



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

FRIDAY, 20 JUNE 2008
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr Simon Meisenberg
Ms Doreen Kiggundu

For the Registry:

Ms Rachel Irura

For the Prosecution:

Ms Brenda J Hollis
Mr Christopher Santora
Ms Maja Dimitrova

**For the accused Charles Ghankay
Taylor:**

Mr Terry Munyard
Mr Morris Anyah
Ms Megan Dorey

1 Friday, 20 June 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:29:25 5 PRESIDING JUDGE: Good morning. Appearances, please.

6 MR SANTORA: Good morning, Madam President. For the
7 Prosecution is lead counsel Brenda Hollis, Maja Dimitrova, and
8 myself Christopher Santora.

9 PRESIDING JUDGE: Thank you, Mr Santora. Mr Anyah?

09:29:41 10 MR ANYAH: Yes, good morning, Madam President. Good
11 morning, your Honours. For the Defence we have Mr Terry Munyard,
12 myself Morris Anyah, and Ms Megan Dorey.

13 PRESIDING JUDGE: Thank you. If there are no other matters
14 I will remind the witness of her oath. Madam Witness, you have
09:29:58 15 taken the oath to tell the truth. That oath is still binding on
16 you and you must answer questions truthfully. Do you understand?

17 THE WITNESS: Yes, ma'am.

18 WITNESS: TF1-584 [On former oath]

19 PRESIDING JUDGE: Proceed, Mr Anyah.

09:30:18 20 MR ANYAH: Thank you, Madam President. Good morning,
21 counsel:

22 CROSS-EXAMINATION BY MR ANYAH: [Continued]

23 Q. Good morning, Madam Witness. Madam Witness, when we left
24 off yesterday we were considering one of your statements to the
09:30:35 25 Office of the Prosecutor. For your Honours' recollection it's
26 the document in tab 4 and I was looking at paragraph 4 on page 1.
27 Madam Witness, when I put this paragraph to you, and indeed I
28 only read a sentence from it and I had promised to read the
29 entire paragraph, but the issue we were considering was whether

1 or not you were present at the same location from where Sam
2 Bockarie is said to have left to Foya at the time they returned
3 with the arms and ammunition. Do you remember that,
4 Madam Witness?

09:31:55 5 A. Yes.

6 Q. Let me read the entire paragraph, as I had promised you,
7 and it reads:

8 "With reference to paragraph 59 at page 10 (ERN 00044537)
9 the witness states that it was Sebatu who told her that the group
09:32:24 10 was going to Liberia on that occasion to collect arms and
11 ammunition. The witness states that when she arrived in Buedu
12 she saw Sam Bockarie and some of his men boarding truck and
13 leaving Buedu. Sebatu told the witness that they were heading to
14 Foya to collect ammunition. The witness was present when the
09:32:54 15 group returned after the trip and she saw the trucks loaded with
16 ammunition and Colonel Jungle returned with Sam Bockarie to
17 Buedu. The witness clarifies that the reference to Major Sellay
18 in the paragraph is that he had told her on various other
19 occasions that Sam Bockarie was receiving arms and ammunition
09:33:20 20 from Charles Taylor in Monrovia, but the information about that
21 particular trip, when the witness was in Buedu, was told to her
22 by Sebatu."

23 Now, Madam Witness, I had put it to you yesterday that you
24 were not present when Sam Bockarie initially arrived with the
09:33:46 25 arms and ammunition. Do you agree, Madam Witness?

26 A. I was present.

27 Q. Did they arrive or return back to the same house from which
28 they left when you saw them leaving?

29 A. Yes.

1 Q. Well, I looked up your transcript from yesterday. Counsel,
2 for your benefit, I will be referring to the exchange on page
3 12236, transcript of 19 June 2008, in particular lines 20 through
4 26. The question was posed to you by Mr Santora yesterday and it
09:34:54 5 was:

6 "Q. How long did it take Sam Bockarie after he left to
7 return?

8 A. It took him hours because it was after 12 o'clock
9 midday when they left and they returned before 5 o'clock.

09:35:15 10 Q. Who did he return with?

11 A. The moment they came with the vehicles, at that moment
12 I was not at the house when they disembarked on the
13 vehicles, but when we went to the zoebush it was when I saw
14 Colonel Jungle."

09:35:32 15 Madam Witness, do you remember giving that response to
16 questions by counsel opposite yesterday?

