have told us?

13 A. Yes.

14 Q. And where was this village in relation to Gborplay?

09:43:18

15 A. Where do you call Gborplay?

16 Q. Well, Gborplay was the place that you told us about that
17 you were trained in.

18 A. Well, it is far from there. Gborplay is a little far from
19 there.

09:43:41

20 Q. Are you saying Gborplay is to the south of this place, this
21 village, where you were captured?

22 A. From that village to the place, I said it is a little far.
23 It is a little far to coming towards Gborplay. The place is a
24 little far from Gborplay.

09:44:10

25 Q. Is it between Loguatu and Gborplay?

26 A. The village where I was captured? Is that what you are
27 referring to?

28 Q. Yes.

29 A. Yes, the village is around that area.

1 Q. Let me be clear that you understood my question. Are you
2 saying that this village is somewhere between Gborplay and
3 Loguatuo?

09:44:59 4 A. I have told you that the village is far from the border,
5 the Ivory Coast border, and from the Loguatuo end that you are
6 talking about and from the village to Gborplay is also far, but
7 not very far. You can even walk by foot and go there, because
8 normally people use - go by foot.

09:45:40 9 Q. Right. And if you are going from the village to Gborplay
10 are you going north, or south, or east, or west?

11 A. Well, I don't know.

12 Q. Is it further up the country towards the top end of Nimba
13 County to get to Gborplay, or do you come down from this village,
14 further down towards the bottom end of Nimba County, to get to
09:46:12 15 Gborplay?

16 A. Well, Gborplay is going towards almost the end part of
17 Nimba County area. That is where Gborplay is.

18 Q. By the end part, what do you mean?

09:46:58 19 A. That is where Gborplay is located. That is what I am
20 talking about.

21 Q. And how long were you in this village when you were
22 captured?

23 A. Well, I did not stay long there.

24 Q. And so when did you first arrive in Gborplay, Mr Mongor?

09:47:34 25 A. Well, I am unable to recall the dates that I arrived at
26 Gborplay.

27 Q. Well, we know that you were captured before Christmas. How
28 long after Christmas was it that you arrived in Gborplay?

29 A. Well I was there at that time, because when we were

1 captured they took us to the place. That was where they had
2 their training base.

3 Q. You mean that you were taken pretty well straightaway to
4 Gborplay?

09:48:22 5 A. Yes, they took all of us there. Those of us who were
6 captured from that village, they took us to that place where they
7 were. That was their base.

8 Q. So, how long did it take you from when you were captured to
9 get to Gborplay? Did it take you a number of days?

09:48:47 10 A. No, they did not stay too long. The day we were captured
11 was the same day that we were taken to the base.

12 Q. And the base, let me be clear, you are talking about the
13 base at Gborplay, yes?

14 A. Yes.

09:49:10 15 Q. So, you arrived at Gborplay some time before Christmas?

16 A. Yes.

17 Q. And how soon after you got there did you start training at
18 Gborplay?

19 A. Well, training had already been going on. They had already
09:49:36 20 had their training base there, so we only went there and joined
21 the training.

22 Q. Mr Mongor, Gborplay as a training base was not opened until
23 around May of 1990. You are lying when you say that you were in
24 Gborplay before Christmas 1989, aren't you?

09:50:02 25 A. No.

26 Q. Tell us about the town of Gborplay. Describe the town,
27 please.

28 A. Well, I want to tell you that the town is a big town and
29 they have got a field there where we were being trained. It was

1 on the field that we were taking our training.

2 Q. Where did you live when you were having your training?

3 A. We were at the training base. That was where we were. And
4 they had some houses around the area and those of us, the
09:51:10 5 recruits, were living in those houses. In the morning they would
6 come and call on us and then we will fall in.

7 Q. And how long were you living in these houses being trained
8 before you went somewhere else from Gborplay?

9 A. I was there for about almost two months, but not exact when
09:51:46 10 we were graduated.

11 Q. You see, I suggest that at Gborplay the trainees, the
12 fighters being trained, were actually living in the forest
13 outside the town, not living on the base, and that if you were
14 ever trained at Gborplay you would not have been living in houses
09:52:11 15 on the base. What do you say about that?

16 A. Well I want to tell you that, when you are talking about
17 forest, people were not living in the forest. If you are saying
18 that they were living in the forest, I disagree with you.

19 Q. You are lying when you say that you were trained in
09:52:33 20 Gborplay living in houses as you just described, aren't you?

21 A. I am not lying at all.

22 Q. Who was your training commander at Gborplay?

23 A. There were many.

24 Q. Who was the principal training commander at Gborplay when
09:52:58 25 you were being trained there in December 1989, on your account?

26 A. Well they had somebody that was called Gborplay Devil, then
27 you have one General Musa, who was also there, and then there was
28 Pa Zobia. He was also there.

29 Q. Who was the training commander? What was the name of the

1 training commander at Gborplay in 1990 - 1989 to 1990? Give us
2 the name of the commander, if you can?

3 A. General Musa, he was there.

4 Q. That is completely wrong. Who was the deputy to General
09:53:53 5 Musa?

6 A. Well I don't know whether this was deputy, or that was
7 that.

8 Q. Do you know the name John Teah, T-E-A-H?

9 A. John Teah?

09:54:25 10 Q. Yes.

11 A. No, I don't know that name.

12 Q. Do you know the name Sam Sleshee, spelt S-L-E-S-H-E-E?

13 A. I don't know that name.

14 Q. You see, these were Special Forces trainers who were
09:54:57 15 running the training at Gborplay when it opened I suggest not
16 before May of 1990. Those were the people who were running the
17 training at Gborplay when you claim to have first got there, or
18 when you claim the NPFL first started training there?

19 A. Well maybe that is the name that you have, so the name that
09:55:31 20 you have is not the name that I know. That is what I am trying
21 to tell you.

22 Q. Where did you go when you had finished training? Where was
23 the first place you went to?

24 A. The first place I was sent was on the frontline.

09:55:58 25 Q. Yes, where on the frontline?

26 A. Well, at that time it was for us to go and fight around the
27 Ganta area.

28 Q. So you went right across to the other side of Nimba County,
29 did you?

1 A. Yes, that is the same Nimba County, but it is on the other
2 side, yes.

3 Q. And when did you get to Ganta?

09:56:54

4 A. Well, I can't recall that date to say that it was so and so
5 date that I arrived at Ganta.

6 Q. Well you say that you were training for a little less than
7 two months, which would bring us to the end of - well, it would
8 bring us to some time in February 1990. If you are captured
9 before Christmas, you have just under two months training and so
10 you must have gone to Ganta around February of 1990, yes?

09:57:15

11 A. I don't think it was in that February.

12 Q. When do you say it was? I am going on the figures that you
13 have been giving us.

09:57:45

14 A. But I didn't tell you about February. I don't think I have
15 told you about February, my Lord.

16 Q. You didn't. You told us that you were captured before
17 Christmas, yes?

18 A. Uh-huh.

19 Q. That is December?

09:57:54

20 A. Uh-huh.

21 Q. You were trained - you immediately went to Gborplay on the
22 same day, yes? That is what you told us?

23 A. Yes.

09:58:08

24 Q. You trained there, living in houses, for a little less than
25 two months? That is what you told us, yes?

26 A. Yes.

27 Q. And if you count December, a month from some time in
28 December brings us to some time in January and another month
29 brings us to some time in February, yes?

1 A. But if you talk about January and say it was in January
2 I might agree with you, but if you go straight to February
3 I disagree with you.

09:58:50 4 Q. Mr Mongor, can you count from one to two? You know the
5 difference between one month and two months, don't you?

6 A. Yes.

7 Q. If you were training in Gborplay for two months from
8 December, where does that bring us to? What month does that
9 bring us to?

09:59:05 10 A. Okay. Well, let us take it from the start of the December
11 month and in that time the other time we can almost say it was a
12 half month then you enter January.

13 Q. So, you are saying that you were captured some time at the
14 start of December? Is that what you are saying?

09:59:35 15 A. But that was what I told you. I said it was in December.
16 I said it was early December. That was what I said.

17 Q. All right, you haven't said that before, but I am quite
18 happy to work on that date now. In early December 1989 you were
19 captured by the NPFL forces in a village between Loguatuo and
10:00:01 20 Gborplay, yes? Is that accurate what I have just said?

21 A. That was what I said.

22 Q. Right. You then trained for two months, or just under,
23 which would bring us to around the end of January, wouldn't it,
24 of 1990?

10:00:32 25 A. Yes.

26 Q. And then you go right across Nimba County to Ganta on a
27 mission?

28 A. Yes.

29 Q. And how long were you on that mission?

1 A. Well, we were fighting to capture Ganta and we fought
2 against the government troops for a long time there.

3 Q. How long?

4 A. Well I can say we fought there for almost one week, because
10:01:27 5 whilst we were fighting they will push us back and then we will
6 also push them. So, that was how the fighting was going on.

7 Q. Did you get control of Ganta after the one week?

8 A. Yes, later we captured Ganta.

9 Q. So, how long was this first mission that you were on?

10:01:52 10 A. Well, I said almost a week. We were fighting around the
11 Ganta Town for almost a week.

12 Q. But once Ganta has been taken, who stays there to ensure
13 that it remains in NPFL hands?

14 A. The NPFL was there and the CIC at that time, who was
10:02:27 15 Mr Taylor, also came there to ensure that the troops was prepared
16 to make advancement.

17 Q. Did you stay there in Ganta?

18 A. Yes, Ganta was under NPFL control and we were there.

19 Q. Did you personally stay there once the NPFL had captured
10:02:58 20 Ganta?

21 A. No, I did not stay in the town. I did not stay there.

22 Q. So, how long were you on that first mission?

23 A. Well I had said the first mission to capture Ganta took
24 almost one week, that was what I told you, and once the place was
10:03:29 25 captured we advanced.

26 Q. To where?

27 A. We went towards the Gbarnga area because from Gbarnga you
28 will go to Gbarnga, but you had some other villages on the way
29 that you will pass through before you get to Gbarnga.

1 Q. Right. So, did you eventually get to Gbarnga?

2 A. Yes, we fought, but at that time Prince Johnson had already
3 captured Gbarnga so we came towards there to fight against Prince
4 Johnson.

10:04:23 5 Q. You told us before the break that you engaged the forces of
6 Prince Johnson. Did you eventually succeed in getting control of
7 Gbarnga?

8 A. Yes, we were able to get Gbarnga.

9 Q. And how were you able to get Gbarnga? Did you have to
10:04:52 10 fight your way in, or what?

11 A. Yes, we fought there. We fought starting in the evening.
12 We fought until the next morning before the man retreated and we
13 were able to get Gbarnga.

14 Q. Were you fighting actually in the town against Prince
10:05:22 15 Johnson's forces?

16 A. Yes, it was in the town.

17 Q. And did you have to inflict casualties on them in order for
18 you to get control of the town?

19 A. Yes, they had casualties because it was war and we were
10:06:00 20 playing with bullets. We also on our side incurred casualties.

21 Q. Why did you have to think about the reply to that question?

22 MR KOUMJIAN: Objection. That assumes facts in evidence.
23 I would also point out that we have interpretation and counsel
24 does not know when the interpretation finishes.

10:06:22 25 MR MUNYARD: I will ask it in a different way:

26 Q. Did you have to think about your reply to my question?

27 A. I will always wait, when the lawyer finishes speaking
28 I wait until the interpretation reaches me well before I say
29 anything.

1 Q. Did you have to think about your reply to my question?

2 A. It's not a matter of thinking. I normally wait for the
3 interpreter. After the interpreter completes what he is saying
4 before I answer your question, my Lord.

10:07:17 5 Q. Do you know anything about the circumstances in which the
6 NPFL captured Gbarnga from Prince Johnson's forces?

7 A. I want you to repeat it. Make it clear to me.

8 Q. Do you genuinely know anything about the circumstances in
9 which the NPFL captured Gbarnga from Prince Johnson's forces?

10:07:50 10 A. Yes.

11 Q. Are you seriously saying that there was fighting in the
12 town between you and his forces with casualties on both sides?
13 Is that your honest account?

14 A. Yes, there was fighting.

10:08:16 15 Q. And when do you say this happened? You have left Gborplay
16 some time in January and you have moved to Ganta. You're there
17 for about a week and then you move on to Gbarnga. When do you
18 say that you captured Gbarnga?

19 A. Well, I don't want to give you specific answer to that
10:08:57 20 because whilst we were fighting I did not recall dates, but all
21 that I can tell you is that in Gbarnga when we were fighting
22 I can say that that January that you are talking about, it was in
23 that same month that we pushed Prince Johnson's out of the town,
24 that we were able to take complete control of the town.

10:09:27 25 Q. In January of 1990?

26 A. Yes.

27 Q. About two months after you had first joined the NPFL?

28 A. Yes.

29 Q. Are you sure about that, Mr Mongor?

1 A. Yes.

2 Q. See I want to suggest that by the time the NPFL got to
3 Gbarnga Prince Johnson's forces had abandoned the town, it was
4 empty and there was no fight to gain control of it and there were
10:10:15 5 no casualties on either side?

6 A. I disagree with that totally. I told you that we started
7 fighting from the evening until the next morning. Yes, Prince
8 Johnson himself retreated, but whilst we were fighting we had
9 casualties. And even on Prince Johnson's side he also had
10:10:44 10 casualties. Yes, indeed he retreated, but you cannot just say
11 that it was as though we just marched and entered inside without
12 fighting. That one, I disagree with it.

13 Q. I also suggest to you that it took about a month for the
14 NPFL to gain control of Ganta. Not a week, a month?

10:11:16 15 A. It did not take us up to a month. The time we started
16 fighting, we started in the evening and we fought until the next
17 morning and it was that next morning that the man retreated from
18 the town.

19 JUDGE SEBUTINDE: Are you talking about Ganta or Gbarnga?
10:11:45 20 The question --

21 THE WITNESS: Gbarnga. I am talking about Gbarnga.

22 JUDGE SEBUTINDE: But the question related to Ganta. Am
23 I wrong, Mr Munyard?

24 MR MUNYARD: You are absolutely right, your Honour.

10:12:03 25 THE WITNESS: If you are talking about Ganta, it did not
26 take us up to one month. I disagree with one month business with
27 regards Ganta.

28 MR MUNYARD:

29 Q. Did you ever get involved in any fighting around Butuuo,

1 B-U-T-U-U-0?

2 A. I did not fight in Butuuo.

3 Q. So you know where Butuuo is, do you?

4 A. I heard the name, but I have never been there.

10:12:52 5 Q. You have never been there?

6 A. No.

7 Q. Do you know anything about the NPFL and Butuuo?

8 A. I cannot tell you anything about Butuuo with regards NPFL
9 affairs.

10:13:18 10 Q. You told us that you know the name, but you have never been
11 there. How have you heard the name? In what connection have you
12 heard the name?

13 A. I said I heard the name. I heard people call the name
14 Butuuo, but I have not been there. That is what I said.

10:13:41 15 Q. What have people said about Butuuo?

16 A. They said that NPFL fought at Butuuo.

17 Q. When did the NPFL fight at Butuuo according to what you
18 have been told?

19 A. Well, I can't tell you a specific time now to say that it
10:14:16 20 was so and so time that they fought there.

21 Q. Well, according to what you have been told, was it before
22 or after you were captured by them?

23 A. They had started fighting at Butuuo even before I became an
24 NPFL, that people told me about. So I did not fight at Butuuo
10:14:53 25 and I have never been there. I only heard the name.

26 Q. And I also want to suggest to you that the NPFL did not get
27 into Gbarnga until January or February of 1991. What do you say
28 about that, Mr Mongor?

29 A. I want to disagree with you.

1 Q. In other words, about a year later than when you say you
2 were involved in the bloody battle for control of Gbarnga?

3 A. It is not a year.

4 Q. Well, on your story when do you - when you get control of
10:16:00 5 Gbarnga how long do you then stay there, you yourself?

6 A. Well, when we captured Gbarnga, Gbarnga became the base.
7 That was where the NPFL headquarters was located. That place was
8 the headquarters of the NPFL and it was from there now that we
9 started fighting to capture that places.

10:16:46 10 Q. I may not have put this to you, but I should if I haven't:
11 The training period at the Gborplay base for all trainees was a
12 four month training period, not a period of less than two months.
13 So if you had been trained at Gborplay you wouldn't have left
14 there after less than two months. What do you say about that?

10:17:20 15 A. I want to tell you that the guerilla training that was
16 going on and the kind of manpower that they were looking out for,
17 so I can tell you that the people who were captured, they did not
18 train them like you can say a national soldier can be trained
19 with a particular standard time bracket where they will be
10:17:51 20 trained and graduate. It was a guerilla training, so sometimes

21 people were trained for a limited time. They just tell you how
22 to fire a gun. Those were the things that they taught people,
23 how to fire guns. It was guns that they brought to fight and
24 they tell you how to take over, to dodge your enemies's bullets
10:18:18 25 and how you can advance towards the enemy. Those were the things
26 that they were giving. The training was a fast track type of
27 training. It was not something that was standard that they will
28 say you take it for a standard time before you graduate. The
29 way - when people were graduated the other people would come to

1 the base again. That was how it was going on.

2 Q. Mr Mongor, when you were at Gborplay where was Mr Taylor?

3 A. Mr Taylor was in the town where the base was. That was the
4 town Mr Taylor was. That was where I first saw him.

10:19:10 5 Q. Who commanded his bodyguard then at Gborplay?

6 A. Well, at that time I was not part of the bodyguards. At
7 that time I was a recruit, so I can't tell you exactly who was
8 Mr Taylor's bodyguard commander.

9 Q. I see. Can you tell us who his aide-de-camp was?

10:19:43 10 A. I can't tell you that. I said I was a recruit. The people
11 who were with Mr Taylor who were trained people, I as a recruit
12 would not be brave enough at that time to go closer to those
13 people to go and ask them who is aide-de-camp to Mr Taylor, or
14 who is Mr Taylor's bodyguard commander.

10:20:14 15 Q. I see. So let us move on then to Gbarnga. You say that
16 you get there in January/February 1990 and do you then go - do
17 you remain there or do you go somewhere else once the town has
18 been captured?

19 A. I went somewhere.

10:20:43 20 Q. Where did you go?

21 A. We advanced and went to fight in Kakata going towards Bong
22 Mines.

23 Q. Right. So where are we now? What month are we in now?

24 A. What did you say?

10:21:15 25 Q. What month are we in now when you are going to Kakata,
26 towards Bong Mines?

27 A. Well, I can say that it was in the second month of that
28 year.

29 Q. And how long are you involved on that operation?

1 A. Well, we fought in Kakata and when we captured Kakata we
2 went to fight in Bong Mines. We had one man who was the
3 commander who was called Prince Quiwonkpa.

4 Q. How long were you on that operation?

10:22:21 5 A. Well, I can estimate it at two weeks when I was on that
6 operation before I returned to the headquarters.

7 Q. Then how long did you stay at the headquarters before you
8 went anywhere else?

9 A. I was now at the headquarters at that time when we will
10:23:05 10 take the CIC, Mr Taylor, to the front line. That was the time
11 the troops were now advancing to go to the capital city. That
12 was towards Coca-Cola factory. So at any time he was going to
13 the front line we will go with him and then return. That was how
14 it went.

10:23:28 15 Q. Are you saying you went with Mr Taylor to the Coca-Cola
16 factory at Monrovia?

17 A. Yes, Mr Taylor - as the fighters were advancing Mr Taylor
18 will come from the rear and then put his own gate, his own
19 checkpoint, and then we will refer to that checkpoint as the CIC
10:24:07 20 checkpoint. So as the fighters pushed again he will come from
21 the rear and then place his gates. That was how it went.