17 A. Yes.

18 Q. Are you now satisfied that you were not present at the same
19 house when Sam Bockarie returned from this trip to Foya?

09:35:58 20 A. I was not present at Sam Bockarie's house, but the house
21 where I was when I saw him going, I was at the same house when I
22 saw them returning.

23 Q. Then why did you say yesterday you were not at the house
24 when they disembarked?

09:36:16 25 A. I meant Sam Bockarie's house.

26 Q. The point is whether or not you were present when they came
27 and disembarked from their vehicles. Were you present,
28 Madam Witness, at the precise moment they returned and
29 disembarked?

1 A. I still was saying that I was at the house, the house where
2 my sister was where I lived when - where I stayed when I went. I
3 was at that same house and from that house I could see Sam
4 Bockarie's house and I saw them return, just as I saw them going.

09:36:53 5 Q. So in this paragraph 4, and considering it in the context
6 of your first statement to the Prosecution in October last year,
7 and we covered that, it's the paragraph 59 in tab 1, in this
8 paragraph in your statement in May you claimed to have been
9 present when Sam Bockarie left to obtain these arms and
09:37:28 10 ammunition, yes?

11 A. Yes.

12 Q. You claim to have been --

13 MR SANTORA: Just for reference, you referred to paragraph
14 59 and then tab - just where are we exactly, I'm sorry?

09:37:47 15 MR ANYAH: That's fine, counsel. You will notice that the
16 statement in tab 4 refers to her prior statement in tab 1,
17 paragraph 59 of that statement.

18 MR SANTORA: I just want to make sure the witness was on
19 the right section as well. Okay, thank you.

09:38:04 20 MR ANYAH:

21 Q. Madam Witness, if at any time you are not following me, or
22 you are not at the page where I am, just let me know, okay?

23 A. Okay.

24 Q. Now, paragraph 4 in your statement of 23 May through 24,
09:38:22 25 2008, you claim to have been present and saw Sam Bockarie when
26 they boarded their trucks and headed for Foya, correct?

27 A. Yes.

28 Q. You claim to have known they were going to Foya on the
29 basis of what Sebatu told you, yes?

1 A. Yes.

2 Q. You say in court today that you were present when they
3 returned with the arms and ammunition, yes?

4 A. Yes.

09:38:52 5 Q. And you say in court that Colonel Jungle returned with
6 them, yes?

7 A. I did not say that Colonel Jungle told me that.

8 Q. You say in court when Sam Bockarie returned that was the
9 time you saw Colonel Jungle, true?

09:39:15 10 A. Yes.

11 Q. But in your first statement to the Prosecution five months
12 before, in paragraph 59 you said that you went to Buedu with
13 Superman for a meeting, yes?

14 A. Yes.

09:39:38 15 Q. You spoke of carrying arms and ammunition back from Buedu
16 to Superman Ground, yes?

17 A. Yes.

18 Q. But you did not say you saw Sam Bockarie going to Foya,
19 right?

09:40:02 20 A. Yes.

21 Q. You did not say that on that occasion you saw Colonel
22 Jungle, correct?

23 A. It was not stated there.

24 Q. Indeed you said you believed that the arms and ammunitions
09:40:25 25 came from Monrovia and Charles Taylor because of what you had
26 heard from Major Sellay and what you had heard over the radio
27 regarding Issa Sesay and Fonti Kanu, yes?

28 A. Yes.

29 Q. This Major Sellay, did he have another name, Madam Witness?

1 A. I knew that name for him.

2 Q. This fellow Jungle, did he have another name,
3 Madam Witness?

4 A. I only knew him for Jungle.

09:41:08 5 Q. Have you heard the name Duwoh before, D-U-W-O-H?

6 A. That was Sellay's surname.

7 Q. And have you heard the name Daniel Tamba before?

8 A. No.

9 Q. Do you know what nationality Sellay is, or was?

09:41:40 10 A. Yes.

11 Q. What was his nationality?

12 A. Liberian.

13 Q. And do you know what nationality Jungle was?

14 A. I never asked him about his nationality.

09:42:02 15 Q. Did you speak to Jungle at any time?

16 A. No.

17 Q. This meeting in Buedu that you accompanied Superman for or
18 you accompanied Superman to was about Issa Sesay and diamonds,
19 yes?

09:42:24 20 A. Yes.

21 Q. Was the meeting held at a place close to the Waterworks?

22 A. Yes.

23 Q. Indeed, is the vicinity of where the meeting was held
24 called Waterworks?

09:42:44 25 A. I did not go there. That was what they said. They said
26 they held it there.

27 Q. Indeed you told us you did not attend the meeting, right?

28 A. Yes.

29 Q. So as you sit there now you don't know if Jungle was

1 present at this meeting, do you?

2 A. I wouldn't know because I did not go there.

3 Q. Sallay was a radio operator, right?

4 A. He was the commander for the radio stations in Buedu.

09:43:32 5 Q. He died in Foya, right?

6 A. Yes.

7 Q. Do you know when he died?

8 A. I can't recall the month.

9 Q. Let me read to you what another witness has said before
09:43:53 10 this Court about both Sallay and Jungle and I'll ask you a few
11 questions. For counsel's benefit the transcript in question is
12 from 8 April 2008, the witness is witness TF1-516 and I will
13 start on page 6913, line 25. I think Madam Court Officer might
14 be able to pull it up for everyone's benefit.

09:44:42 15 Madam Witness, somebody appeared before this Chamber on 8
16 April 2008 and I will try and ascertain whether I can mention the
17 name in a minute, but for now we'll just call the person TF1-516.
18 At line 25 on the transcript of that day, page 6913 - yes, the
19 person testified with a pseudonym. The person said this,
09:45:22 20 Madam Witness. The question was:

21 "Q. You mentioned also the name of somebody, Sallay?

22 A. Sallay Duwor", spelt D-U-W-O-R and then the witness
23 spells it. Then on line 29 there is the question:

24 "Q. Now, who sent Sallay Duwor to Sam Bockarie? You said
09:45:54 25 he was sent to Sam Bockarie at one point?

26 A. He came from Liberia. He was just a Liberian.

27 Q. Yes, but, you know, how did he come to Sam Bockarie?

28 A. During the time the ULIMO-K had cut off, they cut off
29 the link between the RUF and the NPFL, Sallay Duwor

1 together with Jungle were left in a cut off in the jungle
2 around Foya, so when ECOMOG came to disarm the NPFL and the
3 ULIMO-K fighters they crossed into Sierra Leone and stayed
4 with Sam Bockarie."

09:46:49 5 Then later on on the next page which is - on the same page,
6 6914, it goes on to say that, "Jungle was a man called Daniel
7 Tamba, alias Jungle", and then on the next page, 6915, there's
8 the question posed at line 7:

9 "Q. Which group did jungle belong to?

09:47:19 10 A. To the NPFL."

11 Then at line 9 there is the question - I wonder if counsel
12 are having difficulty?

13 MR SANTORA: Your Honour, it's actually just one point,
14 because my screen is showing the statement still and I believe
09:47:39 15 that the witness is not following along because she's looking at
16 the screen and it's showing a statement.

17 MS IRURA: Your Honour, the broadcast screen next to the
18 witness is showing her the transcript. I'm publishing it from my
19 location.

09:47:53 20 MR SANTORA: Okay, I apologise.

21 MS IRURA: Please press PC1 on your --

22 MR SANTORA: Okay, thank you.

23 MR ANYAH: May I proceed, Madam President?

24 PRESIDING JUDGE: Yes, please do so.

09:48:07 25 MR ANYAH:

26 Q. On page 6915 the question in line 7 is posed:

27 "Q. Which group did Jungle belong to?

28 A. To the NPFL."

29 Then line 9 a question:

1 "Q. And do you recall what time he moved over to Sierra
2 Leone along with Sallay?

3 A. When disarmament started in Liberia. In fact, at that
4 time we had the ULIMO-K fighters crossing to Liberia with
09:48:36 5 arms and ammunitions. They were selling weapons and
6 ammunitions to Sam Bockarie and the message was transmitted
7 to One One X-ray, that was in Abidjan to Corporal Sankoh at
8 the time he was then. Then he sent money with one radio
9 operator called Cat, Martin Moinama."

09:49:03 10 Madam Witness, you know Martin Moinama, right?

11 A. Yes.

12 Q. You mentioned him yesterday as being one of those who was
13 released from Pademba Road Prison when the 6 January invasion
14 took place, correct?

09:49:16 15 A. Yes.

16 THE INTERPRETER: Your Honours, can the witness's mic be
17 reactivated.

18 PRESIDING JUDGE: Proceed, Mr Anyah.

19 MR ANYAH: Yes:

09:49:35 20 Q. Madam Witness, and the 6 January invasion we're speaking of
21 it's in 1999, correct?