22 Q. Now you told us before the break that you had been told
23 that Mr Taylor was a soldier, that he was a commander. In what
24 army did you understand Mr Taylor had been a soldier?

10:24:30 25 A. Well, I heard that Mr Taylor was a soldier in the Doe army
26 before - even before he brought the war.

27 Q. Mr Taylor was a soldier in Doe's army? That's what you'd
28 been told, was it?

29 A. Yes, before.

1 Q. And before we move away completely from Prince Johnson
2 I just want to ask you this: Before the break you told us that
3 Prince Johnson and Mr Taylor were living in Gbarnga - sorry, in
4 Gborplay at the same time. Do you still maintain that?

10:25:33 5 A. What did you say? I want you to say that again.

6 Q. That Mr Taylor and Prince Johnson had both been living in
7 Gborplay?

8 A. I can't tell you that Prince Johnson and Mr Taylor were
9 both in Gborplay at the same time that I saw them. I don't think

10:26:05 10 I have ever said that here. I did not say at any point in time
11 that I saw both of them together. I knew that Mr Taylor was
12 fighting against Prince Johnson and that Prince Johnson too was
13 fighting against Mr Taylor.

14 Q. How long do you say it took for the operation to get to the
10:26:31 15 Coca-Cola factory?

16 A. Well, Mr Lawyer, I don't want to give you a specific time
17 here. It was a battle and my focus was on the battle, so I was
18 not recording to say it was so and so time. I can't tell you
19 that.

10:26:59 20 Q. Well, was it in February, the second month of the year, or
21 was it later than that?

22 A. That is what I am trying to tell you. I can't give you any
23 specific time to say that it was on this particular date that we
24 entered Coca-Cola factory and it was on this date that we left
10:27:26 25 there. That is what I am telling you. I am saying that I cannot
26 do that now.

27 Q. Mr Mongor, I am asking you in broad terms when was it. I'm
28 not asking you for specific dates. I want you to be able to tell
29 this Court how long each of these various operations took in

1 broad terms?

2 A. Well, I can't recall. It is something that has taken a
3 long time and my head is not a computer where I can store all of
4 those things and that when I want to recall them I will switch on
10:28:08 5 the computer for me to see it. That is what I am saying. That
6 is the reason why I am saying I cannot give you a specific time
7 now to say that it was so and so time that we captured the
8 Coca-Cola factory.

9 Q. Have you borrowed that expression, "My head is not a
10:28:31 10 computer" from someone else?

11 A. I am not together with somebody for me to borrow that from
12 him. I think the time I first came to this Court - I think
13 I said that here, even before we went on recess. So it is not
14 something I have learned from some other - something I have
10:28:58 15 learned from some other person.

16 Q. You certainly did say it before we went on recess but it
17 wasn't the first time we had heard that expression in this Court.

18 MR KOUMJIAN: Excuse me, is that a question? I don't think
19 it's appropriate to make comments. This is a time for questions.

10:29:15 20 MR MUNYARD: Let me put it another way.

21 PRESIDING JUDGE: We must avoid facetious remarks,
22 Mr Munyard. If you are putting a question, please put it.

23 MR MUNYARD:

24 Q. You used this expression before the break. What I am
10:29:33 25 suggesting to you, or what I am asking you rather, is: Is that
26 an expression you have heard from anybody else?

27 MR KOUMJIAN: Objection. Vague. In his life or at what
28 time?

29 MR MUNYARD: I am quite prepared to be more specific:

1 Q. Is that an expression you have heard from somebody else in
2 the last few months?

3 A. I did not hear that from anybody.

4 Q. Let us go back to the Coca-Cola factory, please. You're at
10:30:10 5 the base at Gbarnga before you set off on the mission that
6 eventually ends up at the Coca-Cola factory, yes?

7 A. Yes.

8 Q. How long had you been at Gbarnga at the base that you say
9 is established there in early 1990 before you leave on the
10:30:40 10 mission to the Coca-Cola factory? Was it days, weeks, months?

11 A. Well, I will tell you that it was just for a day and again
12 I want the Court to understand here that at that time it was not
13 just that people would just come and then base at the particular
14 point. The focus was on the battle front. But it was at Gbarnga
10:31:09 15 that the CIC made his base. All the ammunition that we were
16 using to fight were stored there, so we will only come there to
17 collect and then move. Sometimes when the CIC himself was moving
18 there we will move with him to go to the front line. So it was
19 not that I came there to reside there, or that I just came there
10:31:30 20 to spend a week and then go to the Coca-Cola factory.

21 Q. I'm going to ask you one last time: Roughly how long was
22 the mission to get to the Coca-Cola factory? How long did it
23 take?

24 A. I don't want to tell you about any date or time that we
10:32:05 25 took to go to the Coca-Cola factory. I have told you that I was
26 not counting. I was not recording to say that it was so and so
27 date that I arrived at a particular point. I did not pay
28 attention to that.

29 Q. Was it days, or was it weeks, or was it months?

1 PRESIDING JUDGE: Where actually are you starting from,
2 Mr Munyard?

3 MR MUNYARD: Leaving Gbarnga. Leaving the base on this
4 mission.

10:32:36 5 PRESIDING JUDGE: Yes, all right. You are clear on this
6 point, Mr Witness?

7 MR KOUMJIAN: Your Honour, if I could ask that the question
8 be clarified because the operation at the Coca-Cola factory, the
9 witness has said he travelled there with the CIC. It's not clear
10:32:51 10 to me whether we are talking about the time to capture the
11 Coca-Cola factory, the entire time that the forces were engaged
12 in fighting, the time that the witness was present at the
13 Coca-Cola factory and I'm not sure that the witness was there on
14 only one occasion. So I believe it's vague as to what is being
10:33:05 15 asked.

16 MR MUNYARD: I had hoped I was being specific, that I was
17 asking this witness about his movements and that is what I have
18 been asking him about:

19 Q. How long were you involved on a mission that went from the
10:33:23 20 base at Gbarnga and ended up at the Coca-Cola factory? Roughly
21 how long did that take? Was it days, weeks, or months?

22 A. I want to tell the Court that I did not go and fight at the
23 Coca-Cola factory and so I cannot tell you that it was so and so
24 date that they took over there, but I said it was there that we
10:34:03 25 had the CIC's headquarters for the frontline. So, at any time we
26 moved from Gbarnga it was there that we will go and then he will
27 base there and all the ammunition will be taken there. The 40
28 barrel missile and the 16 barrel missile were all taken there.
29 They were there. And the fighters will move ahead to enter the

1 city. So like the AA that I was controlling, I will just go at
2 the point in time and then give fire support at Coca-Cola factory
3 and then we will come back and explain to the CIC that the troop
4 has now reached so and so area. He was there at the Coca-Cola
10:34:53 5 factory. He will be there for some time and then in the evening
6 he will move again to go back to his base.

7 Q. You did answer me a little short time ago, I am looking on
8 my screen at page 25, line 1, "I can't give you any specific time
9 to say that it was on that particular date that we entered

10:35:16 10 Coca-Cola factory and it was on this date that we left there."
11 Now, were you saying that you yourself went to the Coca-Cola
12 factory with Mr Taylor?

13 A. I did not go with Mr Taylor myself to Coca-Cola factory.

14 Q. All right. Well I asked you, and this is page 23 at line

10:36:00 15 15 on my screen, "Are you saying you went with Mr Taylor to the
16 Coca-Cola factory at Monrovia?", and your answer was, "Yes,

17 Mr Taylor - as the fighters were advancing Mr Taylor will come
18 from the rear and then put his own gate, his own checkpoint, and
19 we will refer to that checkpoint as the CIC checkpoint." So, you
10:36:26 20 are now telling us something that contradicts what you told us
21 earlier when I asked you a very simple question. "Did you go to
22 the Coca-Cola factory with Mr Taylor?", and you said, "Yes". Now
23 you are saying, "No". What is the story to be, Mr Mongor?

24 A. I want the lawyer to know and I want to tell the Court that
10:36:55 25 the gate that I referred to as the CIC gate and the very
26 Coca-Cola factory, the place which was Mr Taylor's frontline
27 headquarters they had a checkpoint there and that checkpoint was
28 called the CIC gate and it was at the Coca-Cola factory. I did
29 not tell you that he was staying there. I told you that he will

1 only come there and then when the troops were advancing, so I did
2 not tell you something different.

10:37:43 3 Q. I asked you before, "Did you go to the Coca-Cola factory in
4 Monrovia with Mr Taylor?", and you said, "Yes". Are you now
5 saying that you should have said "No"?

6 A. What did you expect me to say? Why would I have said "No"?

7 Q. Right, I am going to move on, but before we move away from
8 this completely how long were you away from the base at Gbarnga
9 on the second mission? You told us about the first mission which
10:38:30 10 was to capture Gbarnga and you are then at the base at Gbarnga.
11 How long is it before you leave Gbarnga and go on another
12 mission?

13 A. Well, I want to tell you that Gbarnga was just a place
14 where Mr Taylor had established his base and those of us who were
10:39:07 15 the fighters, or the EMG people who were with him, we used to go
16 to the frontline. We would bring information and then we will go
17 back. We told him that the fighting was at a particular point
18 and we will say - we will tell him, explain to him, where the
19 defensive position was. So, it was actually not a place where
10:39:31 20 I came to spend a month, or weeks, but normally when I came and
21 I passed the night, in the morning we will be calling to
22 information and then we will have a parade. From there we will
23 go to the frontline again and in the evening again we will come
24 back. That was how I was doing.

10:39:51 25 Q. So, was there ever a time when you left Gbarnga after you
26 had first entered it? Was there ever a time when you left
27 Gbarnga for a period of days, or possibly longer?

28 A. Yes, I left Gbarnga. I told you I went to Kakata and later
29 we went to Bong Mines, but it was not up to a week when I said

1 I returned.

2 Q. Right. After that, when was the next time you left Gbarnga
3 for more than just a day and how long did you leave Gbarnga for
4 on this next occasion?

10:40:44 5 A. The second time, like what time are you talking about?

6 Q. After the trip to Kakata and Bong Mines, when is the next
7 time you leave Gbarnga for any period of time?

8 A. Well, since that time I did not go anywhere else and I told
9 you I came back to Gbarnga and I normally moved with the Pa, that
10:41:24 10 is Mr Taylor. At any time he was going to the frontline we will
11 go with him, and when he left there to go to Bong Mines I went
12 with him to Bong Mines. He was there for some time and then he
13 left there. And when - from when he came from Bong Mines and we
14 went to the Coca-Cola factory, where he had his frontline base,
10:41:47 15 we also took him there and then we will bring him back. That was
16 how we were moving.

17 THE INTERPRETER: Your Honours, the interpreter is sorry.
18 The interpreter is a little pressed and wants to use the rest
19 room. It is not - I do not intend at all to hold the Court to
10:42:06 20 ransom, but I am alone in the booth.

21 MR MUNYARD: Sounds a perfectly reasonable request to me.

22 PRESIDING JUDGE: How long will you be, Mr Interpreter?
23 You better go now and come back promptly, please.

24 THE INTERPRETER: Yes, yes.

10:44:57 25 PRESIDING JUDGE: Thank you.

26 THE INTERPRETER: Your Honours, thank you very much. The
27 interpreter is back.

28 MS IRURA: Your Honours, the interpreters are short staffed
29 hence the need for one of them to go out, but we are expecting

1 new interpreters. They are arriving today.

2 PRESIDING JUDGE: I will check this in the interval. Thank
3 you, Ms Irura.

4 Mr Munyard, please proceed. You are back in position all

10:45:22 5 right now, are you, Mr Interpreter?

6 THE INTERPRETER: Yes, your Honours, thank you.

7 PRESIDING JUDGE: Please proceed.

8 MR MUNYARD:

9 Q. Right, I just want to have an overview of where we have got

10:45:34 10 to on your evidence, Mr Mongor. From December of 1989 to some

11 time in about February of 1990, the NPFL have gone from the

12 border of Cote d'Ivoire and Liberia, they have got hold of

13 Gborplay, they have got Ganta - they have got Gborplay, they have

14 got Ganta, they then go straight from Ganta to Gbarnga and then

10:46:24 15 from Gbarnga they go down to Monrovia and they are at the edge of

16 Monrovia by about February of 1990. That is what your evidence

17 this morning amounts to, isn't it?

18 A. Yes.

19 Q. And you are saying that the NPFL were strong enough to do

10:46:55 20 all of that, to get from one end of the country, one side of the

21 country, to the capital in a matter of two to three months. That

22 is what you are saying, isn't it?

23 A. The NPFL was strong and most of the soldiers in fact

24 surrendered to the NPFL, so in some places fighting did not even

10:47:25 25 take place.

26 Q. How long do you say the battle for Ganta took?

27 A. I told you that it took almost a week, the battle for

28 Ganta.

29 Q. I suggest it took almost a month and that President Doe's

1 forces fought extremely strongly against the NPFL around Ganta
2 for at least - around a month?

3 A. My Lord, I disagree with that one month fighting that you
4 are talking about that you said took place in Ganta.

10:48:28 5 Q. Your evidence was that the NPFL goes straight from Ganta to
6 Gbarnga. Do you still stick by that?

7 A. That is what I am still saying, because it is a main road
8 from Ganta coming towards Gbarnga. That is the main road.

9 Q. I want to suggest to you that the NPFL went from Ganta to
10:49:13 10 Buchanan, not to Gbarnga? They went down to Buchanan?

11 A. My Lord, I disagree with you. Where I joined the NPFL,
12 from where I joined the NPFL and whilst we were fighting no group
13 went to Buchanan. The NPFL later divided groups that went to
14 Buchanan that captured Firestone and all those areas. Different
10:49:51 15 troops went that moved from Ganta to Gbarnga. So, my Lord, I
16 don't - I disagree with you that from Ganta the troops went to
17 Buchanan. No, I disagree with that.

18 Q. President Doe's forces, I suggest, were still fighting
19 around Ganta until the middle of 1990. Ganta didn't fall until
10:50:23 20 some time around mid-1990?

21 A. If you say mid-1990, I disagree to say that it went to
22 mid-1990.

23 Q. Of course you had gone off to join the RUF in early 1990,
24 hadn't you?

10:50:45 25 A. It was not early 1990 that I joined the RUF. If you are
26 talking about earlier - I know you are talking about the
27 beginning and it was not the beginning. Let's say in the
28 beginning - let's say up to three months that I was in Liberia
29 and after which I went to train the RUF. At that time there was

1 no fighting at Ganta. We were all at Gbarnga. So if somebody is
2 to tell me that we fought at Ganta for one month I disagree with
3 that totally.

4 Q. When do you say it was that you started with the RUF?

10:51:55 5 A. I had said that I went to the RUF base in the third month
6 of 1990 and it was almost at the end of the third month that
7 I went there.

8 Q. Right, so that is early 1990, isn't it, in the early part
9 of 1990?

10:52:37 10 A. Yes, yes, it was at the early time.

11 Q. You were with the RUF from then on, weren't you, Mr Mongor?

12 A. Yes, I was there with them.

13 Q. And you weren't with Mr Taylor at his Executive Mansion as
14 part of his bodyguard?

10:53:16 15 A. Well, I was part of the bodyguard when I had said to you
16 that I was moving with Mr Taylor when we go from Gbarnga to
17 Coca-Cola factory and sometimes from Gbarnga to Bong Mines, I was
18 with him all those times. And even at the ground where he was
19 based, sometimes I will come there and I will stay with him there
10:53:41 20 for some time and at any time he was going to the front line
21 I will go with him. So it was from that place that I went to the
22 RUF base.

23 Q. You told us that you were in his bodyguard and that your
24 boss, your overall boss, was called Cassius Jacobs. Do you
10:54:07 25 remember saying that on 10 March this year?

26 A. Repeat it again.

27 Q. Do you remember telling us that you were part of the
28 Executive Mansion Guard under Cassius Jacobs as your overall
29 boss?

1 A. Yes, Cassius Jacobs was the overall boss, that was what
2 I said, for the bodyguard commanders.

3 Q. What did Cassius Jacobs look like?

4 A. Cassius Jacobs is a dark person.

10:54:52 5 Q. A dark person? Darker skinned than you?

6 A. Yes, because I can say my own colour is lighter, but
7 Cassius Jacobs is darker than I am.

8 Q. What height was Cassius Jacobs?

9 A. Cassius Jacobs, I can say I am about the same height as
10:55:36 10 him.

11 Q. What height are you?

12 A. Well, I don't know my height, but maybe you can look at me
13 and then --

14 Q. My problem is that you're sitting down.

10:55:56 15 A. If you want me to stand I can stand.

16 Q. If you wouldn't mind standing up, yes. If you stand we
17 will then agree on what we all think your height is?

18 A. If the Court could permit me, my Lord.

19 PRESIDING JUDGE: Yes, please stand up, Mr Witness.

10:56:15 20 MR MUNYARD: I will let somebody else make an estimate.

21 MR KOUMJIAN: I think the witness is approximately 5 foot

22 9. I can stand next to him, if you'd like, for a comparison.

23 MR MUNYARD: I would be prepared to agree that.

24 PRESIDING JUDGE: [Overlapping speakers].

10:56:30 25 MR MUNYARD:

26 Q. Did he have any particular distinctive features? Was there
27 anything else that you can tell us about what he looked like?
28 Was there anything unusual about his appearance?

29 A. Well, I - whilst I was with him I did not see anything

1 about him that I will take note of, but at the time I was with
2 him he always had a hair cut.

3 Q. Can you tell us anything at all about his face apart from
4 the fact that he was darker skinned than you on your account?

10:57:37 5 A. Well, his face, he is a man whose eyeballs are not that
6 big. He had a broad nose. Those are the things that I knew
7 about his face.

8 Q. Anything about his skin that you can remember apart from
9 its colour?

10:58:16 10 A. I did not see anything on his body that I took note of that
11 I can recall to say that there was specific thing on his body.

12 Q. Well, I want to suggest to you that Cassius Jacobs was a
13 man about 6 foot tall, he is pale skinned and his face is
14 noticeable for pimples all over his face. What do you say about
10:59:19 15 that? I think my learned friend might want me to define pimples.

16 MR KOU MJIAN: No, it's just that the word was "he is" and
17 the evidence presented is that Cassius Jacobs was murdered so he
18 is not here for us to compare.

19 MR MUNYARD: If it was then I am quite happy to correct the
10:59:37 20 "is" to "was". In the witness's mind, and I am taking him back,
21 he is describing someone he is trying to remember. That is all
22 I am trying to establish.

23 PRESIDING JUDGE: Mr Koumjian, to be honest I don't recall
24 anything about the fate of Mr Cassius Jacobs but I will accept
10:59:55 25 your observation and the tense can be changed, Mr Munyard,
26 I think to accommodate that.

27 MR MUNYARD: Yes, of course:

28 Q. I am going back to the question again for a moment,
29 Mr Mongor. Cassius Jacobs, I suggest, was a man closer to 6 foot

1 than 5 foot 9 with pale skin, as pale as Mr Taylor, if not paler
2 than Mr Taylor, a lot paler than you and noticeably pimpled all
3 over his face?

4 A. My Lord, I want to disagree with you and I don't agree with
11:00:59 5 you at all. If you are talking about pimples, pimples was not
6 something that will be in somebody's face that you cannot cure.
7 Even myself sitting here, sometimes I get pimples all over my
8 face but I cure it again and it heals. Maybe at the time I was
9 not with them again he had pimples in his face, so I can't
11:01:30 10 disagree with that side, but at the time I was with him I did not
11 see pimples all over his face. My Lord, I disagree with that.

12 Q. And how many times do you claim to have seen Cassius
13 Jacobs?

14 A. The man was the bodyguard commander and he was with the
11:01:53 15 bodyguard unit at all times. Every morning he will call for
16 formation in parade and he will come to the parade. So I saw him
17 every time. Even when we went to the front line he will be
18 there.