22 A. Yes.

23 Q. Now do you know what ULIMO stands for, Madam Witness?

24 A. I don't know what ULIMO stands for exactly.

09:50:01 25 Q. But you know - you have heard of the name ULIMO before?

26 A. Yes.

27 Q. Does it sound like ULIMO stands for United Liberation
28 Movement for Democracy in Liberia?

29 A. I cannot tell you because I never asked what it stood for.

1 I only knew it to be ULIMO.

2 Q. Well I see that I made a mistake as well and so I should
3 try again, but you said - you already answered the question and
4 you said you do not understand it, or you do not know exactly
09:50:50 5 what it stands for, but you know ULIMO occupied the
6 Liberian-Sierra Leonean border from 1993 onwards, correct?

7 A. Yes.

8 Q. Indeed when you were in Kolahun ULIMO had already started
9 attacking Liberia and this was in 1993, yes?

09:51:13 10 A. Yes.

11 Q. Do you agree with what this witness I've just read,
12 TF1-516, says about the RUF purchasing arms, or as it's said in
13 the transcript weapons and ammunitions, from ULIMO-K?

14 A. I would not agree, because at the time they were in Buedu
09:51:45 15 what they were transacting, whether it was with ULIMO or anybody
16 else, I did not learn that either by message or any form of
17 information. I was not there. What the person saw, maybe that
18 was what the person said.

19 Q. Are you sure of that, Madam Witness?

09:52:05 20 A. Yes.

21 Q. You do not know of the RUF and ULIMO engaging in
22 transactions for arms and ammunition. Is that your evidence,
23 Madam Witness?

24 A. What that witness said is what I am talking about.

09:52:27 25 Q. Well, do you know of the RUF engaging in transactions for
26 arms and ammunitions from ULIMO?

27 A. Yes, at a certain point.

28 Q. Indeed in your statement you told the Prosecution - and I'm
29 referring to a statement in tab 1, page 28, paragraph 164. You

1 told the Prosecution, Madam Witness, in paragraph 164, it reads:

2 "The witness knows that ULIMO was selling or trading
3 weapons to the RUF. They would trade wrist watches for weapons.
4 ULIMO had been burying them in the ground."

09:53:50 5 Do you remember telling the Prosecution that,
6 Madam Witness?

7 A. Yes.

8 Q. That is consistent with what TF1-516 said, would you agree,
9 Madam Witness?

09:54:10 10 A. It could be in line, because the person said it the way the
11 person knew it. I heard about it. I did not see it happen, but
12 I heard about it at a certain point.

13 Q. So you do make the distinction between what you heard and
14 what you saw yourself, right?

09:54:31 15 A. Yes.

16 Q. When you spoke to us on Wednesday about diamond mining in
17 Kono, that is civilians being used to mine for diamonds in Kono,
18 you said you saw it, right?

19 A. Yes.

09:54:49 20 Q. You said you saw it yourself, correct?

21 A. Yes.

22 Q. But that's not what you told the Prosecution when you first
23 met with them. Do you remember saying something different,
24 Madam Witness?

09:55:06 25 A. How?

26 Q. Do you remember saying you never saw it, you only heard
27 about it, when you spoke with them in October last?

28 A. No.

29 Q. Do you wish to be reminded of what you said to them when

1 you spoke with them last October?

2 A. Yes.

3 MR ANYAH: Madam Court Officer, could we stay on the same
4 tab, tab 1, page 7, paragraph 39:

09:56:09 5 Q. Paragraph 39, tab 1, this is what you told them about
6 diamond mining in Kono when you met with them for six/seven days
7 last October:

8 "The witness knew about the mining going on in the area,
9 but did not participate in it. Morris Kallon was one of the
09:56:27 10 mining commanders in Kono at that time. He was based in Kono.
11 He had bodyguards assigned to watch certain areas. They also
12 watched the civilian miners to make sure they worked and did not
13 steal diamonds. She did not witness this, just heard about it.
14 It was common knowledge."

09:56:59 15 Did you tell them this last October about diamond mining in
16 Kono, Madam Witness?

17 A. Yes, I spoke about diamond mining and the question that was
18 asked of me about the mining that Morris Kallon oversaw - and I
19 did not go there where he was overseeing mining. I answered the
09:57:23 20 questions that were asked of me.

21 Q. But you understand that this paragraph relates to the
22 mining of diamond by civilians, yes?

23 A. Yes.

24 Q. And you see the first sentence that suggests that you told
09:57:53 25 them you knew about mining going on in the area, but you did not
26 participate in it, yes?

27 A. Yes.

28 Q. Are you saying that you understood their questioning to be
29 limited to only the issue of whether or not you saw Morris Kallon

1 supervising mining operations?

2 A. The question was if I saw where this mining was going on,
3 the mining that was supervised by Morris Kallon. I did not go to
4 the site. I did not see that. I saw some other sites where
09:58:30 5 civilians were mining, but I did not see where Morris Kallon's
6 pit was, where the mining - where his mining was going on.

7 Q. That's fair enough. Madam Witness, do you agree that
8 ULIMO-K cut off the border between Liberia and Sierra Leone
9 between 1993 and 1996?

09:59:07 10 A. I know of 1993 and in '96 I was not around that area.

11 Q. Are you aware that other witnesses have come before this
12 Court who have said that ULIMO-K cut off the border and the
13 communication lines between the RUF and Liberia between 1993 and
14 1996?

09:59:42 15 A. I have never discussed with any witness who has testified
16 here.

17 Q. Do you know how it came to be that Jungle came to Sierra
18 Leone?

19 A. I don't know.

10:00:03 20 Q. Do you know whether Jungle was cut off from Liberia and
21 remained in Sierra Leone because of ULIMO-K at the border?

22 A. I did not know that.

23 Q. Have you ever heard an account of events similar to what I
24 just read you that was said by TF1-516, to the effect that Jungle
10:00:30 25 and this fellow Sellay Duwoh were cut off from Liberia because
26 ULIMO-K had occupied the border between Liberia and Sierra Leone?

27 A. No.

28 Q. This fellow Martin Moinama, you said he was released by the
29 RUF from Pademba Road Prison in January 1999, yes?

1 A. Yes.

2 Q. Are you aware that Foday Sankoh was tried for treason,
3 convicted and sentenced to death in October of 1998?

4 A. Yes.

10:01:21 5 Q. Are you aware that Martin Moinama testified against Foday
6 Sankoh during that trial?

7 A. Yes.

8 Q. Are you aware that other witnesses have come before this
9 Court who have said that because he testified against Foday

10:01:47 10 Sankoh, Martin Moinama is believed to have been killed?

11 A. I am not aware that a witness came here and - just like I
12 said, I have never discussed with any witness to know what that
13 witness might have said in court, or that I knew that because
14 Martin testified in that court he was imprisoned, he was at

10:02:11 15 Pademba Road, he was just not killed at that moment.

16 Q. Are you saying that he was imprisoned at Pademba Road after
17 he testified against Foday Sankoh?

18 A. Yes.

19 Q. Are you aware that Foday Sankoh was also at Pademba Road at
10:02:30 20 the time?

21 A. Yes.

22 Q. So your evidence would be that both Foday Sankoh and Martin
23 Moinama were at Pademba Road about the same time?

24 A. I wouldn't know if it was about the same time that they
10:02:51 25 were imprisoned.

26 Q. Have you ever heard the name of Alhaji Conteh, also known
27 as Black Jesus?

28 A. I knew Black Jesus, but I didn't know that he was also
29 called Alhaji Conteh.

1 Q. Black Jesus was also imprisoned at Pademba Road, yes?

2 A. I don't know.

3 Q. Well, how do you know Black Jesus?

4 A. I knew him, but I never knew that he was at Pademba Road

10:03:36 5 because they never gave me a list that these are the names of

6 people who had been sent at Pademba Road. If I know about

7 Martin, it was because he was my colleague operator.

8 Q. Do you know where Martin Moinama is today, Madam Witness?

9 A. I don't know if he is alive. I heard that he died.

10:04:00 10 Q. Who told you he died?

11 A. The men who were in Freetown.

12 Q. Did you hear that from Foday Lansana, Madam Witness?

13 A. No. Foday Lansana did not go to Freetown.

14 Q. Well, let me ask you this: You said you heard it from the

10:04:31 15 men in Freetown, when exactly did you hear it from the men in

16 Freetown?

17 A. Yams Farm.

18 Q. And were you at Yams Farm about the time of the 6 January

19 invasion?

10:04:56 20 A. I was in Lunsar, but I went to Yams Farm after 6 January.

21 Q. So you heard after 6 January that the same Martin Moinama

22 who had been released from Pademba Road Prison had been killed.

23 PRESIDING JUDGE: I think the witness said died. That, to

24 me, includes natural causes.