19 Q. Finally, Mr Mongor, I want to suggest to you that Cassius
11:02:14 20 Jacobs did not become the commander of the Executive Mansion
21 Guard until some time around 1994 and that the time you're
22 talking about, 1990, he was not the commander of the executive
23 guard?

24 A. I disagree with you totally and it was not 1994 that
11:02:47 25 Cassius Jacobs became bodyguard commander for the Executive
26 Ground. That is a lie. I am telling you that the time I was
27 with the NPFL Cassius Jacobs was the commander. Even up to the
28 time Mr Taylor was at the Coca-Cola factory where he erected a
29 checkpoint whilst he was there, it was Cassius Jacobs who was the

1 EMG commander. And up to the time we went to Bong Mines until
2 the time we came to Firestone he was the EMG commander.

3 Q. You also told us on 10 March that you used to be in the
4 front vehicle whenever Mr Taylor moved around and that you were
11:03:30 5 the person who operated the heavy weapons and you were using the
6 anti-aircraft gun. Do you remember saying that, you were
7 operating it?

8 A. I recall that.

9 Q. When do you say you first operated, or were the person in
11:03:57 10 charge of the anti-aircraft gun as you drove Mr Taylor's escort,
11 or moved around in Mr Taylor's escort?

12 A. Say that again.

13 Q. When was the first time you claim that you were the person
14 who operated the anti-aircraft gun as part of Mr Taylor's escort
11:04:29 15 when he moved around the country?

16 A. The time I started operating the AA gun, first of all let
17 me tell you that I was the first person and I was with the man
18 who was initially operating the AA. He was one of Mr Taylor's
19 Special Forces and he was called Bullet Patrol. He later killed
11:05:06 20 the man and when he killed the man I took over the AA at that
21 time.

22 Q. Bullet Patrol you say was the first trainer of the AA. Is
23 that right?

24 A. No, I did not say he was the trainer. I said there was
11:05:27 25 another man who was called GR. He was the operator and I was the
26 gunner to him. So there was one Special Forces, who was called
27 Bullet Patrol. He killed GR for a woman, so I later took over
28 the AA and I was now using it.

29 JUDGE SEBUTINDE: Just a minute, please. Mr Interpreter,

1 did the witness say "GR" or "JR"? Mr Witness, did you say "JR",
2 or "GR"?

3 THE WITNESS: JR.

4 JUDGE SEBUTINDE: JR?

11:06:07 5 THE WITNESS: Yes.

6 JUDGE SEBUTINDE: Mr Interpreter, you are telling us
7 differently.

8 MR MUNYARD: It has got GR on the screen, or it had GR. It
9 is now JR.

11:06:22 10 THE WITNESS: JR. The man was called Junior, but we used to
11 call him JR.

12 MR KOUMJIAN: Your Honours, just one other minor point. On
13 page 40, line 6, the transcript has "Bullet Parole" and as
14 Mr Munyard picked up correctly in his next question it was Bullet
11:06:46 15 Patrol. And, just a little in defence of the interpreter, I have
16 in mind that the witness does have a Liberian accent, although he
17 is speaking Krio, and so it is difficult for them to understand
18 all of his pronunciations.

19 MR MUNYARD: I thought he was speaking English, but it
11:07:07 20 doesn't matter.

21 JUDGE SEBUTINDE: Even we, who don't understand these
22 languages, heard differently.

23 MR MUNYARD: Your Honour, can I move on, or move back
24 actually to the question:

11:07:18 25 Q. Who trained you in the use of the AA gun?

26 A. Well, if I tell you that somebody trained me, it was the
27 man who was with the AA and I was a gunner under him. He was the
28 person who was showing me how to fire, because I was always with
29 him at the time we were going to the frontline and I used to move

1 with him. So, it was based on that that I was also able to fire
2 the AA and I was able to operate it.

3 Q. So you just learned on the job how to operate the heaviest
4 peace of weaponry, is that what you are telling us?

11:08:08 5 A. Yes, I said I learnt that from the man under whom I was and
6 I was a gunner to him.

7 Q. From Bullet Patrol?

8 A. Bullet Patrol? I am not talking about Bullet Patrol. I am
9 talking about the man whose name I called. I said JR, the man
11:08:39 10 who was the operator for the AA. I was a gunner to him.

11 Q. And one shot the other one? Killed the other, yes?

12 A. Yes, Bullet Patrol, who was the Special Forces, killed JR.

13 Q. Was Bullet Patrol disciplined for that?

14 A. No action was taken.

11:09:06 15 Q. So there was no disciplinary system operating then, was
16 there?

17 A. There was no discipline. Mr Taylor's Special Forces did
18 whatsoever thing they wanted to do because they were Special
19 Forces.

11:09:30 20 Q. When did you first move with the AA gun, Mr Mongor?

21 A. I can't recall the date.

22 Q. I am not asking you a specific date. Was it before you
23 went off to join the RUF?

24 A. I said I joined the RUF in the - at almost the end of the
11:10:03 25 third month in 1990. That was the time Mr Taylor sent me to go
26 and join the RUF.

27 Q. Yes, I didn't ask you about that. I said was it before you
28 went off to join the RUF that you first moved with the AA gun?

29 A. Yes, before I moved to go to the RUF.

1 Q. Right, thank you. How were you able to do that if the NPFL
2 did not have an AA gun in 1990, or would you - I will rephrase
3 that. I suggest that the NPFL didn't have an AA gun in 1990.

4 A. My Lord, I want to disagree with what you are saying.

11:11:03 5 There was an AA gun and it was not even one. We had a twin
6 barrel. We had the single barrel. They were all there. So if
7 somebody is telling you that, or if you are claiming that at that
8 time the NPFL never had those weapons, then I want to disagree
9 with you. They were there.

11:11:31 10 Q. I am suggesting when they had those weapons it was much
11 later on, by which time you were fully occupied with the RUF?

12 A. I want to tell you that those weapons were there even
13 before I left to go to the RUF. A 40 barrel, a twin barrel AA,
14 16 barrels, they were all there.

11:12:00 15 Q. And what sort of vehicle was it that Mr Taylor himself
16 drove in?

17 A. Mr Taylor had a Nissan Patrol that he was using.

18 Q. A Nissan Patrol. Was there anything special about his
19 Nissan Patrol?

11:12:24 20 A. What do you mean by special? I want you to be specific,
21 please.

22 Q. I will try. Was there a particular specification to the
23 Nissan Patrol that Mr Taylor used, or was it just the ordinary
24 one that you could buy from any old dealer?

11:12:50 25 A. Well the van never had any special thing on it to say that
26 there was something very special on it, but it was a jeep.

27 Q. Yes. You say it was a --

28 A. It was nice.

29 Q. -- a Nissan jeep?

1 A. I want to tell you that Mr Taylor was not just riding on a
2 single vehicle at a point in time to say that at all times he
3 used a particular vehicle. He was a man very conscious of his
4 security, so most often he will change the vehicle that he would
11:13:49 5 use. Sometimes he did not even use his own vehicle. He would
6 use another vehicle whilst he was patrolling, so that was how it
7 happened.

8 Q. Mr Taylor was in - used a bullet proof jeep, didn't he? Or
9 do you not know anything about that?

11:14:19 10 A. From the start when I was with Mr Taylor he did not have a
11 bullet proof vehicle, because the vehicles that we were using
12 were looted vehicles from people and those were the ones he was
13 using. Maybe it was later that he had his bullet proof.

14 Q. And it was a Mercedes Benz jeep, not a Nissan Patrol?

11:14:54 15 A. My Lord, I am telling you that at the time I was with
16 Mr Taylor he was using a Nissan Patrol jeep, so if you are
17 talking about a Mercedes Benz, a bullet proof, then I will tell
18 you that at that time I was not with him when he had the bullet
19 proof, but at the time I was with him he was using a Nissan
11:15:22 20 Patrol.

21 Q. Well, I am suggesting to you that he was using a bullet
22 proof Mercedes jeep at the period of time that you have been
23 describing and that you were not with him. Do you follow? You
24 were not with him as part of his Executive Mansion Guard in 1990,
11:15:43 25 or any other time. Can you explain why it was that you
26 understand --

27 PRESIDING JUDGE: I didn't get an answer to the last
28 question, Mr Munyard.

29 MR MUNYARD: I am sorry.

1 PRESIDING JUDGE: Did you hear the question, Mr Witness?

2 THE INTERPRETER: My Lord, I was asking counsel to go over
3 that question.

4 MR MUNYARD: Ah, I am sorry. I didn't hear that.

11:16:10 5 PRESIDING JUDGE: No, we didn't hear that either,
6 Mr Munyard. If you can repeat the question, please.

7 MR MUNYARD:

8 Q. Mr Mongor, I am suggesting you didn't see his bullet proof
9 Mercedes jeep in 1990 because you were not with him in 1990, or
11:16:25 10 1991. Do you understand?

11 A. I want you to repeat.

12 Q. You were not with him in 1990 or 1991 and that is why you
13 didn't see his Mercedes bullet proof jeep, yes or no?

14 A. Those are two questions. You are talking about 1990 and
11:16:55 15 1991, so I want you to select one from the two and then tell me
16 which one you are actually talking about, whether it is the 1990
17 or the 1991, then I will be able to answer to your question.

18 Q. You have told us that you never saw him in a bullet proof
19 Mercedes jeep. You also told us in March that you were part of
11:17:25 20 his Executive Mansion Guard between 1990 and 1991 and that is why
21 I am making it absolutely clear to you that I suggest that he had
22 such a jeep during that period of time and, if you never saw it,
23 that means that you were not with him during that particular
24 period?

11:17:55 25 A. My Lord, I want to tell you that I did not even tell you
26 that I was with Mr Taylor in 1991 at the Executive Ground and as
27 you are talking about 1991 I was not there, but the 1990 that you
28 are talking about I did not see him with any Mercedes Benz that
29 was bullet proof and I still tell you that he had a Nissan

1 Patrol. Maybe if it was in 1991 that he had his Mercedes Benz
2 bullet proof I was not with him and I don't even know about it.

3 Q. Did Mr Taylor give you any reason why he would select you
4 of all people to go and help Foday Sankoh train the RUF?

11:19:00 5 A. No, he did not give me any particular reason to say this is
6 the reason for which you do this, but maybe he did it because of
7 the way I was active, or because of the way I performed my
8 duties. Maybe it was based on that that he selected me to go and
9 train those people.

11:19:34 10 Q. Were there also Special Forces who went with you to train
11 the RUF?

12 A. No.

13 Q. Were there Special Forces available at Gbarnga who could
14 have gone with you to train the RUF, but you were selected
11:19:59 15 instead?

16 A. Yes, I was selected and there was a reason.

17 Q. What was the reason, Mr Mongor?

18 A. At first Mr Taylor used to disguise for people not to know
19 about the RUF, so he was not in a position to send Special Forces
11:20:35 20 members to go and train the people and he would not want people
21 to know that he was preparing people to go and fight in Sierra
22 Leone because he had said over the BBC that Sierra Leone will
23 feel the bitterness of war. He had gone over the air and said
24 that and he would not want people to know that he was preparing
11:21:05 25 people to go and fight there. So all of those things he was
26 doing, he was doing them in disguise.

27 Q. Let me ask you about that, please. When did Mr Taylor say
28 that Sierra Leone will feel the bitterness of war?

29 A. Well, it was in the same 1990 when the Alpha Jets fled from

1 Sierra Leone and went and bombarded Liberia, so at that time he
2 even said that we should arrest all Nigerians and Sierra Leoneans
3 who were in Liberia at that time.

11:21:56 4 Q. When in 1990 did he say Sierra Leone will taste the
5 bitterness of war?

6 A. Well, I can't give you a specific date as at now, but
7 I said it was in that year that he said it over the BBC. When he
8 said that Sierra Leone will feel the bitterness of war, I said it
9 was in that year that he said it and he even passed an order that
11:22:22 10 Sierra Leoneans and Nigerians should be arrested.

11 Q. He did say Nigerians, yes, okay. That is what you are
12 saying, but can you tell us what part of 1990 Mr Taylor said this
13 over the BBC, beginning, middle, or end?

14 A. I will tell you that it was mid-1990 that he said that.

11:22:56 15 Q. Right, so around June, something like that?

16 A. I don't want to be specific to give you a specific one.
17 I have told you that. If I tell you - give you a specific month
18 and say it is so and so month, in that case I am trying to
19 complicate issues for myself, but I am saying that it was in that
11:23:25 20 year and it was mid that year that he said it.

21 Q. So on your account he selects you in March of 1990 to go
22 and train the RUF, but because some months later he says over the
23 BBC that Sierra Leone will taste the bitterness of war, he then
24 decides that people shouldn't know that he is sending people to
11:23:51 25 train the RUF. Is that what you are saying?

26 A. I want you to repeat that. Let me get it clearly.

27 Q. You are saying that he said Sierra Leone will feel the
28 bitterness of war and that is why - because he had said that,
29 that is why he disguised the fact that he was sending people to

1 train the RUF. That is what you said earlier, isn't it?

2 A. You asked me, "Why did he leave his Special Forces and
3 select you?" In my reply I said that he was disguising. He
4 never wanted people to know.

11:24:52 5 Q. Mr Mongor, let me put your reply to you from the
6 transcript, page 47, starting at line 19, and this is what you
7 said to us just moments ago, "At first Mr Taylor used to disguise
8 for people not to know about the RUF, so he was not in a position
9 to send Special Forces members to go and train the people and he
10 would not want people to know that he was preparing people to go
11 and fight in Sierra Leone because he had said over the BBC that
12 Sierra Leone will feel the bitterness of war." So it was because
13 he said that that he was then disguising the fact that he was
14 sending people, on your account, but I want you to explain this:

11:25:15 10
11
12
13
14
11:25:45 15 He had already sent you months before he says over the BBC about
16 Sierra Leone tasting the bitterness of war, so how is it that
17 because he said that he was disguising the fact that he was
18 sending people to help train the RUF if he has not even said it
19 at the time that he sends you?

11:26:23 20 A. I don't want you to tell me that he said it when I was not
21 there, but even when he ordered and those people were arrested,
22 I was there when the arrest of the Sierra Leoneans and other
23 people went on and even before we went on the issue of the
24 training.

11:27:06 25 Q. Mr Mongor, I don't know if you have misunderstood the
26 question, but I have asked you to explain your earlier answer
27 that Mr Taylor didn't send Special Forces because he wanted to
28 disguise the fact that he was sending people to work against
29 Sierra Leone, because he had said over the BBC about Sierra Leone

1 tasting the bitterness of war, when in fact he had not even
2 uttered those words at the time that you claim he selected you to
3 go to work with the RUF. Do you see what I am saying? I am
4 suggesting that what you are saying doesn't make sense. Do you
11:27:56 5 agree?

6 A. No, I don't agree with you at all and I am trying to tell
7 you that Mr Taylor said those words and he already had somebody
8 with him that he had prepared to go and head the group and he was
9 with him. So, to train the people that we assembled for that
11:28:36 10 mission, he had already said those words and we had gone on
11 arresting people who were in jail already even before the
12 mission.

13 PRESIDING JUDGE: Sorry, Mr Munyard, I am afraid - yes,
14 I think the tape has actually run out, so I am afraid I have to
11:28:58 15 interrupt you at this point because of the mechanics
16 unfortunately.

17 MR MUNYARD: Very well.

18 PRESIDING JUDGE: Mr Witness, we are now going to take the
19 mid-morning break and we will resume court at 12 o'clock. Please
11:29:10 20 adjourn court.

21 [Break taken at 11.30 a.m.]

22 [Upon resuming at 12.00 p.m.]

23 PRESIDING JUDGE: Mr Munyard, you had actually started a
24 question when - but I interrupted you from completing it.

11:59:56 25 MR MUNYARD: Thank you, your Honour, yes. I can finish
26 this point quite briefly, I think.

27 THE INTERPRETER: Your Honour, counsel's mic is not on.

28 MR MUNYARD: Thank you:

29 Q. Mr Mongor, Mr Taylor's broadcast on the BBC about Sierra

1 Leone tasting the bitterness of war was made in November of 1990,
2 the end of that year, not the middle, so you're just using that
3 as an excuse for why you say you were selected over everybody
4 else to go and help train the RUF, aren't you?

12:00:43 5 A. I disagree with you, my Lord.

6 Q. Well, I just want to tidy up a couple of matters that I
7 dealt with --

8 PRESIDING JUDGE: Just a minute. Mr Witness, which part do
9 you disagree with, the fact that the broadcast was in November
10 1990, or the fact that you were selected over everyone else to
11 help train and you're using the broadcast as an excuse?

12 THE WITNESS: Well, it was the broadcast that he said it
13 was in November, that is what I disagree with.

14 PRESIDING JUDGE: Thank you.

12:01:25 15 MR MUNYARD: Now before I move on in time can I just tidy
16 up a couple of matters that I touched on earlier this morning.
17 The first matter, Madam President, is that I do have a map, a
18 quite detailed map, now available, in colour as it happens, of
19 the part of Nimba County that I was asking the witness about
12:01:58 20 initially this morning. I hope there's enough copies for
21 everyone. I've kept one back. If that's needed I can look at it
22 on my computer screen:

23 Q. Now, Mr Mongor, I'd like you to look, please, at this map.
24 It is a map of the north eastern part of Nimba County where Nimba
12:03:30 25 County borders with Cote d'Ivoire. Do you see in the middle of
26 the page on the right-hand side there is a blue dot next to the
27 town of Gborplay, Gborplay spelt G-B-O-R-P-L-A-Y on this map? Do
28 you see that?

29 A. I have not yet seen it clearly.

1 Q. It will be easier for you if you look at the paper document
2 in front of you and if you just look over here I will point out
3 where it is on the map. Hello?

4 PRESIDING JUDGE: Mr Witness, counsel is indicating for you
12:04:13 5 to assist you to find it.

6 MR MUNYARD:

7 Q. Middle right-hand side, right on the border of La Cote
8 d'Ivoire. Do you see Gborplay there?

9 A. Yes.

12:04:32 10 Q. You do, thank you. If you go up with your finger along the
11 border the next town you come to is Loguatu. Now, I think you
12 might pronounce that - you and other people might pronounce that
13 slightly differently, but that is the border town that we were
14 talking about where the road goes in from Liberia into La Cote
12:04:59 15 d'Ivoire, isn't it? Do you agree that's the border town we were
16 talking about earlier?

17 PRESIDING JUDGE: Mr Munyard, can I take it that the yellow
18 line is a road?

19 MR MUNYARD: It is, your Honour, yes. I believe that this
12:05:19 20 is a United Nations map and the numbers on it and the dots are
21 actually references to United Nations installations of one sort
22 or another, but the yellow is certainly a road:

23 Q. Now, you told us this morning that you were captured
24 somewhere between Gborplay and Loguatu. Do you remember saying
12:05:45 25 that?

26 A. Yes, I recall that I said that.

27 Q. Go back, please, to Gborplay on the map and move your
28 finger down the map this time and do you see, still very close to
29 the border, the town of Butuuu? Do you see that? Madam Court

1 Officer will point it out to you if you can't see it.

2 A. I see it.

3 Q. And using this map I just want to suggest to you that the
4 area between Gborplay and Loguatu was not captured by the NPFL
12:06:48 5 until some months after they first invaded through Butuuu. What
6 do you say about that: That the area where you say you were
7 captured before Christmas 1989 was not in NPFL hands until some
8 months into 1990 I'm suggesting? You can laugh, but we would
9 like an answer from you, please.

12:07:30 10 A. I laughed because you said that it was 1990. That was why
11 I laughed, because in 1990 that was now at the rear of the NPFL.
12 There was no fighting in that area. That was why I laughed when
13 you said 1990. It doesn't mean that I was laughing because of
14 the question that you asked, but it was because you said it was
12:08:02 15 in 1990 that NPFL captured that area. I disagree with that, my
16 Lord. I want to say it did not happen that way.