10:05:24 25 MR ANYAH:

26 Q. Madam Witness, did you hear whether or not Martin Moinama

27 had been killed?

28 A. Yes.

29 Q. What exactly did you hear?

1 A. Lately I understood that Martin was killed because of the
2 testimony that he gave against Pa Sankoh and I cannot say that I
3 asked anybody who killed him or not. No, I did not ask that.
4 But the person who told me also told me that it was Sam Bockarie
10:06:12 5 who ordered his killing.

6 Q. So if your sequence of events is correct, they released him
7 from Pademba Road Prison and, if this rumour you heard is
8 correct, at the request of Sam Bockarie he was killed, yes?

9 A. Yes, according to what the person told me.

10:06:46 10 MR ANYAH: Madam Court Officer, can we go to page 29 of tab
11 1. The relevant paragraph is 172:

12 Q. Madam Witness, this is what you told the Prosecution about
13 Martin Moinama, October last when you met with them. The
14 paragraph reads:

10:07:36 15 "The witness has heard of Martin Moinama, also known as
16 the Cat, and he is late. The witness believes that he was killed
17 before the intervention. During the Freetown invasion the
18 witness did not hear any radio message about the Cat."

19 Madam Witness, why do they have you telling them that
10:08:06 20 Martin Moinama was killed before the intervention?

21 A. I can answer to that. The question was if I knew Martin
22 and I knew him, and again they asked me when did I know that he
23 was missing and I knew when he got missing and that was at the
24 time when the ECOMOG took over Freetown and his wife stayed with
10:08:37 25 us and she told us that Issa arrested her husband and she was
26 sure that he had been killed. That was what exactly I said. And
27 I did not get any radio message about Martin, that he was taken
28 to Pademba Road or not. I learned that from his wife, that he
29 had died, because she herself did not see her [sic] after that

1 time, but later I learned that he died after 6 January.

2 Q. Madam Witness, you are now telling us Martin Moinama's wife
3 stayed with you, yes?

4 A. Yes.

10:09:32 5 Q. She stayed with you and she told you what had happened to
6 her husband, correct?

7 A. Yes.

8 Q. Indeed your answer just given in court - this is a
9 reference to what you believed the Prosecution was asking you in
10:09:51 10 October last, you said:

11 "They asked me when did I know that he was missing and I
12 knew when he got missing and that was at the time when the ECOMOG
13 took over Freetown and his wife stayed with us and she told us
14 that Issa arrested her husband and she was sure that he had been
10:10:15 15 killed."

16 This is what you've just said in court, yes?

17 A. Yes.

18 Q. When the ECOMOG took over Freetown, you're referring to the
19 intervention in February 1998, correct?

10:10:31 20 A. Yes.

21 Q. Moinama's wife was staying with you at that time. She told
22 you her husband had been killed, correct?

23 A. Yes.

24 Q. Then why are you telling us in court that during the 6
10:10:47 25 January invasion in 1999 Martin Moinama was one of those released
26 from Pademba Road Prison by the RUF invading forces?

27 A. I have said it here that the people who released those
28 people from Pademba Road and when they came back from Freetown it
29 was from them that I learnt that Martin had been killed, but I

1 never heard any radio message about Martin's release or his death
2 from any other person.

3 PRESIDING JUDGE: Just before you proceed, Mr Anyah, I note
4 that at page 19, line 18, it says "... because she herself did
10:11:44 5 not see her after that time." Possibly it doesn't read - "her"
6 doesn't sound correct to me.

7 MR ANYAH: I understand what your Honour means:

8 Q. Madam Witness, when you were saying that you learnt from
9 his wife that he had died because she herself did not see her,
10:12:14 10 you meant she herself, that's Moinama's wife, did not see him
11 after that time, correct?

12 A. Yes.

13 Q. Martin Moinama went to Abidjan with Foday Sankoh, yes?

14 A. Yes.

10:12:39 15 Q. At this time you were at Kangari Hills, yes?

16 A. Yes. I was at Kangari Hills, around Black Water.

17 Q. From Kangari Hills you moved to Black Water, right?

18 A. Yes.

19 Q. And you spoke of a distinction between two Black Waters,
10:13:10 20 the first one where you were at before the ECOMOG attacked, yes?

21 MR SANTORA: Objection. I mean it's subtle, but the
22 evidence was not that ECOMOG attacked them at Black Water.

23 MR ANYAH: May I finish my question. There was Kamajors
24 and ECOMOG, there are two Black Waters, same vicinity, at least
10:13:36 25 that's my recollection, but the witness can clarify.