17 JUDGE SEBUTINDE: Mr Interpreter, what do you mean that was
18 at the rear of the NPFL? What do you mean? "Because in 1990
19 that was now at the rear of the NPFL", what do you mean?

12:08:26 20 THE INTERPRETER: Your Honours, I said exactly what the -
21 the reason why I said it was the rear - your Honours, like I
22 said, I interpreted what the witness said and by the rear he's
23 saying the NPFL had already passed that area, at the back of the
24 NPFL.

12:08:51 25 JUDGE SEBUTINDE: You mean after.

26 MR MUNYARD:

27 Q. I want to make it clear to you that what I suggest happened
28 in the civil war in Liberia is that after Gborplay the NPFL moved
29 south to Tapeta. I should tell everybody Tapeta is not on this

1 section of the map, but I can describe the direction. If you go
2 to the bottom of the map, Mr Mongor, if you can stop laughing for
3 just a moment and go to the bottom of the map, do you see on the
4 left-hand side there's a town called Zuatuo. Do you see Zuatuo?

12:10:00 5 Do you see Zuatuo?

6 PRESIDING JUDGE: Have you found it, Mr Witness, otherwise
7 we will assist you?

8 MR MUNYARD:

9 Q. We'll help you.

12:10:09 10 A. Zuatuo, yeah.

11 Q. And Tapeta is to the south, some distance south of Zuatuo,
12 and that was where the NPFL went next and then some time after
13 that further south to Buchanan. The towns I'm now naming are not
14 on this map. I just want to put it absolutely specifically to

12:10:47 15 the witness to make it clear what I was putting earlier. If you
16 put the map on one side, Mr Mongor, and just listen to the
17 question: That after Tapeta they went to Buchanan, do you agree
18 with that?

19 A. My Lord, I did not disagree with the fact that the NPFL
12:11:17 20 never went to Buchanan, but I am saying that the particular group

21 that we went to fight with did not go to Buchanan. We fought in
22 Ganta before we went to Gbarnga. I had said before this Court
23 that the NPFL was divided into groups. There were groups that
24 went towards the Tapeta area and the group that went towards the

12:11:44 25 Tapeta area were the groups that were up to Buchanan. I don't
26 disagree with that fact, and there was a group that moved - that
27 came to Ganta and from there went to Gbarnga. So, that was how
28 it was happening, but it was not a single group that moved to go
29 and capture Tapeta and then later came to Ganta to capture there

1 and then later moved to go to Buchanan. That was not how it
2 happened. That was not how it happened at all.

12:12:29 3 Q. Mr Mongor, Mr Taylor went from Tapeta to Buchanan. He was
4 not in Ganta or Gbarnga at all in 1990, I'm suggesting. He was
5 in Buchanan in 1990. Do you agree or disagree?

6 A. I disagree.

7 Q. From there he went to Harbel and was there some time and
8 from Harbel, only when Gbarnga was safe and secure did he go to
9 Gbarnga some time in late 1991 by which time you were fighting -
12:13:12 10 you were either training RUF soldiers, or you were fighting in
11 Sierra Leone. He did not go to Gbarnga before you left to train
12 the RUF soldiers and then fight in Sierra Leone. Do you
13 understand that's what I'm suggesting?

14 A. I don't agree with your suggestion at all.

12:13:41 15 Q. That's all I want to do on geography. One last question:
16 You say you fought in Bong Mines, who was the commander in Bong
17 Mines?

18 A. I told you that it was one Special Forces member who was
19 called Prince Quiwonkpa.

12:14:01 20 Q. Who was the commander in Kakata?

21 A. Kakata, it was we and Pa Zobia who went to Kakata before
22 Prince Quiwonkpa took the other group that went to Gbarnga and
23 later Bong Mines. There was Francis Mewon who was also there.

24 MR MUNYARD: Your Honour, would you give me just a moment.
12:14:40 25 There might be one matter that I need to --

26 PRESIDING JUDGE: Perhaps if we could get some spellings of
27 some names maybe from the witness.

28 MR MUNYARD: Probably not from me.

29 PRESIDING JUDGE: Very well. Mr Witness, are you able to

1 spell any of the names you've mentioned: Prince Quiwonkpa, the
2 person who was commander at Kakata, Pa - how did you pronounce it
3 again, please, Zobia. Can you spell that name? We will have to
4 record it phonetically then.

12:15:22 5 THE WITNESS: I cannot spell. I cannot spell it.

6 MR MUNYARD: Is that it, yes?

7 PRESIDING JUDGE: Please proceed.

8 MR MUNYARD:

9 Q. There is one matter that I do want to correct. I said to
12:15:46 10 you that Cassius Jacobs wasn't commander of the Executive Mansion
11 Guard until 1994. I got that wrong. 1993. But of course you
12 were well out of Liberia in 1993, weren't you?

13 A. 1993, no, I was not in Liberia at that time.

14 Q. Now, back to where we broke off, you were explaining how
12:16:22 15 you were chosen to go to train the RUF because Mr Taylor didn't
16 want Special Forces training them. In fact, there was a man
17 called Gonkarnue, or a name similar to that, who was amongst
18 the --

19 THE INTERPRETER: Your Honour, could counsel please go over
12:16:45 20 that name.

21 MR MUNYARD: I will try to:

22 Q. It's a name like Gonkarnue. Does that name sound familiar
23 to you, Mr Mongor?

24 A. What did you say is the name?

12:17:06 25 Q. A name like Gonkarnue, or Gonkarnue.

26 A. Yes, I know that name.

27 Q. I know there are usually different ways of pronouncing the
28 same name, but you know a person by the name of Gonkarnue and he
29 was a member of --

1 A. Yes.

2 Q. -- Special Forces who was training the RUF in Camp Naama,
3 wasn't he?

4 A. The man was not a Special Forces.

12:18:06 5 Q. How do you know?

6 A. Because I have been together with him.

7 Q. Who were Special Forces?

8 A. Those who were known to be the Special Forces were those
9 who trained in Burkina Faso and Libya. Those were the Special
10 Forces. They were the ones who entered and brought the war.

11 Q. What about Gio Devil, do you know him?

12 A. What devil?

13 Q. G-I-O Devil.

14 MR KOUMJIAN: Perhaps the pronunciation is Gio, as in the
15 tribe.

16 MR MUNYARD: It may well be. I'm grateful to Mr Koumjian:

17 Q. Gio Devil?

18 A. Gio devil, I know that name.

19 Q. And he was a member of Special Forces, wasn't he, who was
12:19:32 20 training the RUF at Camp Naama?

21 A. Gio Devil never trained RUF at Camp Naama.

22 Q. Now let us move then to your involvement with the RUF and
23 Foday Sankoh. You were introduced to Foday Sankoh by your friend
24 John Kargbo, weren't you?

12:20:07 25 A. Well, I knew Foday Sankoh to be one of the Special Forces
26 who were present on the Executive Ground, but I also later knew
27 him through John Kargbo and he was one of my friends and he was
28 Foday Sankoh's tribesman.

29 Q. Mr Mongor, it was John Kargbo who introduced you to Foday

1 Sankoh, wasn't it?

2 A. I said I knew him before. Even before he showed me to
3 Foday Sankoh, to be somebody close to him, I had known Foday
4 Sankoh.

12:21:11 5 Q. And which Mansion Ground is this that you say that you knew
6 Foday Sankoh from?

7 A. I knew Foday Sankoh from Gbarnga on the Executive Ground.
8 That was where I came to know him and I used to see him go to the
9 front line together with Mr Taylor, but at that time I never knew

12:21:42 10 his name Foday Sankoh because that was not how we used to call
11 him.

12 Q. And how did you call him?

13 A. We used to call him Pa Morlai, that was his name that we
14 knew.

12:21:58 15 Q. You told us in March that Foday Sankoh had a special
16 relationship - those are my words, not yours - a special
17 relationship with Mr Taylor because Mr Taylor had fought to get
18 Foday Sankoh out of prison in Ghana. Do you remember saying
19 that?

12:22:23 20 A. Yes, I said that.

21 Q. When is it that you say that Foday Sankoh was in prison in
22 Ghana?

23 A. I did not get that clearly. I want you to repeat it.

24 Q. When is it that you say that Foday Sankoh was in prison in
12:22:56 25 Ghana?

26 A. Well, Foday Sankoh did not give me a particular date, but
27 he did say before they went to Libya to train he had a problem
28 and he was in jail. So, he said it was his brother Mr Taylor who
29 fought to secure his release when they went to Libya to go and

1 train. That was what he told me.

2 Q. And when was it that Foday Sankoh told you all of this?

3 A. Foday Sankoh told me at the time we were on the training
4 base in Camp Naama.

12:23:43 5 Q. Just help us with Camp Naama. Were there two training
6 bases there: One for RUF and one for NPFL?

7 A. Yes.

8 Q. Two separate training bases?

9 A. Yes.

12:24:00 10 Q. For two separate organisations?

11 A. Yes.

12 Q. And is this right: That most of the people that you
13 trained in the RUF training base were Sierra Leoneans?

14 A. Yes, they were Sierra Leoneans.

12:24:22 15 Q. 90 per cent of them Sierra Leoneans?

16 A. What did you say?

17 Q. 90 per cent of them were Sierra Leoneans, the people you
18 trained in Camp Naama?

19 A. Yes.

12:24:41 20 Q. All right. You were recruited by Foday Sankoh, weren't
21 you, to go and train RUF fighters in Camp Naama?

22 A. It was not Foday Sankoh who recruited me.

23 Q. Who do you say recruited you?

24 A. I have said it was Mr Taylor who sent me to go with Foday
12:25:26 25 Sankoh in order to help train his men.

26 Q. Well, have you ever told anyone that it was Foday Sankoh
27 who recruited you?

28 A. Well, I have not told anybody that it was Foday Sankoh who
29 recruited me.

1 Q. All right. What were you claiming to be at the time that
2 you went to work at Camp Naama? Were you claiming to be
3 Liberian, or were you claiming to be Sierra Leonean?

4 A. Well, I was a Sierra Leonean. I told people that I was
12:26:10 5 born in Sierra Leone, but it was in Liberia that I grew up and I
6 was not in Sierra Leone all those years.

7 Q. What I was asking you was what - when you went to work with
8 the RUF in the training camp were you saying that you were
9 Liberian, or Sierra Leonean?

12:26:36 10 A. Well, I was a Sierra Leonean.

11 Q. And that's why you were with the RUF, isn't it, because you
12 were saying that you were Sierra Leonean?

13 A. No, that was not the reason why I was with the RUF, but it
14 was a mission given to me. So I went there to accomplish the
12:27:01 15 mission, but it doesn't mean that it was because I was a Sierra
16 Leonean that was why I went there, no.

17 Q. Your friend who introduced you to Foday Sankoh was a Sierra
18 Leonean, wasn't he?

19 A. Yes, he was a Sierra Leonean.

12:27:18 20 Q. And Foday Sankoh was a Sierra Leonean?

21 A. Yes, Sankoh was a Sierra Leonean.

22 Q. And what was the mission that you were on with the RUF?

23 A. I went to train the RUF recruits on the Camp Naama base.

24 Q. Yes, what was the mission? What was the purpose of it?

12:27:57 25 A. The purpose was for them to go and fight in Sierra Leone.
26 To go and fight in Sierra Leone.

27 Q. Yes, but why were they going to fight in Sierra Leone?

28 A. They were going to fight to change the system that had been
29 in their country, because at that time they had a one party

1 system in the country.

2 Q. And why did you agree to do all of this?

3 A. Like I told you, I did it because it was a mission given to
4 me that I should go and train them and it was a mission that I

12:29:01 5 was to accomplish. So, I went and did it.

6 Q. And did you believe in what the RUF were trying to do when
7 you started training them in 1990?

8 A. What?

9 Q. You told us they were going to fight to change the system

12:29:23 10 that had been in their country because at that time they had a

11 one party system. Did you believe in their objective of changing
12 that system?

13 A. Yes, I believed in it.

14 Q. Now I'm just going to ask you to look at some documents,

12:29:51 15 please, which I have temporarily misplaced. (Would your Honour
16 give me just a moment while I track them down? Ah, it may be
17 that they've already very efficiently been distributed. Thank
18 you.)

19 PRESIDING JUDGE: Has counsel for the Prosecution seen the
12:30:37 20 bundle?

21 MR MUNYARD: Well, I hope so, because I haven't - we
22 brought them in this morning and I thought they were still here
23 on our desk, but they've obviously been distributed:

24 Q. Now, Mr Mongor, I'd like you to have a look first of all at

12:30:53 25 the first tab. No, sorry. I am sorry, mine are organised in

26 date order and these are organised in tabs and it would appear

27 that there is something missing, but I can move on. Could you

28 have a look, please, at tab number 12? Do you have tab 12 in

29 front of you? Can I confirm that everybody's got that and can I

1 draw attention to the fact that there's an apparent discrepancy
2 on the face of the record. If you look in the first box where it
3 gives the witness's details it gives the witness's name as
4 "Mongor", the investigators present as "Umaru KAMARA", attorney
12:33:19 5 present "Nicholas KOUMJIAN" and then it gives the date "25-26th
6 August 2007" in the interview room at Freetown, but if you look
7 at the very first line of the text it says:

8 "Interview notes obtained by Umaru KAMARA during prepping
9 of Isaac Mongor on 25-26 July 2007 commencing at 11:30 hours".

12:33:50 10 I think I am right in saying that it is July and I see
11 Mr Koumjian, who has the advantage over me of having been
12 present, agreeing that it is in fact July.

13 Now, Mr Mongor, I just want to ask you a little bit about
14 this because I'm really dealing with your connection with the RUF
12:34:13 15 now, but can you just help us by looking at the second numbered
16 paragraph on that first page, page 38999, where it says:

17 "On or about 1983, [you] joined the Armed Forces of Liberia
18 ... that was during the regime of President Doe."

19 Do you see that? Is that right, 1983?

12:34:52 20 A. No, my Lord.

21 Q. Well, did you tell Mr Koumjian and the investigators that
22 it was about 1983 when you joined the Armed Forces of Liberia, or
23 have the investigators got it wrong?

24 A. Maybe it was a problem of language barrier, or maybe the
12:35:23 25 way I talk. That was probably how the mistake might have come
26 about, but I did say 1985.

27 Q. I see. Well, you will recall yesterday that I went to some
28 trouble to establish first of all that these interviews were read
29 back to you so that you could correct anything that was wrong.

1 Do you remember that?

2 A. Yes, I recall when you said that yesterday. I recall.

3 Q. And if this interview was read back to you, as you
4 suggested yesterday, why didn't you correct them when they read
12:36:17 5 back the words, "On or about 1983, he joined the Armed Forces of
6 Liberia"?

7 A. Maybe I was not attentive enough to have made that
8 correction, but I don't think that was how it happened.

9 Q. So do you think they got it wrong, or you did?

12:37:03 10 A. Well, maybe the mistake must have come from the person who
11 wrote it.

12 Q. Right. And then you followed that mistake up by not
13 correcting it when it was read back to you, is that what you're
14 saying?

12:37:24 15 A. Well, I have said that maybe I was not attentive enough
16 when they were reading that area to me.

17 Q. All right. Now, look below there. Paragraph 3 describes
18 your training at Camp Todee, but you escaped from the training
19 camp and went back to Buchanan, and then it says you were selling
12:37:56 20 clothing between Ivory Coast, Liberia and Koindu in Sierra Leone.
21 So you were working not just in Liberia but also in Sierra Leone
22 then, weren't you?

23 A. Yes, I used to come over to Sierra Leone to sell.

24 Q. Yes. And then paragraph 4 reads as follows:

12:38:21 25 "During the early stage of the war in Liberia, he became
26 associated with the NPFL".

27 Do you see that?

28 A. Yes, I can see number 4 that you are talking about.

29 Q. What does that mean? Became associated with does not mean

1 was captured by, does it?

2 A. No.

3 Q. So what were you trying to convey there, Mr Mongor?

4 A. Well I was trying to explain that because at that time I
12:39:23 5 was a businessman I was selling, but for me to be part of the
6 NPFL was what I was trying to explain to the people.

7 Q. Were you captured by them, or did you simply become
8 associated with them? That's what this Court will want to know.

9 A. Once I had been captured it means I was already part of
12:39:58 10 those people, because they had captured me and they took me along
11 with them and then I was now with them and so I was considered
12 part of them. That was what I was trying to explain and that is
13 what I am trying to tell the Court. That as long as the people
14 had captured me, they had taken me to their base, they had
12:40:19 15 started training me, it means that I was now part of them because
16 I was now in their hands in their camp.

17 Q. Mr Mongor, this interview on 25 to 26 July 2007 is the 16th
18 day on which you had been interviewed by the Office of the
19 Prosecution, in other words you'd been interviewed on 15 previous
12:40:51 20 days going back to 30 August 2006, and this particular interview
21 is said to be in line 3 of the text:

22 "The witness made the following clarifications/corrections
23 with regard to his previous interviews".

24 So, you're clarifying previous interviews. Now, I accept
12:41:21 25 that in the very first interview, and we'll look at that in a
26 moment, you said that you were captured by the NPFL, but I want
27 to know what the clarification is that you were giving in
28 interview in July of 2007 when it says during the early stage of
29 the war in Liberia you became associated with the NPFL, because

1 that certainly doesn't suggest that you were captured by them,
2 does it?

3 A. I want to tell you, Mr Lawyer, that as you are talking
4 about what the paper is saying here about associate, they had
12:42:13 5 already captured me. I was with the people, so I had considered
6 myself to be part of them and I had already become a member of
7 the organisation. That is what I am trying to tell you and that
8 is what I'm trying to tell the Court.

9 Q. Look at the next sentence, please, "He first met FS,"
12:42:37 10 meaning Foday Sankoh, "in 1990 through a friend, John Kargbo,"
11 spelt K-A-R-G-B-O, "who was an SSD police (SLP)." Now, SLP means
12 Sierra Leonean police force presumably, is that right?

13 A. Yes.

14 Q. So you met Mr Sankoh first through your friend, John
12:43:06 15 Kargbo, who was a Sierra Leonean police officer?

16 A. Yes, but I want to make something clear in the paragraph
17 that you are reading, where I said "first".

18 Q. Yes?

19 A. When I said first that I had known Mr Foday Sankoh, but
12:43:55 20 that was not to suggest that I had ever gone close to him for the
21 two of us to discuss. That never happened. But it was this of
22 my friend that was the first person to create the avenue wherein
23 I would sit and discuss with Foday Sankoh. But to say I never
24 knew him, that is not the case. I knew him before that.

12:44:28 25 Q. Had you ever spoken to him before?

26 A. Talking to him was like sometimes just when I saw him I
27 greeted him and when I met with him I gave him compliments,
28 because he was one of the bosses. But to say that I really sat
29 with him and discussed with him was when John Kargbo introduced

1 me to him, because he was his tribesman, and that was the first
2 time that he introduced me to him.

3 Q. It was John Kargbo who got Foday Sankoh interested in you,
4 wasn't it, not Charles Taylor?

12:45:20 5 A. No, it was not John Kargbo that made him get interested in
6 me.

7 Q. Can we go back, please, to tab 1. This is the first
8 interview on 30 August 2006 and I'm looking at the first page,
9 page 23018. You'll see this is an interview with you in a prep

12:46:04 10 room in Freetown. Investigators present: KR Kolot and
11 translator Mohamed Keifala. Then it says notes of KC Kolot of
12 interview with you of 1340 hours on that date and it starts off,
13 "Kolot went over witness data sheet and Charles Taylor indictment
14 with Mongor." So were you taken through the list of charges

12:46:40 15 against Mr Taylor before you were asked any questions about your
16 connection with him?

17 A. To say they read it out to me, is that what you are trying
18 to say?

19 Q. I am asking you. It says here that the investigator went
12:47:07 20 over the Charles Taylor indictment with you, so he told you, did
21 he, what the specific charges and allegations against Mr Taylor
22 were before he started asking you any questions about your
23 involvement with Mr Taylor. Is that right?

24 A. Well, he showed me and he told me the charges against
12:47:50 25 Mr Taylor and it was at that time that he asked me what was my
26 relationship when I was with the NPFL.

27 Q. You knew by the time of that first interview that the
28 Office of the Prosecution were very interested in talking to you
29 because they had contacted you the previous year when you came

1 out of prison and then they contacted you again through Lawrence
2 Womandia, that led to this interview. So you knew they were very
3 interested in your knowledge of Charles Taylor, didn't you?

12:49:00 4 A. Yes, the Court had interest because they knew that I was
5 with Mr Taylor and they knew that I knew how the war started and
6 how it even entered Sierra Leone.

7 Q. Pause there if you would for a moment. I'm not trying to
8 stop the flow, but I want to ask you about something you've just
9 said. You say the Court "knew that I was with Mr Taylor". Did
12:49:30 10 they tell you that before they interviewed you?

11 A. Yes, they told me that they had heard information that I
12 was with Mr Taylor.

13 Q. Right, and you knew because you'd had a year to think about
14 it, or the better part of a year to think about it, that they
12:50:00 15 were interested in getting information from you about
16 Charles Taylor, didn't you?

17 A. I cannot think for a year. Like I have told you, I said I
18 had so many other problems that I was trying to settle. I was
19 trying to put myself together. That was what I told you.

12:50:32 20 Q. You knew by the time of this interview that they wanted you
21 to tell them everything that you possibly knew about
22 Charles Taylor, didn't you?

23 A. Yes, they wanted me to tell them everything I knew about
24 Mr Taylor.

12:50:55 25 Q. And they told you, as you've just admitted, that they
26 believed that you had been with Mr Taylor?

27 A. Yes, they believed, based on the information that they got.

28 Q. Did they tell you where they'd got that information from?

29 A. No, no.

1 Q. Mr Mongor, were you at any time, during any of these
2 interviews on 24 separate dates, shown the witness statement of
3 anybody else in this case?

4 A. No, never. They have never brought any witness's statement
12:51:55 5 before me.

6 Q. Is that an honest answer?

7 A. Yes, not a day that they have ever brought a witness's
8 statement before me to read it out to me to say this witness's
9 statement is this, or that is this witness's statement. That is
12:52:18 10 what I'm saying and I'm telling you the truth.

11 Q. All right. Now, it says here, I'm going back to page
12 23018, "Mongor joined the NPFL in 1989 at the start of the
13 revolution." I'm missing out irrelevant words. Then it goes on
14 to say, "Captured by NPFL in early part of 1989 in Nimba County
12:52:55 15 while operating business." Well, first of all did you join them,
16 or were you captured by them?

17 A. They captured me and when you say "join" it means it is
18 something that you are willing to do, but it was not something I
19 was willing to do and it was not something that I saw and I was
12:53:25 20 willing to join, no.

21 Q. Well, this statement - this interview, sorry, there are no
22 statements, in this interview you had the benefit of an
23 interpreter, a translator, Mohamed Keifala. That's right, isn't
24 it?

12:53:54 25 A. Yes.

26 Q. If we take this interview and the earlier one we looked at
27 together, we've now got three different expressions: "Joined",
28 "captured" and "became associated with". It's all rather
29 ambiguous, is it not? If you want me to explain what I mean by

1 that word I will.

2 A. Yes, I want you to explain.

3 Q. These words do not necessarily convey the impression that
4 you became involved with the NPFL against your will, do they?

12:54:39 5 "Joined" and "became associated with" are a long way from
6 "captured", aren't they?

7 JUDGE SEBUTINDE: Mr Munyard, where is the reference to
8 "joined"?

9 MR MUNYARD: It's the second bullet point, your Honour.

12:54:59 10 It's what I just read out, "Mongor joined the NPFL in 1989 at the
11 start of the revolution":

12 Q. Did you join the NPFL, or did you go straight to the RUF
13 training camp, having been introduced to Foday Sankoh by your
14 friend John Kargbo?

12:55:34 15 A. I was with the NPFL.

16 PRESIDING JUDGE: Mr Munyard, I don't recall an answer to
17 the previous question that you were asked to clarify.

18 MR MUNYARD: Your Honour is quite right. I'll ask it
19 again:

12:55:52 20 Q. The words joined and became associated with are a long way
21 from the meaning of captured, aren't they?

22 A. Captured, that is the first one, and later I became member
23 - I became a member and I was part of them, but when you say join
24 it means I was with them. That is how I understand it. Maybe
12:56:45 25 you have a different interpretation for that, but I know that I
26 was captured before I was trained and after that I became member
27 and I was part of the NPFL. So, I was also one of the NPFL men
28 at that time.

29 Q. Well, let's deal with the bit where it starts with the word

1 captured, "... captured by NPFL in early part of 1989 in Nimba
2 County ..." Were you captured "in early part of 1989"?

3 A. Yes, I was captured.

4 Q. "... in early part of 1989"?

12:57:42 5 A. It was not the early part. I said it was in December.

6 Q. So did you tell Mr Kolot, through the translator, that it
7 was December 1989, but they've managed to write down a completely
8 different phrase? Is that what you're saying?

9 A. I can say that, but I had told them that I was captured in
12:58:13 10 1989 and that was in December and Christmas was approaching.

11 Q. Right, we have your answer that you told them that it was
12 December and they've written down it was early part of 1989.
13 Look at what follows after that, please:

14 "Trained ...", it says, "... in Borphy Town ...", that's
12:58:39 15 obviously Gborplay, "... in Nimba [County], (first training base
16 for NPFL). Charles Taylor ... resided at that base with Prince
17 Johnson."

18 Did you tell them that Charles Taylor resided at Gborplay
19 base with Prince Johnson?

12:59:02 20 A. No, during my testification [sic] here I have never said
21 that Prince Johnson was at Gborplay base together with
22 Charles Taylor.

23 Q. So, what were you doing telling the investigators in August
24 of 2006 that Charles Taylor resided at the base with Prince
12:59:34 25 Johnson?

26 A. I told them about Charles Taylor, that he was at the base
27 and I saw Mr Taylor there for the first time.

28 Q. Mr Mongor, answer the question please. What were you doing
29 telling the investigators that Charles Taylor resided at the base

1 with Prince Johnson, if that's not true?

2 A. I was not doing anything, but I cannot recall telling them
3 that Prince Johnson was at that base with Mr Taylor.

4 Q. So, you're now saying you can't recall telling them that.

13:00:08 5 A moment ago you said you never said that.

6 A. No, I did not tell them that Prince Johnson was with
7 Mr Taylor at the training base together.

8 Q. So, are you saying that these people who interviewed you
9 have invented that?

13:00:28 10 A. Maybe they made a mistake. Maybe it was the person who
11 wrote it.

12 Q. They made the mistake, is that what you're saying?

13 A. Maybe, yes, I can say it was a mistake that they made, or
14 maybe the way they understood me. Maybe they misunderstood me.

13:00:55 15 Q. How could they have misunderstood something as simple as
16 "Charles Taylor ... resided at that base with Prince Johnson"?

17 A. Well, I never said that Prince Johnson was at that base.
18 Prince Johnson - I joined the NPFL and I saw Prince Johnson when
19 Mr Taylor's group was fighting against his, so I did not say
13:01:29 20 Prince Johnson was at the base with Mr Taylor together.

21 Q. So either the investigators are unreliable in recording
22 that, or you are unreliable in the account that you were giving
23 them. That's the choice, isn't it?

24 MR KOU MJIAN: That's argumentative.

13:01:48 25 MR MUNYARD: Sorry?

26 MR KOU MJIAN: My objection is it's argumentative.

27 PRESIDING JUDGE: Your reply, Mr Munyard?

28 MR MUNYARD: I don't actually understand that it's
29 argumentative:

1 Q. There is a simple choice here, isn't there, Mr Mongor, that
2 either the record made by the investigators is an unreliable
3 record because it's not what you told them, or what you told them
4 is unreliable because it's not what you maintain now? Do you
13:02:25 5 follow?

6 A. Please repeat.

7 Q. I will if you insist, but --

8 PRESIDING JUDGE: Mr Witness, it's a fairly simple
9 proposition. Either it was something you said that was wrong, or
13:02:43 10 the investigators didn't record it. Which is it?

11 THE WITNESS: Well, I am telling you that I did not say
12 that Prince Johnson and Mr Taylor were at the same base; that is
13 Gborplay.

14 MR MUNYARD:

13:03:08 15 Q. Can we move on then, please. The last two lines:

16 "Mongor first met Foday Sankoh ... [in] early 1990 in
17 Gbanga; he had no special impression of Sankoh or
18 Charles Taylor".

19 Now before we turn over the page and we look at something
13:03:35 20 else, you maintain that it's true, do you, that you first met
21 Foday Sankoh in early 1990 in Gbarnga? Is that what you're
22 saying?

23 A. Met him, what do you mean? When I saw him?

24 Q. No, I'm reading the words of your interview, "Mongor first
13:04:06 25 met Foday Sankoh ... [in] early 1990 in Gbanga". Do you still
26 say that that's true; that you met Foday Sankoh in Gbarnga in
27 early 1990?

28 A. Yes, I saw Foday Sankoh in 1990.

29 Q. And in what month?

1 A. Well I cannot tell you that it was this particular month or
2 that, but the time the Executive Ground had been established at
3 Gbarnga when Mr Taylor was there already that was when I saw
4 Mr Foday Sankoh, whom we called Pa Morlai.

13:04:58 5 Q. Well you have told us that you were at the Executive
6 Mansion Ground there in either January or February - you told us
7 that earlier today - and that is early 1990, isn't it? So, are
8 you saying it was in January or February of 1990?

9 A. Well, it could be in that second month that I'm talking
13:05:28 10 about. It could be around that time that I saw Pa Morlai in that
11 Executive Ground.

12 Q. And if you turn over the page, please, to 23019, I want you
13 to look at the second bullet point down. It starts on the fourth
14 line from the top:

13:05:56 15 "Mongor was recruited by Foday Sankoh, leader of [the] RUF,
16 to join his mission to 'change the system' in Sierra Leone".

17 Why did you tell me this morning that you were not
18 recruited by Foday Sankoh when you were telling investigators in
19 that interview that you were recruited by Foday Sankoh to join
13:06:28 20 his mission?

21 A. I want to clarify something to you, Mr Lawyer. When I
22 spoke about recruitment with regards Foday Sankoh, when I was
23 sent to go and train those people he explained to me what his
24 objectives were in fighting in Sierra Leone. It was at that time
13:07:08 25 that he explained those things to me. It was not - it was not
26 that he recruited me before I went to the base. I had had a
27 mission to train those people, so it was at the base that we had
28 this discussion together.

29 Q. Mr Mongor, we've moved on from the question of where you

1 met him to the question of who recruited you to join his mission.
2 You told me within the last hour that Foday Sankoh did not
3 recruit you to join his mission in Sierra Leone, but that
4 Charles Taylor recruited you to work with Foday Sankoh. Have you
13:07:58 5 forgotten that when you were first interviewed, when you were
6 first being asked to tell them everything you possibly could
7 about Charles Taylor and Foday Sankoh, that you said you were
8 recruited by Foday Sankoh?

9 A. No, Foday Sankoh did not recruit me. When you are talking
13:08:28 10 about recruitment it was Mr Taylor who recruited me and sent me
11 purposely for that mission to go and train those people, and
12 Foday Sankoh told me that I should join him and fight and help to
13 fight in Sierra Leone after training the men and that we should
14 help him to change the system, but I was sent to go and train
13:09:14 15 those people to prepare them for the battle. That was the
16 statement made when I was handed over to Foday Sankoh by
17 Mr Taylor.

18 Q. You started that answer by saying, "No, Foday Sankoh did
19 not recruit me". Why did you say to the interviewers in August
13:09:37 20 2006 that you were recruited by him? Just tell us why you told
21 the investigators that less than two years ago?

22 A. No, Foday Sankoh did not recruit me.

23 Q. I am going to interrupt you. I did not ask you whether or
24 not he recruited you. I asked why you told the investigators
13:10:05 25 that?

26 A. Tell them what?

27 Q. "Mongor was recruited by Foday Sankoh". Look at the page.
28 You can read.

29 A. When I spoke about recruit here I wanted to say he

1 recruited me. I meant I joined him to go and fight in Sierra
2 Leone, but I was sent to Mr Foday Sankoh and handed over to him
3 by Mr Taylor to go and train his men.

4 Q. So why didn't you tell them that?

13:11:10 5 A. Maybe I forgot, that's why I did not.

6 Q. You forgot? When they asked you, "How did you come to get
7 involved with Foday Sankoh and his RUF group?", you forgot to say
8 - just listen to the question. You forgot to say, "Oh well, it
9 was Charles Taylor who recruited me to that group." How could
10 you possibly forget such a thing if it was true?

11 A. No, what I told them --

12 Q. Just listen to the interpreter.

13 A. The interpreter has spoken already and I have listened to
14 him. They asked me, "Who sent you? How did you get connection
15 with the RUF?" I said, "It was Mr Taylor who sent me to go and
16 train these people." I was handed over to Mr Foday Sankoh to
17 help him train the men and Foday Sankoh himself told me that I
18 should join him after training the men so that we would come and
19 fight in Sierra Leone.

13:12:49 20 Q. Mr Mongor, that's a complete lie, isn't it? You did not
21 say to them, "It was Mr Taylor who sent me to go and train these
22 people." That does not appear anywhere on that page, does it?
23 Take as much time as you want to read the page?

24 A. Well, I have told you that that was what happened.

13:13:19 25 Q. Look at the page and tell us where it shows you saying to
26 them, "It was Mr Taylor who sent me to go and train these people.
27 I was handed over to Mr Foday Sankoh to help him train the men."
28 Where does it say that on this page? Look at the page and take
29 some time to read it. Don't reply yet. Look at the page and

1 read it to yourself.

2 A. I have looked at it.

3 Q. Where does it say what you have just told us you said to
4 them: "It was Mr Taylor who sent me to go and train these
13:14:02 5 people. I was handed over to Mr Foday Sankoh"? Don't look at
6 me, look at the page.

7 A. What part are you referring to? I said I have not seen it.
8 Have I seen it?

9 Q. I will deal with this one more time. You said to us, "I
13:14:28 10 said, 'It was Mr Taylor who sent me to go and train these people.
11 I was handed over to Mr Foday Sankoh to help him train the men.'" "
12 That is what you told us in the last two minutes you said to
13 these investigators in this interview.

14 A. That is what I said.

13:14:55 15 Q. You're making this up as you go along, aren't you?

16 A. No, I am not just making it up.

17 Q. Let me make it quite clear that later on in these many,
18 many interviews that you have you do then start to change your
19 story and say, "Oh, it was actually not Foday Sankoh but
13:15:23 20 Charles Taylor who recruited me", but you'd been well into being
21 interviewed by the Office of the Prosecution by the time you
22 start changing your story, hadn't you?

23 A. I don't think that they had started interviewing me when I
24 was changing my story.

13:15:54 25 Q. Well, we can look at that if we need to later. The first
26 time you are interviewed, we've already established, is the
27 better part of a year after they first approached you and you are
28 aware, when they do finally interview you, that they want to know
29 all you can tell them about you being with Charles Taylor. So,

1 why didn't you tell them that it was Charles Taylor who recruited
2 you to join the RUF?

3 A. Well, I think I said that: That it was Mr Taylor who sent
4 me to go and train those people. I said it many times.

13:16:43 5 Q. In that interview? That was a question. Are you saying
6 you said it many times in that interview?

7 A. Well, it could not be this particular interview now that
8 it's in front of me.

9 Q. Right. Now if we move on through that paragraph:

13:17:24 10 "Mongor was recruited by Foday Sankoh, leader of the RUF,
11 to join his mission to change the system in Sierra Leone. Mongor
12 was sent to help fighters for Sierra Leone. The name RUF was not
13 disclosed to recruits until a bit later. Sankoh recruited many
14 Sierra Leoneans living in Liberia. Training was at Camp Naama,
13:17:43 15 Liberia."

16 You were one of those Sierra Leoneans living in Liberia,
17 weren't you?

18 A. Yes, I was one of the people, but I was younger when I went
19 there.

13:18:05 20 Q. I'm only concerned to know that you identified yourself as
21 a Sierra Leonean living in Liberia?

22 A. Yes.

23 Q. And you were one of the many recruited by Foday Sankoh,
24 weren't you?

13:18:20 25 A. No.

26 Q. You changed your story, I suggest, when it became clear to
27 you that the Prosecution wanted more out of you by way of a
28 connection with Charles Taylor, but the first time you were
29 interviewed you gave them the truth, didn't you, by saying you

1 were recruited by Foday Sankoh, like many of your fellow Sierra
2 Leoneans living in Liberia?

3 A. No.

4 Q. Next paragraph, "Mongor was introduced to Sankoh by John
13:19:06 5 Kargbo who was an SSD member who was recruited from Sierra
6 Leone." Now, we've looked at that already, in a later interview
7 in July of the following year, and you stand by that, I think,
8 don't you, that you were introduced to Sankoh by John Kargbo?

9 A. I spoke about introduction, yes, but I said that I knew
13:19:51 10 Foday Sankoh even before then, but I went closer to him through
11 John Kargbo who introduced him as his brother.

12 Q. I see, so that is right: "Mongor was introduced to Sankoh
13 by John Kargbo", yes? That's correct, isn't it?

14 A. Yes, he introduced him to me, but I have told you before
13:20:20 15 now that I had seen Mr Sankoh before.

16 Q. I just want a yes or no answer, please, to a simple
17 question.

18 A. Yes, it's a simple question, but I cannot just say yes or
19 no. If there is something that I need to add I will put it
13:20:38 20 across just for you to know. It was not John Kargbo who was the
21 first person to make me know Foday Sankoh.

22 Q. Who got it wrong, Mr Mongor, in the previous paragraph when
23 it says you were recruited by Foday Sankoh? Was it you who got
24 it wrong, or was it the investigators who wrote it down wrongly?
13:21:04 25 They got it right in the next paragraph, didn't they?

26 A. What did you say?

27 Q. I'm sorry, I interrupted you. They got it right in the
28 next paragraph that you were introduced by John Kargbo. Who got
29 it wrong in the previous paragraph, the investigators or you?

1 A. Well, what I am telling you, the first one is not correct.
2 The one where you said it was John Kargbo who introduced - I will
3 say the investigators got me wrong, but the one which you said
4 John Kargbo introduced and I agree, yes, he introduced the man to
13:21:56 5 me, but before then I had known Foday Sankoh to be one of the
6 Special Forces.

7 Q. The next paragraph, please:

8 "Camp Naama was formerly a military barracks for the
9 Liberian army. It was provided to Foday Sankoh by
13:22:12 10 Charles Taylor. Mongor never saw Charles Taylor, or was aware of
11 Charles Taylor being there."

12 Is that right?

13 A. Yes, Charles Taylor never went to the camp while the
14 training was going on.

13:22:37 15 Q. So they've got that right, the investigators who are
16 recording what you told them?

17 A. Yes, which says that Charles Taylor never went to that
18 training base, yes, that is correct. He never went to that
19 training base.

13:22:55 20 Q. Next paragraph, "They started training in 1990," is that
21 correct?