26 MR SANTORA: Okay. Well, I guess what I'm saying is that
27 counsel stated that the evidence was that the first location at
28 Black Water was attacked by ECOMOG and that is not the evidence
29 that the witness gave.

1 MR ANYAH: With respect, I have put propositions to this
2 witness on occasion and she has corrected me.

3 PRESIDING JUDGE: Mr Anyah, what you said was, "The first
4 one where you were at before the ECOMOG attacked, yes?",
10:14:07 5 apparently inviting an answer, but it's not apparent where
6 exactly ECOMOG attacked. It could have been any number of places
7 and in order - so maybe a little clearer in that question,
8 please.

9 MR ANYAH: Yes, Madam President. Yes:

10:14:23 10 Q. Madam Witness, from Kangari Hills you went to Black Water,
11 yes?

12 A. Yes.

13 Q. And you told us of an attack on your location in the
14 vicinity of Black Water on the day of the signing of the Abidjan

10:14:43 15 Peace Accord, 30 November 1996, by the Kamajors, yes?

16 A. Yes.

17 Q. Now before that attack by the Kamajors, earlier in 1996 had
18 your group been attacked in Black Water by ECOMOG jets?

19 A. I did not know whether they were ECOMOG jets, but I knew
10:15:09 20 that we were attacked by South Africans.

21 Q. Well, that's the Executive Outcomes. I'm not talking of
22 the Executive Outcomes. You told us about that in court. I'm
23 asking you if you remember whether or not your group before 30
24 November 1996 were attacked at Black Water by ECOMOG jets?

10:15:37 25 A. I am still accepting the attack, but I did not know whether
26 they were ECOMOG jets because I did not see anything written on
27 them, or whether I was told by somebody who said they were ECOMOG
28 jets, but I knew that we were attacked by South Africans.

29 Q. Were you attacked by South Africans, or did you attack the

1 South Africans and suffer a defeat?

2 A. I stated that we first attacked the South Africans at
3 Matotoka. After that, the South Africans came to our base.

4 Q. I'm sorry, Madam Witness, have you finished?

10:16:39 5 A. For the question you asked me, yes.

6 Q. Well, in any event --

7 PRESIDING JUDGE: Madam Witness, counsel also asked you
8 were you defeated by the South Africans, didn't you, counsel?

9 MR ANYAH: Yes, in conjunction to their group attacking the
10:17:02 10 South Africans.

11 PRESIDING JUDGE: So, it goes further than the South
12 Africans coming to your base.

13 THE WITNESS: Yes, the attack that we went on to Matotoka,
14 we did not succeed in that attack.

10:17:25 15 MR ANYAH:

16 Q. In any event, Madam Witness, this Abidjan Peace Accord was
17 the second peace agreement signed in 1996, correct?

18 A. I'm taking it that it's the first one that I knew of.

19 Q. Well, let me rephrase the question. There was a first
10:17:48 20 ceasefire agreement in the early part of '96 between Julius Maada
21 Bio and Foday Sankoh on the basis of what you told us on direct
22 examination, yes?

23 A. Yes.

24 Q. And you will agree with me, would you not, that Maada Bio
10:18:13 25 was in power in Sierra Leone from 16 January 1996 through 29
26 March 1996, yes?

27 A. Yes.

28 Q. And it was during this period of time when you monitored
29 Sierra Leonean government radio communications and told Foday

1 Sankoh about it, yes?

2 A. Yes.

3 Q. And you set up a telephone - sorry, a radio conference of
4 sorts for the following day between Foday Sankoh and the then
10:18:49 5 President of Sierra Leone, yes?

6 A. Yes.

7 Q. It took 24 hours for you to get the President of Sierra
8 Leone on the radio at a particular time to speak to Foday Sankoh,
9 yes?

10:19:07 10 A. Yes.

11 Q. Did you hear Maada Bio speak with Sankoh?

12 A. Yes.

13 Q. And what did they talk about?

14 A. Like I said, they talked about the war, how the fighting
10:19:31 15 was going on and they as brothers in Sierra Leone were fighting
16 against each other. They should stop the fighting and they
17 should make peace in Sierra Leone because it was a Sierra Leonean
18 problem. They should not go outside to talk peace.