22 A. 1990, yes, we started the training in 1990, yes, 1990.

23 Q. "... at base until March 1991 when they entered Sierra
24 Leone." Have they got that right?

13:23:25 25 A. Yes.

26 Q. So you started training in 1990 and you remained at base
27 until March of 1991 when you entered Sierra Leone?

28 A. Yes.

29 Q. You weren't running backwards and forwards between the RUF

1 and the Executive Mansion to perform guard duties for Mr Taylor
2 with an anti-aircraft gun. You were at base, as it says here,
3 until March of 1991 when you and the rest of the first RUF
4 fighters entered Sierra Leone. That's correct, isn't it?

13:24:16 5 A. Yes, but I have something to clarify to you regarding this
6 1990.

7 PRESIDING JUDGE: Have you finished your answer,
8 Mr Witness? You said, "I want to tell you something."

9 THE WITNESS: Yes, if the lawyer can permit me, or if I can
13:24:51 10 be permitted to clarify something here which says something about
11 1990.

12 MR MUNYARD:

13 Q. The lawyer is not preventing you. I was waiting for the
14 rest of your answer.

13:25:04 15 A. Okay. What I want to tell you, when you asked me that from
16 1990 to 1991 I was at the base and that I was not there moving
17 now with the anti-aircraft, moving with Mr Taylor, I told you
18 that I had performed that duty before I went to that base. That
19 is what I want to clarify to you, sir.

13:25:42 20 Q. Well, I'm not suggesting that you have never said that you
21 were at the Executive Mansion acting as a guard between 1990 and
22 1991 because you have said that, but what I do suggest, Mr Mongor
23 - and I want you to listen to this carefully - is that this
24 sentence here, "They started training in 1990 and at base until
13:26:11 25 March 1991 when they entered Sierra Leone", is actually much
26 closer to the truth than this story of you running backwards and
27 forwards between the RUF and the Executive Mansion Guard.

28 PRESIDING JUDGE: I don't recall him saying he was running
29 back and forth between the RUF and the Executive Mansion.

1 MR MUNYARD: I think it's in his evidence. He may not have
2 used the expression "running". Going.

3 PRESIDING JUDGE: Sorry, Mr Koumjian, you are on your feet.

4 MR KOUMJIAN: I agree with your Honour. There was never
13:26:44 5 testimony from the witness that he was leaving the camp. He
6 testified about events and fighting and his duties in the
7 Executive Mansion before his duties as a trainer at Camp Naama.
8 I don't recall any testimony about him running back and forth, or
9 being transferred in those duties.

13:27:02 10 MR MUNYARD:

11 Q. Well, let me ask you to clarify it, Mr Mongor. On your
12 account you have both been recruited in early 1990 to go to work
13 with Foday Sankoh and train the RUF at Camp Naama, and you've
14 also been working at the Executive Mansion Guard from early 1990
13:27:24 15 to March of 1991. So, how do the two overlap unless you went
16 back and forth between them?

17 A. I went to the base which I told you was in March 1990, I
18 went there, and at that time I had been performing the duty,
19 which I told you I was moving with the AA vehicle, going with
13:28:07 20 Mr Taylor to the front line around that Coca-Cola factory, before
21 I came to this training base. That is what I want to clarify to
22 you. When I came to the base I never told you I left the base to
23 go and perform any duty at the Executive Ground, no.

24 Q. All right. Well, we can answer that question and
13:28:26 25 Mr Koumjian's question by looking across to page 23020, first
26 bullet point --

27 PRESIDING JUDGE: Sorry to interrupt you, Mr Munyard, but
28 unfortunately we're just at our time limit. Can you please
29 reserve the full question until after the lunch adjournment?

1 MR MUNYARD: I can, but can I just say one thing for the
2 benefit of the parties?

3 PRESIDING JUDGE: Yes.

13:28:53

4 MR MUNYARD: It doesn't say "running", but it does say
5 "going back and forth from duties with the EMG and training
6 recruits for Sierra Leone at Camp Naama from March 1990 to March
7 1991" and that, in my submission, is consistent with the evidence
8 that this witness has already given. I'll come back to that.

9 PRESIDING JUDGE: Thank you, Mr Munyard. I have noted it.

13:29:23

10 Mr Witness, we're going to take the lunchtime break now.

11 We will resume court at 2.30. Please adjourn the Court.

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

13 [Upon resuming at 2.30 p.m.]

14:28:46

14 PRESIDING JUDGE: Mr Munyard, I actually interrupted a
15 question you were asking and you were referring to another piece
16 of the Defence bundle.

17 MR MUNYARD: Yes, your Honour, you informed me quite
18 properly that the tape had run out and therefore what I was about
19 to ask would not be broadcast and so I will start again if I may.

14:29:11

20 PRESIDING JUDGE: Please do so.

21 MR MUNYARD:

14:29:39

22 Q. Mr Mongor, before we broke for lunch I put to you that you
23 had been running between duties as Mr Taylor's Executive Mansion
24 Guard and training the RUF. Mr Koumjian for the Prosecution
25 objected and said that you had never said that you had been going
26 between the two. Would you look, please, at page 23020 in the
27 first tab. Now is this the document that you were reading when
28 we just came into Court earlier that Madam Court Officer closed?
29 In other words, did you have a chance to look at it in the last

1 five minutes as you were sitting there at the desk reading that
2 document when we came in?

3 JUDGE SEBUTINDE: Mr Munyard, are you suggesting the
4 document was not collected from the witness's desk before?

14:30:47 5 MR MUNYARD: Whether or not it was collected, certainly he
6 was reading it. It was open, he was reading it intently when we
7 came in at about 26 minutes past and I asked Madam Court officer
8 to close it. I don't know where it came from:

9 Q. Mr Mongor, have you just had an opportunity to read the
14:31:09 10 passage that I was referring to before the lunch break?

11 A. Yes.

12 Q. And what do you say about that? Were you going back and
13 forth from duties with the Executive Mansion Guard and training
14 recruits for Sierra Leone between March 1990 and March 1991, or
14:31:33 15 is that something else that the investigators have incorrectly
16 recorded?

17 A. Well, I used to do it, but later I stopped doing that.

18 Q. Tell us when you started and when you stopped?

19 A. I started at the early stage when I went to the base, that
14:32:04 20 was when I would come and return, because at that time we hadn't
21 many recruits at the base. So that was why I used to go and
22 return. But the time we had many recruits when the training was
23 going on I was not going to the ground any more.

24 Q. So when was that? Help us, please?

14:32:39 25 A. It was in that same March 1990. That's what I'm talking
26 about.

27 Q. Well, let's just understand what you were doing between
28 becoming involved with the NPFL in December of '89 and March of
29 1990. You train at a camp in Gborplay, yes? Is that right? I

1 am just going to take you through just to see how we can
2 understand how busy you were between your initial involvement
3 with the NPFL and March of 1990. The first thing that happens is
4 you get trained for two months at Gborplay, yes?

14:33:31 5 A. Yes.

6 Q. Then you go off to fight?

7 A. Yes.

8 Q. And I have slightly lost track now of where you said you
9 went, but is this the position: That you go off to Ganta and

14:33:49 10 Gbarnga and Kakata and Monrovia, the Coca-Cola factory? You do
11 all of that between finishing training and March of 1990. Is
12 that correct?

13 A. Yes, I did those things.

14 Q. And then back up to Gbarnga for a spot of Executive Mansion
14:34:19 15 Guard job, is that right?

16 A. Yes, I want to tell you that when I was going back to the
17 front line, at that time I was already with the mansion guard
18 unit. I think I said this before. I don't want you to evade
19 that one.

14:34:38 20 Q. I am not evading it. I haven't lost sight of that. That's
21 why I said you go back to Gbarnga for a spot of mansion guarding
22 and then you nip over to Camp Naama to start training RUF
23 recruits, yes?

24 A. Yes.

14:35:01 25 Q. This is all in that handful of months December, January,
26 February, March, and is that what you want these judges to
27 believe, that you did all of these things?

28 A. Yes.

29 Q. Did you actually get to the Coca-Cola factory?

1 A. Yes, I went there.

2 Q. So you get all the way to Monrovia, you get all the way to
3 Gbarnga, you go over to Camp Naama and you train people and you
4 come back for a bit of Executive Mansion guarding. And then when
14:35:46 5 does it get busy at the RUF camp? When do you start doing the
6 RUF camp full-time?

7 A. I began the full-time - as I told you, I went there in
8 March and when I went there initially there wasn't much
9 recruitment so I used to go and return. So I started that almost
14:36:18 10 towards the end of the March, that was when the training was in
11 full force, because at that time we had already taken a lot of
12 people to the base.

13 Q. And so is this the picture: That really from the end of
14 March you are full-time at Camp Naama training RUF recruits?

14:36:56 15 A. From March, yes. It was from March.

16 Q. And you continue to be there full-time until the invasion
17 of Sierra Leone on 23 March 1991?

18 A. Yes, when the training had started I did not return. I was
19 there until 1991 when we went to Sierra Leone.

14:37:30 20 Q. So if you go back to page 23019, halfway down the page
21 where it says, "They started training", do you see that,
22 Mr Mongor? It's the fifth point on that page, right in the
23 middle?

24 A. Yes, I can see it.

14:38:09 25 Q. I suggested to you this morning that that was accurate,
26 that you started training the RUF in 1990 and you were at the
27 base training them until March of 1991 and you weren't involved
28 in guarding or working with Mr Taylor or the NPFL at all?

29 A. I don't want to agree with you, my Lord.

1 Q. Well, you just did agree with me a moment ago, because I let
2 me read what I asked you: "Is this the picture: That really
3 from the end of March you are full-time at Camp Naama training
4 RUF recruits?" Your answer: "From March, yes. It was from
14:39:02 5 March." My next question: "And you continued to be there
6 full-time until the invasion of Sierra Leone on 23 March 1991?"
7 Your answer: "Yes, when the training had started I did not
8 return. I was there until 1991 when we went to Sierra Leone".
9 So you are agreeing with the sentence that we have just been
14:39:27 10 looking at on page 23019, aren't you?

11 A. I want to --

12 PRESIDING JUDGE: Just pause, Mr Witness, please,
13 Mr Koumjian wishes to say something.

14 MR KOUMJIAN: I just think there is a vagueness in the
14:39:44 15 question, because it's not clear when you say you were not
16 involved at all with the Executive Mansion Guard - I'm sorry, I
17 don't have the words right in front of me - whether that is
18 talking about at all or after March 1991 and I believe there is a
19 confusion as to what the question is. Is it at all ever, or
14:40:05 20 after March of 1990?

21 MR MUNYARD: I am afraid in one it's too late to raise that
22 because we have moved on. We have now gone to a different point.
23 I don't mind dealing with that, but I will come back to it later
24 if I may and reparticularise it, but we're now on a different
14:40:20 25 point and I would like the witness to deal with the different
26 point.

27 PRESIDING JUDGE: Very well. Deal with the point you're re
28 on, Mr Munyard, but we will have to come back to Mr Koumjian's
29 point.

1 MR MUNYARD: Very well:

2 Q. Mr Mongor, that sentence in the middle of page 23019 is
3 correct, isn't it? You started training in 1990 and you were at
4 base until March of 1991 when you entered Sierra Leone?

14:40:55 5 A. Yes.

6 Q. And you were trying to suggest earlier, weren't you, that
7 that wasn't correct?

8 A. Yes, I want to make something clear because you said I was
9 not involved in the Executive Mansion Guard, but what I want to
10 tell you is I only did the duty of the Executive Mansion Guard
11 before I went to the training base, but if you are saying that I
12 never took part in the Executive Mansion Guard duties that is
13 what I want to bring to your notice, that within that same year,
14 1999, I was part of the Executive Mansion Guard before I went to
15 the base at Camp Naama to perform that training.

14:41:36 16 Q. I am not going to get distracted by an earlier point. I
17 want you to concentrate on the sentence in the middle of page
18 23019 and confirm, please, that it is correct. If you want to
19 deal with your evidence in English then feel free to do so, but
14:42:05 20 make a choice, please. It is to be Krio or is it to be English
21 in?

22 MR KOUMJIAN: I'm sorry, but I don't believe counsel would
23 know what is Krio and what is English unless I am incorrect.
24 Krio does include a lot of English words.

14:42:20 25 MR MUNYARD: The witness is trying to answer my question
26 almost before I have finished it which suggests that, unless the
27 interpreter is working at breakneck speed, he is dealing with the
28 evidence in English. I will move on or I'll move back, rather,
29 to the point:

1 Q. You were full-time training the RUF from March of 1990 to
2 March 1991 at the base, Camp Naama, weren't you?

3 A. I was at Camp Naama, yes, training.

4 Q. Full-time?

14:42:56 5 A. When you say full-time I want to make - I want you to make
6 that clear for me.

7 Q. That's all you were doing between March 1990 and March
8 1991?

9 A. No, not - it was not from the beginning of March. That was
14:43:23 10 not the only thing that I was doing.

11 Q. The end of March 1991 you are full-time at Camp Naama
12 training the RUF recruits?

13 JUDGE SEBUTINDE: 1990. March 1990.

14 MR MUNYARD: I beg your pardon. I am so sorry:

14:43:42 15 Q. And your answer earlier on page 91 was: "From March, yes.
16 It was from March". My next question was: "And you continued to
17 be there full-time until the invasion of Sierra Leone on 23 March
18 1991". Your answer was: "Yes, when the training started I did
19 not return".

14:44:01 20 You know perfectly well what full-time meant because you
21 answered demonstrating that you knew what it meant. It means you
22 didn't return to anything else. Now is that right? Do you agree
23 that you were at Camp Naama from the end of March 1990 until the
24 invasion in March of 1991 and you didn't return?

14:44:35 25 A. Yes, from the end of March - from towards the end of March
26 I was at the camp training.

27 Q. Yes. So all I want to ask you is that the investigators
28 have correctly recorded what you were telling them on page 23019
29 about your activities training the RUF?

1 A. Yes, I was training the RUF.

2 Q. Just before we leave that particular interview, can I ask
3 you this: It says two points above that, and we have looked at
4 it already this morning: "Mongor was introduced to Sankoh by
14:45:35 5 John Kargbo who was an SSD member who was recruited from Sierra
6 Leone". Who was doing the recruiting in Sierra Leone?

7 THE INTERPRETER: Could counsel please go over that
8 carefully before I interpret?

9 MR MUNYARD: Yes:

14:46:01 10 Q. Who was doing the recruiting of people in Sierra Leone for
11 the RUF?

12 A. The people who were doing the recruiting for Sierra Leone,
13 there was Pa Kallon who was the advisor to Foday Sankoh in Sierra
14 Leone, when he was in Liberia he was doing the recruitment. And
14:46:37 15 John Kargbo, he too went to join the Pa whom I have just referred
16 to, that is Mr Kallon. They were going in search of other
17 people. Some of them were in prison.

18 Q. Right. Can we move on to the next interview.

19 JUDGE SEBUTINDE: Mr Munyard, excuse me, but the answer
14:47:11 20 that this witness has given - the question you asked who was
21 doing the recruiting in Sierra Leone.

22 MR MUNYARD: Yes.

23 JUDGE SEBUTINDE: Now the answer he just gave says the
24 people who were doing recruiting for Sierra Leone. I am not sure
14:47:27 25 that he is answering the question.

26 MR MUNYARD: That's quite right, your Honour.

27 JUDGE SEBUTINDE: For Sierra Leone could mean anywhere on
28 the face of the earth.

29 MR MUNYARD: Yes, absolutely right:

1 Q. Who was doing the recruiting in Sierra Leone?

2 A. From Liberia or inside of Sierra Leone?

3 Q. I thought the word "in" was a pretty straightforward one,
4 but let me have another go. "In" meaning inside the country?

14:48:02 5 MR KOUMJIAN: Well, perhaps it would be clearer if you
6 specify inside Sierra Leone.

7 MR MUNYARD: If my learned friend wishes me to do that then
8 I will, but it seems to me that this is unnecessary.

9 PRESIDING JUDGE: I think it is fairly clear.

14:48:19 10 MR MUNYARD:

11 Q. Inside Sierra Leone. Does it need explaining any more
12 clearly than that, Mr Mongor?

13 A. Inside Sierra Leone when the war was going on?

14 Q. No, who was doing the recruiting that included the
14:48:38 15 recruitment of John Kargbo who was a Sierra Leonean policeman
16 before the war? This is the man who introduced you to Foday
17 Sankoh, according to at least some of the accounts you have
18 given?

19 A. Well, when you are talking about recruiting in Sierra Leone
14:48:59 20 then I just took it to be that it was the time when we were
21 already in Sierra Leone when the recruitment was going on. That
22 was what I thought you were referring to. But if you are asking
23 who was doing the recruitment in Liberia, because it was in
24 Liberia that the RUF people were trained.

14:49:17 25 PRESIDING JUDGE: No, in Sierra Leone.

26 MR MUNYARD: I am prepared to move on. I am not going to
27 waste any more time on this.

28 JUDGE SEBUTINDE: Mr Witness, if you don't know an answer
29 it's okay to say you don't know.

1 THE WITNESS: Well, I don't know in Sierra Leone who was
2 recruiting.

3 MR MUNYARD:

4 Q. Look, please, at page 23020 again, a little bit down from
14:49:53 5 the top, continuation of interview of Isaac Mongor at 9.50 in the
6 morning and the date is spelt backwards, but it is 3 September
7 2006, in the interview room:

8 "Mongor was an ordinary soldier in the NPFL; he was in the
9 Executive Mansion guard from early 1990 to March 1991; he was
14:50:19 10 going back and forth from duties with Executive Mansion guard and
11 training recruits for Sierra Leone, the future RUF, at Camp Naama
12 from about March 1990 to March 1991."

13 Now, that is different from what you have told us this
14 afternoon in evidence, isn't it, because in evidence you have
14:50:44 15 said, "From the end of March 1990 I was at Camp Naama training
16 RUF recruits and I did not return from there before we invaded
17 Sierra Leone in March of 1991"?

18 A. Yes, I want to clarify some points here. When I said I
19 would go back and forth, which is stated here, I told you it was
14:51:20 20 when I went to the base initially when the training was not
21 actually in full force. So, at that time I will come and return,
22 but when we started getting more of the recruits when the
23 training started full swing, I did not go there any more. That
24 is what I want you to understand.

14:51:45 25 Q. Well, I think we all understood that already. What I am
26 asking you about is, if that is the case, why have you told the
27 investigators that you were going back and forth from March 1990
28 to March 1991 when we now know that you didn't go back at all
29 after the end of March 1990?

1 JUDGE SEBUTINDE: Mr Munyard, to be fair --

2 THE WITNESS: I came --

3 JUDGE SEBUTINDE: Excuse me. To be fair to the witness,
4 when you look at that page, 23020, he says "from early 1990 to
14:52:25 5 March 1991". Early 1990 could mean January.

6 MR MUNYARD: Oh, yes.

7 JUDGE SEBUTINDE: That is when he was going back and forth
8 and then the sentence ends that he trained recruits, future RUF,
9 at Camp Naama from about March 1990 to 1991. So, the going back
14:52:44 10 and forth does not necessarily relate to the March 1990 to March
11 1991, which relates to the training.

12 MR MUNYARD: Well, with great respect to your Honour, there
13 is a semicolon that is very important and can I just take it as I
14 see it, "Mongor for was an ordinary soldier in the NPFL;" new
14:53:10 15 idea, new concept, "he was in the Executive Mansion guard from
16 early 1990 to March 1991;" next thought, or concept, "he was
17 going back and forth from duties with the Executive Mansion guard
18 and training recruits for Sierra Leone at Camp Naama from about
19 March 1990 to March 1991." So, with respect I think it does
14:53:42 20 suggest - the grammar certainly suggests to me that the going
21 back and forth does not relate to the previous words, but the
22 going back and forth is all part of the sentence that includes
23 "from duties with the EMG and training recruits". However, again
24 it is another point that I think I have probably flogged to
14:54:09 25 death.

26 JUDGE SEBUTINDE: I think you are absolutely right to
27 demand for an explanation. It is vague. It is capable of
28 several meanings.

29 MR MUNYARD: Thank you:

1 Q. May I say, and I am saying this to you, Mr Mongor, I don't
2 know whether it is correct or not, but I would not dispute the
3 fact that you were recruited by Foday Sankoh to work - to train
4 the RUF in Liberia and then entered Sierra Leone with them when
14:54:47 5 they began their invasion. What I am suggesting is that you were
6 not at the Executive Mansion and certainly not in the Executive
7 Mansion at Gbarnga in 1990 because it didn't exist. Do you
8 agree, or not?

9 A. I disagree.

14:55:09 10 Q. We will move on. Still on page 23020, I just want to clear
11 up one point. I asked you yesterday if, after being the acting
12 battle group commander in 1992, when Rashid Mansaray came from
13 Kailahun in 1993 did you go back to being a battalion commander
14 in the field and you said no, you didn't. Would you have a look,
14:55:51 15 please, at the third paragraph in your interview on 3 September
16 2006 that starts with the words, "John Kargbo was initially the
17 battle group commander". Do you see that paragraph?

18 A. Yes.

19 Q. Go halfway through it and do you see on the right-hand
14:56:21 20 side, three lines down, it says:

21 "Early in 1992 Mongor replaced Kargbo as battle group
22 commander. Mongor believes it was April 1992. He was the acting
23 battle group commander and when Rashid Mansaray came to Kailahun
24 from Pujehun in early 1993, Mongor went back to being a battalion
14:56:44 25 commander in the field."

26 Do you see those words?

27 A. I see them.

28 Q. Yes. Those were the words I actually read out to you
29 yesterday and you said, no, that wasn't right, you didn't go back

1 to being a battalion commander.

2 A. Yes.

3 Q. Now, did you, or didn't you?

4 A. I went, but it was not that I was a battalion commander
14:57:17 5 because you don't know what was the structure of the RUF. When
6 you are talking about a battalion commander that is different.
7 That is another thing that you are referring to. I am telling
8 you that I did not go there as a battalion commander, but within
9 the 2nd Battalion I was there. This man took over - took over
14:57:45 10 the commandership as battle group there.

11 THE INTERPRETER: Your Honours, can the witness please
12 repeat the last part of his evidence. He is going too fast.

13 PRESIDING JUDGE: Mr Witness, you are talking too quickly
14 for the interpreter. Please go back to the point where you say
14:58:03 15 "this man took over" and continue from there.

16 THE WITNESS: I said Rashid Mansaray took over as battle
17 group commander for 2nd Battalion and in that battalion I was
18 also a member. I was within that battalion, but I went back to
19 the front line because I was taken from the front line and
14:58:30 20 brought there to be acting battle group commander, so when I gave
21 him the position back I went back to where I was.

22 MR MUNYARD:

23 Q. Mr Mongor, why did you tell the investigators that you went
24 back to being a battalion commander if you didn't?

14:59:01 25 A. It was not a battalion commander. I did not talk about
26 battalion commander. I said I went back to become a front line
27 commander within the same battalion. I was a commander within
28 the same battalion, but not the battalion commander.

29 Q. Look at the page. Look at that last line, that sentence.

1 Is that what you told the investigators, or isn't it?

2 A. My Lord, I am telling you that what I am telling you here
3 is what I know about and that is what happened.

4 Q. Right, now answer the question.

15:00:06 5 A. I said it did not happen this way.

6 Q. No, answer the question, please.

7 A. I did not go back as battalion commander.

8 Q. Answer the question, please.

9 A. There cannot be two battalion commanders in the same
15:00:27 10 battalion, 2nd Battalion, so to say that I went back as a
11 battalion commander, I don't think that that would be right:
12 That I went back as battalion commander.

13 PRESIDING JUDGE: Mr Witness, that is not the question.

14 The question is why did you tell the --

15:00:45 15 MR MUNYARD: Actually, your Honour, it is not, it is "did
16 you".

17 PRESIDING JUDGE: Did you tell the people interviewing you
18 that you, I quote, "went back to being a battalion commander in
19 the field"?

15:00:56 20 THE WITNESS: No, I did not say that: That I went back to
21 the field to be a battalion commander. I went there to be a
22 commander at the front line.

23 MR MUNYARD:

24 Q. Please stop. We have already got what you say you did. We
15:01:19 25 are only asking at this point what did you tell the
26 investigators. So, they have got that wrong, yes?

27 A. Because I spoke about commander at the front line. Yes, I
28 see it. I can see it, but I said I spoke about going back to the
29 front line as a commander. I was under the battalion, but I went

1 to the front line as a commander, not as battalion commander, but
2 front line commander.

3 Q. Mr Mongor, I am not going to persist with this any longer,
4 but do you appreciate that I am not asking you about what
15:01:57 5 happened in 1993. I am asking you about what happened when you
6 were interviewed in the year 2006 by investigators from the
7 Prosecution. Do you understand that is what we are talking
8 about? [Overlapping speakers]

9 A. I do understand what you are talking about.

15:02:20 10 Q. Did you tell them this, that they have written down? I
11 think you have already answered that you didn't, so does it
12 follow that they have made a mistake in recording that as what
13 you were telling them?

14 A. Maybe it was as a result of the language barrier. Maybe
15:02:49 15 the way I talk, maybe when I said "commander" the person might
16 have thought that I was talking about battalion commander. I was
17 under the battalion, but I was not the battalion commander.

18 Q. This is one of the interviews that you told us yesterday
19 was read back to you so that you could correct any mistakes. So,
15:03:13 20 is this the position: They have made a mistake in wrongly
21 recording what you told them and you have compounded that mistake
22 by failing to correct it? Is that your evidence on this?

23 A. No.

24 Q. So they have made a mistake, I think that is what you are
15:03:43 25 saying in recording this. You have made a mistake as well,
26 haven't you, when they read it back to you, in failing to stop
27 them and say, "Hang on a minute, I never said that"?

28 A. Yes, the mistake was not a one-sided thing. It was from
29 both ends.

1 Q. We can move on. Oh, yes. Now, that was a Sunday, that
2 interview, 3 September 2006. Had you been working in the shop on
3 the Sunday, or would you have been working in the shop on the
4 Sunday, the Lord's day?

15:04:51 5 A. Sunday, no, I didn't work in the shop. I used to go to
6 church. From the church I didn't go to the shop.

7 Q. Can I just clarify one thing: The shop was selling
8 drinking water, wasn't it?

9 A. Yes, I had a machine there that I used to process water.

15:05:14 10 Q. Yes. That was what you did? That was your business in the
11 shop?

12 A. Yes, that was what I was doing there.

13 Q. Just so we understand, right. Had you been working in the
14 shop, or would you have been working in the shop on 30 August,
15:05:40 15 that was the Wednesday before when we see your first interview,
16 the one that we started with?

17 A. I would like you to repeat that point. I didn't get it
18 clearly.

19 Q. On the Sunday, this is the second interview, you wouldn't
15:06:12 20 have been working in the shop because you would have been at
21 church, but you had already been interviewed on the Wednesday
22 previously, which is 30 August. If you hadn't been interviewed
23 on the Wednesday would you have been working in the shop?

24 A. Yes.

15:06:39 25 Q. So you would have lost wages, or earnings, by being
26 interviewed. You are interviewed - we can see from the beginning
27 and end of that one that you are interviewed between about 20 to
28 2 in the afternoon and 4.30. Did they compensate you for loss of
29 earnings for not being able to work in the shop and sell water?

1 A. Well, they did not tell me that we are paying you because
2 you did not sell at the shop. They did not make that - they did
3 not tell me that, that, "Because you did not work at the shop so
4 we are paying you. This is the payment for that."

15:07:29 5 Q. I just wanted to be clear that your answers to me
6 yesterday, that you stand by those answers: That you were never
7 given any money to compensate you for loss of earnings. You are
8 standing by that today, aren't you?

9 A. They gave me money which I told you about yesterday, that I
15:07:51 10 received money, but I was not told that it was because of what I
11 had lost. If that was the case they were not supposed to decide
12 for me. They would have asked me, "What is your lost wage?", and
13 then I would have made the estimate. They were not to decide for
14 me and I did not say so, so I cannot say they gave me lost wages.
15:08:16 15 That is what I said yesterday.

16 Q. I think yesterday you might have said, and I will be
17 corrected if I am wrong, that you were paid for --

18 A. I told you --

19 Q. That you were paid for transport or meals. If I am wrong
15:08:31 20 on that I will be corrected, but is that right? You tell me if I
21 am right or wrong.

22 A. That was what I said. That was what I said yesterday,
23 because now you are asking me if I was being given lost wages and
24 I told you no, they did not give me money saying that it was lost
15:08:55 25 wages.

26 Q. Right. Did they give you money and tell you what it was
27 for, or did they not give you any money?

28 A. They gave me money.

29 Q. Did they tell you what it was for?

1 A. Well, they told me that, "We are giving you this money. It
2 is for your transportation fare, the time that you spent here and
3 that you can use some of it for food and for your transportation
4 fare."

15:09:37 5 Q. Well, all right. Would you turn, please, to tab 17. Do
6 you have that, Mr Mongor?

7 A. Yes.

8 Q. Is it a document that is headed "Special Court for Sierra
9 Leone, All Disbursements For Witness". Is that the heading? I
15:10:25 10 can't see what you are looking at. I'm just asking you to
11 confirm that were all looking at the same page?

12 A. Are you talking about 17?

13 Q. I think we are now on the right page, is that right? Yes?
14 Now would you look here please. In the left-hand side there is
15:10:49 15 the logo of this Court. Do you see that?

16 A. Yes.

17 Q. Below that there is the Court initials and a number. Do
18 you see that?

19 A. Yes.

15:11:08 20 Q. And underneath that is this, "TF1-532". Do you see that?

21 A. Yes.

22 Q. Do you know what TF1-532 means?

23 A. TF what?

24 Q. Well, just look at it. It's TF1-532. Do you know what
15:11:36 25 that means?

26 A. Yes, I know what it means.

27 Q. What does it mean?

28 A. Well, they told me that that was my witness identification
29 number.

1 Q. Right. So that's you. That's all I wanted to establish?

2 A. Yes.

3 Q. This is a document about you and is there a handwritten
4 date there of 28 February 2008, yes?

15:12:05 5 A. Yes.

6 Q. Now did you go and see the Office of the Prosecution and
7 meet with them before you were interviewed? Did you go and see
8 them two days before the first interview?

9 A. In what year?

15:12:28 10 Q. Monday 28 August 2006?

11 A. You said I went and met with them two days before?

12 Q. Two days before that first interview that we were looking
13 at just before?

14 A. Yes.

15:12:52 15 Q. And did you tell them things when you saw them on that
16 occasion? Did you give them information on that occasion before
17 you saw Mr Kolot with the interpreter?

18 A. Gave them what, please? Repeat that.

19 Q. Any information?

15:13:25 20 A. That day when they had spoken to me I told them that I was
21 willing to testify to work with them.

22 Q. Right. And were you told that you would be paid for loss
23 of earnings if you lost anything as a result of spending time in
24 their company giving them information?

15:13:52 25 A. Well, it is that expression that you are talking about
26 that, that things that I lost, that confuses me. I don't want
27 you to say that if they said to me that I lost anything, they
28 were not to tell me - they were not supposed to specify what I
29 had lost. I was supposed to make my estimate, not the other way

1 round. They did not tell me that if you have lost anything that
2 we are going to refund that. That is what confuses me.

3 Q. Simple question: Did you tell them how much you would be
4 likely to lose in earnings if you spent an afternoon sitting in
15:14:40 5 an interview room giving them information?

6 A. I did not tell them that if I leave my shop to talk to you
7 that I will be losing this and that amount. I did not tell them
8 that.

9 Q. All right. Well, on 28 August 2006 we can see that you
15:15:08 10 were paid 20,000 leones for transport and meals. Do you see
11 that? The top box?

12 A. Yes, I can see it.

13 Q. Did you have to travel far to get to them?

14 A. I did not travel far. I used a vehicle.

15:15:37 15 Q. You used a vehicle. What sort of vehicle? Is it a bus?

16 A. No, it was not a bus. That was my area and in that area
17 there are no buses running around there.

18 Q. Just tell us. When you say you used a vehicle did you get
19 a lift from a friend or did you pay for a ride in a shared taxi,
15:16:05 20 or what?

21 A. I boarded a taxi.

22 Q. How much did the taxi cost from where you lived to the
23 Office of the Prosecutor at the Special Court?

24 A. It is nearly 1,000 leones.

15:16:33 25 Q. Nearly 1,000, right?

26 A. Yes, because if you give them 1,000 they will give you a
27 change of 100 leones.

28 Q. All right. And we know that you are interviewed at 20 to 2
29 until about half past 4, so had you already had your lunch by the

1 time you went for interview?

2 A. Yes, I had eaten something.

3 Q. Right. Well, have a look there and see - tell us why you
4 got 20,000 leones for a taxi ride that costs 900 and you'd

15:17:17 5 already had your lunch?

6 A. Well, I think that question, my Lord, I think the WVS would
7 be in the right position to answer that question why they gave me
8 20,000 leones when the distance that I covered was 1,000. Maybe
9 that is their own administrative prerogative. I did not go into
10 the details of their administrative procedures.

15:17:51

11 Q. You knew perfectly well that you were going to be able to
12 make some money out of cooperating with the Office of the
13 Prosecutor, didn't you?

14 A. My cooperation with the Prosecution was never based on
15 monetary issues.

15:18:15

16 Q. I didn't actually say that. Let me repeat the question.
17 You knew perfectly well that you were going to be able to make
18 some money out of cooperating with the Office of the Prosecutor,
19 didn't you?

15:18:37

20 A. I was not thinking about that.

21 Q. Were you thinking about the possibility that you yourself
22 might be prosecuted if you didn't help them?

23 A. I was not thinking about even that.

24 Q. I see. Let us go on to the next box, number 2. On

15:19:12

25 Wednesday 30 August 2006, transport, meals, lost wages. Now on
26 that particular day you were interviewed as we can see from page
27 23020 from about ten to 10 in the morning until almost quarter to
28 12 that morning, 23022. So presumably you'd had your breakfast
29 when you went to see them, is that right, if you start the

1 interview at 9.50 in the morning?

2 A. Yes, I ate at my house before I went.

3 Q. Right. And we can see from page 23022 in tab 1 that that
4 interview concluded at 11.42, between 20 to and a quarter to 12.

15:20:23 5 So did you then go home and have lunch or go into town and have
6 lunch? I mean I am not suggesting you would necessarily remember
7 it now, but what would your normal practice be? Would your
8 normal practice be to have lunch around the middle of the day?

9 A. Yes, I ate when I went.

15:20:56 10 Q. So you ate after you'd had the interview?

11 A. No.

12 Q. You presumably weren't eating your way through the
13 interview and in fact I suggest, Mr Mongor, that you probably
14 won't remember now?

15:21:17 15 A. What time are you referring to, when the interview was
16 going on?

17 Q. No, I am saying after it was all finished at about a
18 quarter to 12 and you were free to go would it be your normal
19 practice to have lunch some time around 12 or later?

15:21:40 20 A. Well, for me I can eat at any time. Any time I feel like
21 eating. I don't have a particular hour, say I eat at 12 or - the
22 only thing is that I don't eat at midnight, but I can eat at any
23 time.

24 Q. But when you're working in the shop selling drinking water
15:22:03 25 what do you do about lunch? Do you bring something from home, do
26 you go home or do you go out and buy something?

27 A. Well, in the morning before I come to the shop I will make
28 sure I had my breakfast before I will go to the shop. So when I
29 will go to the shop, at times I could not eat anything except for

1 things like bread or I can buy soft drinks.

2 Q. But how much would you normally spend on food during the
3 course of the working day?

4 A. Well, I had other people who were working with me. It was
15:23:01 5 not because if I did not eat that I will not give them money to
6 eat. So I will make sure that every day I will give them
7 something like 10,000 leones so that they will get some food to
8 eat. At times I will give some money so they will cook for all
9 of us or they will bring it and we will eat together. But if I
15:23:23 10 was not going to eat maybe I could just take 10,000 leones and
11 give it to them and tell them to go and look for something else
12 to eat.

13 Q. How many men have you got working with you selling
14 processed drinking water in the bishop's shop?

15:23:44 15 A. Four.

16 Q. Four. And they are all working for you, are they?

17 A. Yes, yes. I had three men and a lady.

18 Q. I tried yesterday, and I am going to have one more stab at
19 it today, to find out how much on average you would earn per day
15:24:14 20 from selling the drinking water in a typical week. Now you've
21 had time to think overnight. Are you able to help the Court with
22 roughly how much you would earn per day if you totalled the up
23 and down business earnings in the normal course of a week?

24 A. My Lord, I want to tell you that I cannot tell you how much
15:24:51 25 I would make for the day. It is business. I told you it could
26 rise and fall. That is what I want to tell you.

27 Q. Cannot or will not? You know perfectly well, don't you,
28 Mr Mongor, how much your business was or was not bringing in in
29 an average week? You know that, don't you?

1 A. Yes.

2 Q. Well, you tell the Court how much it was bringing in in an
3 average week, how much profit you were making, if any?

4 A. That's what I am telling you or that's what I am trying to
15:25:39 5 tell the Court, that that is business. At times I could get what
6 I had already spent and there are times I would not get what I
7 had already spent because there were times you would not get
8 customers. The only thing I will do, I will put some money - say
9 for within two weeks I will put some money together for the sales
15:26:06 10 of two weeks and after another two weeks I will go and buy goods
11 and bring them into the shop. So for that two weeks that I -
12 maybe I will get 900,000 leones for two weeks, within that two
13 weeks. But then there are times, the other two weeks, I will
14 sell and maybe at times I may not even get that amount. Maybe it
15:26:30 15 could fall to 700 or 600. That was how it was.

16 Q. All right. Well, there's some figures we can work with.
17 And how much of that was profit? How much money were you
18 actually earning after you'd paid everybody's wages and rent or
19 whatever else you had to pay?

15:26:55 20 A. Well, the rent, the bishop had been paying for that place.
21 He had paid for that place for three years already. He had
22 rented the place for three years before I took those things into
23 the shop.

24 Q. Don't worry about the bishop, just tell us about how much
15:27:26 25 profit you were making?

26 A. Well, it depends on what I spent. It is - it would depend
27 on what I spent for the week. If I bought goods and put them
28 into the shop and the sales went on for two weeks maybe I will
29 get the money that I spent and get some profit like 5 or 400,000.

1 But there are times I will get more than that even. But the more
2 goods I got and again the more customers that I got then I will
3 get more profit.

15:28:15 4 Q. Back to box 2, please. You were paid on 30 August, the day
5 of that interview that we were talking about - you were paid
6 50,000. That was the first interview. 50,000 leones for
7 transport, meals and lost wages. Now does that come as a
8 surprise to you that you were paid for lost wages in the light of
9 what you were telling the Court yesterday and today?

15:28:42 10 A. You see, that is what I want to tell you, because you said
11 the money that I lost. If I am telling you about the money that
12 I will lose I will not tell you that I would lose 50,000 leones
13 per day in the shop when I had some other things in the shop that
14 I will get money from, not just water. You cannot tell me that I
15:29:08 15 will just get 50,000 leones per day, no.

16 Q. Mr Mongor, does it surprise you to see that you were paid
17 money for lost earnings, lost wages, bearing in mind that you
18 have told this Court not once, not twice, but many times that you
19 never gave the Prosecutors any idea of how much you were likely
15:29:31 20 to lose in wages? Does it surprise you to see that on that day
21 you were paid a sum for lost wages?

22 A. Well, if they were giving me the money I cannot be
23 surprised, but they did not just specify that the money was meant
24 for that, that it was because of lost wages, and nobody ever told
15:30:00 25 me that it is because of what you are losing from not going to
26 the shop, that is why we are giving you this money. Nobody told
27 me that.

28 Q. The last time: Does it surprise you therefore to see that
29 you have been paid for lost wages?

1 PRESIDING JUDGE: Mr Witness, do you understand the
2 question?

3 THE WITNESS: I understand it, Madam, but I am saying that
4 they gave me money and I received the money, but they did not
15:30:41 5 tell me the purpose for the money. I want the lawyer to know
6 this. They never told me that, "It was the money that you had
7 lost for not going to the shop." That is the point that I am
8 making to you.

9 MR MUNYARD:

15:30:55 10 Q. We have got that point, but I don't think you have got my
11 point and I am not going to dwell on it any further. Can we move
12 on to box 3, Sunday 3 September, when you would have been at
13 church and not at the shop, you were paid, yet again, exactly the
14 same sum for exactly the same reasons as on 30 August, 50,000
15:31:17 15 Leones for transport, meals and lost wages. But you didn't lose
16 any wages on the Sunday, did you, because you were at church and
17 not at the shop, or you would have been at church and not at the
18 shop?

19 A. Yes, I was at church, not at the shop.

15:31:38 20 Q. Well, you were actually at the Office of the Prosecutor
21 being interviewed as well.

22 A. Yes.

23 Q. Can you think of any reason why you would be paid a sum for
24 lost wages when you weren't working there?

15:31:58 25 A. Well, I said it before. From my opinion maybe that is the
26 way the Prosecution department would term the expenditure that
27 their witnesses, if they spend money on that that is the
28 terminology they use, but I did not go into details with them
29 because I don't know, and I didn't know, how the department

1 functioned, but that is my opinion, but they could be in a better
2 position to explain.

3 Q. Well, go back to box number 1. You are only paid there for
4 transport/meals, 20,000, and we know that that represented a
15:32:46 5 profit to you of 19,000 because you only had to spend about 1,000
6 on a shared taxi and you weren't being deprived of any meal by
7 being interviewed that morning. So you don't just get it every
8 time you turn up, do you? You get lost wages, presumably when
9 you tell them that you have lost earnings. So did you tell them
15:33:17 10 that you had lost earnings on that Sunday, 3 September?

11 A. No, no.

12 Q. All right. Well, we are going to look at some more of
13 these figures, but not right now. I am going to move back to a
14 different topic. In fact, can we have a look, please, at tab
15:33:56 15 number 4. This is an interview on 1 October 2006 at page 23796.
16 I wonder if Madam Court Officer could confirm that the witness
17 has got that page correctly open? Thank you. 1 October 2006 you
18 were interviewed at 10.20 in the morning, 10.20 in the morning,
19 and we can see by turning to the end of the interview that it
15:34:57 20 finishes at 1.20 in the afternoon, so it is a three hour
21 interview. Now, do you see below where it says, "Notes of Kolot
22 regarding continuation of interview", and the time and the place,
23 it starts, "Kolot had Mongor look at doing a timeline similar to
24 one done by Mike Lamin", and then do you see below that, "Kolot
15:35:33 25 reviewed with Mongor another witness's statement summary for
26 corroboration"? That witness is TF1-151 and someone hopefully
27 will tell me whether or not I can spell out the name because at
28 this point I don't know if I can.

29 MR KOUMJIAN: Your Honour, can we take a brief private

1 session? I can answer that question.

2 MR MUNYARD: I don't need it at the moment.

3 MR KOUMJIAN: I do need a private session if we could.

15:36:08

4 PRESIDING JUDGE: What is the purpose, Mr Koumjian? Is
5 there a problem?

6 MR KOUMJIAN: Yes.

7 PRESIDING JUDGE: I see. Mr Munyard, you have heard the
8 application. Have you any objection?

15:36:17

9 MR MUNYARD: Yes, I would like to have at least some
10 inkling, even in neutral terms, of the nature of the problem. I
11 think we all deserve that before we plunge into darkness as far
12 as the outside world is concerned.

13 JUDGE LUSSICK: It is to do with witness security, is that
14 right?

15:36:30

15 MR KOUMJIAN: With obeying court orders, yes.

16 MR MUNYARD: I am quite content not to - I am not pressing
17 for the name. I just asked do I --

18 PRESIDING JUDGE: An application has been made and I will
19 deal with the application.

15:36:42

20 MR MUNYARD: All right.

21 MR KOUMJIAN: I actually meant to ask for a private session
22 at the beginning of day and I can deal with that at the same
23 time, but it is similar, so I can deal with that if I could.

15:37:00

24 PRESIDING JUDGE: I understand it is to deal only with this
25 problem, this matter here that has been raised.

26 MR KOUMJIAN: Yes. Well, very closely related.

27 PRESIDING JUDGE: Please put the Court in private session.
28 For the purposes of the members of the public, there are some
29 matters to do with witness security and so the next part of the

1 evidence will not be actually transmitted to the outside world.

2 MR MUNYARD: Madam President, Mr Taylor would like to be
3 excused for a moment.

4 PRESIDING JUDGE: Yes, please have him escorted out. Is he
15:37:31 5 all right?

6 MR MUNYARD: Yes.

7 MS IRURA: Your Honour, we are in private session.

8

9 [At this point in the proceedings, a portion of
10 the transcript, pages 6375 to 6383, was
11 extracted and sealed under separate cover, as
12 the proceeding was heard in private session.]

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1 [Open session]

2 MS IRURA: Your Honour, we are in open session.

3 PRESIDING JUDGE: I'm grateful. If you could now assist us
4 with the witness.

15:59:22 5 [In the presence of the witness]

6 Mr Witness, we thank you for your patience. The matter
7 didn't concern yourself and we are now going to proceed on with
8 your evidence. Mr Munyard, please proceed with your questions.

9 MR MUNYARD: Thank you, your Honour:

15:59:59 10 Q. Mr Mongor, you told us earlier that you had never been
11 shown anybody's witness statement or had any witness statement
12 read to you during the course of all of the interviews that you
13 had with the Office of the Prosecutor. Do you remember saying
14 that very firmly earlier today I think it was?

16:00:28 15 A. That I said it?

16 Q. Yes. And is that right, that you never had anybody else's
17 witness statement read to you or shown to you so you could read
18 it?

19 A. They did not read a statement to me to say that this is
16:00:53 20 this person's statement, that these are the things that this
21 person has been saying.

22 Q. Would you open the bundle, please, at tab 4. Do you have
23 tab 4 there?

24 A. Yes.

16:01:37 25 Q. Is that your interview on 1 October 2006?

26 A. Yes.

27 Q. I am going to ask you to look at the second point in the
28 body of that interview. Madam President, I don't require it at
29 the moment to be shown on the screen. I can read it out, which I

1 think might meet the concerns of some.

2 PRESIDING JUDGE: Yes, please do so, Mr Munyard.

3 MR MUNYARD:

16:02:19

4 Q. Do you see that second point where it has the name Kolot in
5 capital letters?

6 A. Yes.

16:02:47

7 Q. And this is what it reads: "Kolot reviewed with Mongor
8 another witness's statement summary for corroboration" and it
9 gives the witness's identity as TF1-151. So you were shown
10 another witness's statement, weren't you?

11 MR KOUMJIAN: That misstates what was just read. It does
12 not say shown.

13 PRESIDING JUDGE: In fairness it says --

14 MR MUNYARD: You are quite right and I will correct it:

16:03:00

15 Q. It says that this witness's statement summary was reviewed
16 with you. In other words, to use the expression you used this
17 morning, this witness's statement, or parts of it at any rate,
18 were read over to you?

16:03:36

19 A. Well, nobody told me that they were reading a witness's
20 statement to me or that this is the statement for somebody who
21 had testified or somebody who was coming to testify. I can't
22 recall that, that they made it clear to me that this is one of
23 our witness and this is what he has said.

16:04:08

24 Q. You see, the notes of this interview which lasted a full
25 three hours cover less than four pages, don't they? In fact if
26 you measure it they cover three pages if you take out the
27 headings. So I suggest, Mr Mongor, that quite a bit of time must
28 have been spent that day reviewing the witness statement summary
29 with you, going over what somebody else's account to the

1 Prosecution was. Now does that jog your memory that they asked
2 you about somebody else's account?

3 A. I don't think that is how the Prosecution operates, that
4 they will take somebody else's statement and then they will bring
16:05:11 5 it to me to read somebody else's statement to me.

6 Q. I'm going to stop you there.

7 PRESIDING JUDGE: Mr Witness, we are not asking you to
8 speculate as to how the Prosecution operates. You are asked a
9 straight question. Did you see the notes?

16:05:26 10 MR MUNYARD:

11 Q. Well, was the statement reviewed with you, whatever the
12 word reviewed means? Did the interviewer ask you to comment on,
13 because that's - ask you to confirm, I should say, because that's
14 what corroboration means. Did the interviewer ask you to confirm
16:05:50 15 anything that he was putting to you from another witness's
16 statement summary?

17 A. I can't recall that.

18 Q. Are you saying you can't recall it or you don't know what I
19 mean by that?

16:06:18 20 A. I understand what you are saying, but I can't recall it
21 now. The way the Prosecutor or the Prosecution did it, the thing
22 you are talking about.

23 Q. Well, let me make it clear. I'm not going to show you the
24 witness summary statement because I don't want to cause anyone
16:06:42 25 any concern, but it is 14 and a half pages of single spaced close
26 typing. So when it says it's a summary it's actually a summary
27 of a whole lot of statements given by that witness. It's a very
28 lengthy document that was reviewed with you, that's to say it
29 must have been gone through in some form, for your corroboration.

1 Do you know what corroboration means?

2 A. No, I want you to make it clear to me.

3 Q. Right. It means for you to confirm and support what is in
4 that other witness's statement that was being reviewed with you?

16:07:45 5 A. No, my Lord.

6 Q. So something was discussed with you about the contents of a
7 14 and a half page statement summary and it was discussed with
8 you for you to corroborate or support it. Does that ring any
9 bells?

16:08:17 10 A. Well, I don't know about what you are talking.

11 Q. You said a moment ago, and I am not going to invite you to
12 repeat it, but you said a moment ago that the Prosecution don't
13 work like that, they don't ask you to comment on other people's
14 statements. Just go back to what I have read out. Kolot, the
16:08:52 15 investigator, reviewed with you another witness's statement
16 summary for corroboration. It could not be clearer than that,
17 could it? He discussed with you the contents of another
18 witness's statement, didn't he?

19 A. I can't recall that now. I can't recall.

16:09:29 20 Q. All right. Well, let's just go to tab 17 for I hope the
21 last time today. If you would turn over the page in tab 17 to
22 the second page. Do you see box number 6, the second box down,
23 Friday 29 September 2006? Do you see that?

24 A. Yes, I can see it.

16:10:18 25 Q. Right. Sorry, we can work out from that that 1 October
26 must have been a Sunday as there are only 30 days in September.
27 So you were interviewed and in the course of that interview this
28 other witness's statement was reviewed with you for corroboration
29 by you on Sunday 1 October for three hours, but it doesn't appear

1 as though you were given any money at all on that day, unless
2 there is something missing in the documentation, for either
3 transport or meals or lost wages. Did you get paid every time
4 you went to see them?

16:11:23 5 A. Any time I went to see them, yes, they gave me money.

6 Q. Right. So there should be a receipt for 1 October? These
7 boxes are receipts. Do you follow? Do you agree that there
8 should be a receipt for that particular interview?

9 PRESIDING JUDGE: Are you assuming that they would be given
16:11:56 10 - paid the same day?

11 MR MUNYARD: I am assuming, Madam President, that they
12 would certainly be paid between the day of the interview and
13 nearly three months later which is the next box, box 7.

14 PRESIDING JUDGE: I only make the comment because in my
16:12:08 15 experience accountants aren't always that ready to deal with
16 things, but there's no harm in putting it to him.

17 MR MUNYARD: No:

18 Q. You say you were paid every time you went to see them. Did
19 you get the money on the day each time after each interview?

16:12:25 20 A. Yes, they gave me the money.

21 Q. Right. And the fact that it's a Sunday, well, we have
22 already seen on Sunday 3 September on the previous page - we have
23 seen that you got paid for transport, meals and lost wages. The
24 fact that it's a Sunday doesn't make any difference to you being
16:12:56 25 paid, does it, Mr Mongor?

26 A. Repeat.

27 Q. The fact that it is a Sunday doesn't mean that you wouldn't
28 be paid for attending an interview?

29 A. No.

1 Q. Thank you. I am not going to labour the point, but boxes 8
2 and 9 are also both Sundays for which you were paid for lost
3 wages on both of those days. Right.

4 Now I want to ask you about something else, please. When
16:13:45 5 do you say you got driven out of Sierra Leone, you when you were
6 fighting with the RUF? You invade in March of 1991, you're in
7 Koindu and how long are you in Sierra Leone from March 1991 until
8 you are driven over the border?

9 MR KOUMJIAN: I could be incorrect, your Honours, but
16:14:27 10 that's not my understanding, that the witness ever said he was
11 driven over the border. He did talk about being sent over the
12 border at one point, but I stand --

13 MR MUNYARD: I think Mr Koumjian may be correct. I might
14 be putting it a little imprecisely:

16:14:41 15 Q. You have told us that you were pushed almost to the border
16 with Liberia at one point by the NPRC, the National Provisional -
17 you fill in the rest if you would. I don't know if it's
18 reconstruction council or what, but general Strasser, Captain
19 Strasser - the national ruling - maybe it's redemption.

16:15:12 20 PRESIDING JUDGE: I think it was provisional. National
21 Provisional --

22 MR MUNYARD: Yes, I think you are right. National
23 Provisional Ruling Council.

24 THE WITNESS: Yes, they pushed us in 1993. They pushed us
16:15:29 25 to the border.

26 MR MUNYARD:

27 Q. Actually over the border?

28 A. We did not cross over.

29 Q. Were you ever with any group that was pushed out of Sierra

1 Leone - in any RUF group that was pushed out of Sierra Leone in
2 1991?

3 A. In 1991 they did not push us from Sierra Leone.

4 Q. All right. So you remain in Sierra Leone from March of
16:16:16 5 1991 until you are almost pushed out of the country in when in
6 1993?

7 A. It was in 1993, but I can't recall the month. It was in
8 1993 that we were pushed to the border.

9 Q. Early 1993, Mr Mongor?

16:16:56 10 A. It was not early. It was not early 1993.

11 Q. Not early. All right. And where were you? What border
12 position were you in? What was the nearest town or village?

13 A. Well, I was in the jungle.

14 Q. Yes, which part of the Sierra Leonean border were you
16:17:33 15 pushed to that you didn't actually cross over, but you were
16 pushed up to?

17 A. Well, when the men came they passed and went towards the
18 border. I took a bypass and then I went to my own village, a
19 village called Kangama. That was where we went and we set up a
16:18:05 20 defensive there and that is a main motor road.

21 Q. Yes, where is Kangama? What region? What district, I
22 should say?

23 A. It is in the Kailahun District.

24 Q. So you were near the border with Liberia?

16:18:30 25 A. Yes, from there to go to Liberia is not far.

26 Q. Yes.

27 A. You can even walk.

28 Q. And which Liberian county is on the other side of the
29 border?

1 A. Well, you have Lofa County.

2 Q. Thank you. And what was happening in Lofa County at the
3 time that your forces were pushed close to the border between
4 Sierra Leone and Lofa County?

16:19:16 5 A. Well, that was the time the ULIMO had occupied the Lofa
6 County.

7 Q. Yes. And what was the attitude of the RUF towards ULIMO at
8 that time?

9 A. Well, at that time the ULIMO were considered enemies to us.

16:20:02 10 Q. By that time the NPFL were considered certainly not friends
11 of yours, were they? They had all been expelled from Sierra
12 Leone, hadn't they?

13 PRESIDING JUDGE: You have actually got two questions
14 there, Mr Munyard. Could you put them one at a time, please.

16:20:28 15 MR MUNYARD: Yes, certainly:

16 Q. By that time the NPFL had all been expelled from Sierra
17 Leone, hadn't they?

18 A. They had recalled some of the NPFL to go back to Liberia.
19 That is those who were causing trouble.

16:20:53 20 Q. Mr Mongor, I suggest to you that the order from the senior
21 officers of the NPFL was that all NPFL soldiers were to be
22 withdrawn from Sierra Leone and this was by some time in 1992,
23 around the middle or so of 1992, and that is what happened, was
24 it not?

16:21:20 25 A. Yes, they withdrew them.

26 Q. Right. And this was because of these various operations
27 Top 20, Top 40 and Top Final?

28 A. Yes.

29 Q. There were serious problems between the NPFL and the RUF in

1 1992, would you agree?

2 A. Well, it was not a serious problem.

3 Q. Well, are you saying you personally were still in touch
4 with anybody in the NPFL in late 1992?

16:22:19 5 A. Inside that 1992, yes, I was personally in touch, because
6 at that time I was acting as battle group commander.

7 Q. Who were you in touch with in the RUF and when in 1992? I
8 am talking about mid to late 1992?

9 MR KOUMJIAN: Did counsel mean NPFL? He said RUF.

16:22:42 10 PRESIDING JUDGE: I was going to make the same remark.

11 MR MUNYARD: I'm sorry:

12 Q. I meant the NPFL?

13 A. The time I was acting as battle group commander?

14 Q. Who was it that you were in touch with in the NPFL and when
16:23:14 15 were you in touch with them during mid to late 1992?

16 A. I was in touch with Mr Taylor and I used to give him
17 updates of activities that were going on and the things that we
18 needed to carry on with our movement at the battle front.

19 Q. How were you in touch with Mr Taylor, you personally?

16:24:17 20 A. Well, I got in touch with Mr Taylor over the field radio,
21 because we had a field radio with us at that time and it was one
22 of his operators that he sent, that was with us, that was on that
23 particular radio. So that was the time that I made the request.

24 Q. So are you saying that you were communicating directly with
16:24:46 25 Mr Taylor while you were in the field?

26 A. I said I spoke with him at the time I was acting battle
27 group commander.

28 Q. Yes, but I am asking you: Are you saying you communicated
29 with him directly yourself?

1 A. Yes, I spoke. I communicated with him myself.

2 Q. How often did you do that while you were in the field?

3 A. No, I said I did it once and at that time I was acting
4 battle group commander. It was just once that I did that.

16:25:44 5 Q. And was that while you were in the field?

6 A. Yes, the time I was acting battle group commander. That
7 was the time.

8 Q. And are you able to help us a bit more specifically when in
9 mid to late 1992 was this?

16:26:29 10 A. Well, I can't give you specific dates now because it is
11 something that has taken - that happened a long time ago and I
12 cannot tell you that it was on this specific date that I did that
13 communication with him, but I did that before I handed over
14 office.

16:26:53 15 Q. Right.

16 PRESIDING JUDGE: Mr Munyard, I hope this is a convenient
17 time because we have been signaled that the tape had just about
18 run out, so I trust this is convenient for you.

19 MR MUNYARD: Can I answer that simply by saying I will
20 stop.

16:27:07

21 PRESIDING JUDGE: Thank you. Mr Witness, we are again
22 going to adjourn until tomorrow morning. I again remind you, as
23 I have done in the past, that you are under oath and you should
24 not discuss your evidence with anyone else. Do you understand?

16:27:25 25 THE WITNESS: Yes, my Lord.

26 [Whereupon the hearing adjourned at 4.30 p.m.
27 to be reconvened on Wednesday, 2 April 2008 at
28 9.30 a.m.]

29