19 Q. Did the RUF maintain that ceasefire agreement,
10:20:04 20 Madam Witness?

21 A. Yes.

22 Q. And that same year there was elections electing President
23 Kabbah into office, yes?

24 A. Yes.

10:20:20 25 Q. But you mentioned something called Operation Stop Election,
26 yes?

27 A. Yes.

28 Q. Who was that ordered by, Madam Witness?

29 A. It was a message that came from the Zogoda station where CO

1 Mohamed was. It came from Foday Sankoh through CO Mohamed to the
2 stations that were on the front lines, but it was the Zogoda
3 station that transmitted the message to me.

10:21:08 4 Q. And you said it came about because Foday Sankoh wanted
5 peace before elections while the population in Sierra Leone
6 wanted elections before peace, yes?

7 A. Yes.

8 Q. How did you know what the population in Sierra Leone wanted
9 at that time?

10:21:28 10 A. Like I said, I monitored when the call came in and it was
11 over the media and we got the information from the SLAs who were
12 living with the civilians in the town, towns that were not under
13 RUF control, that the civilians together with the SLPP wanted
14 election before peace.

10:22:08 15 Q. But despite this attempt to stop the election the election
16 went ahead as planned, right?

17 A. I can't say as planned, but I knew that election went on.

18 Q. And Kabbah was elected, yes?

19 A. Yes.

10:22:35 20 Q. Shortly after the election though the same Foday Sankoh
21 signed the Abidjan peace agreement on 30 November 1996, correct?

22 A. Yes.

23 Q. And indeed he moved to Abidjan with a delegation as early
24 as mid-year, May/June, 1996, correct?

10:23:05 25 A. I can't recall the month, but I know that he went with a
26 delegation to Ivory Coast.

27 Q. It was a number of months before November 1996, would you
28 agree?

29 A. Yes.

1 Q. Do you remember what month the elections were in 1996?

2 A. I can't remember the exact month.

3 Q. But Foday Sankoh was not in Sierra Leone when the elections
4 took place, would you agree?

10:23:43 5 A. Yes.

6 Q. So there he was in Abidjan with a delegation working
7 towards the Abidjan Peace Accord and your evidence is that he was
8 at the same time ordering the NPFL - sorry, the RUF members to
9 stop the election?

10:24:03 10 A. Like I said, Foday Sankoh had his station in Ivory Coast.
11 The message came from Zogoda, but the front column was from him.
12 I can't say that I did not monitor him sending the message, but I
13 got the message from the Zogoda station and it was from him
14 through CO Mohamed.

10:24:36 15 Q. 30 November 1996 the Kamajors attack your location at Black
16 Water and it would be fair to say at that time, Madam Witness,
17 that you and your RUF members were on the run for several months,
18 yes?

19 A. Yes.

10:24:57 20 Q. In fact as late as the AFRC coup, 25 May 1997, you did not
21 have a radio during that period of time when you were on the run,
22 right?

23 A. We had a radio, but we were not switching it on.

24 Q. The radio you had was not working though, true?

10:25:28 25 A. Yes, but it was not just at the beginning when we started
26 running away. There came a time when we lost some things which
27 made us not to be switching on the radio just like that.

28 Q. I'm trying to establish whether or not you had access to a
29 radio from November of 1996 through the junta period, 25 May

1 1997, and the answer is you did not have access to a radio, as in
2 one that you could use, correct?

3 A. From November I said that we did not have access to a radio
4 at the time that we were on the run, but not in November on the
10:26:27 5 day that the Kamajors attacked. We still had radio that we used
6 to switch on. But as we were running away we lost things that
7 caused us not to continue switching on the set.

8 Q. We'll come back to that because I have a paragraph to put
9 to you about what you said to the Prosecution before, but this is
10:26:55 10 1996 and the fact remains that everywhere - the Western Area was
11 scattered when the Kamajors attacked, all of you were on the run
12 and you heard about the AFRC coup over a transistor radio,
13 correct?

14 A. Like I said, I was on the run trying to come back to the
10:27:26 15 base. I met people who were ahead of me jubilating that it had
16 been announced that the AFRC had taken over and they were calling
17 the RUF to join them. That was my statement.

18 MR ANYAH: Madam Court Officer, can we show the witness tab
19 1, page 6:

10:28:21 20 Q. Madam Witness, the last paragraph, paragraph 34, has you
21 giving an account of what happened around the time of the Abidjan
22 Peace Accord when you were in Black Water and attacked by the
23 Kamajors and it reads:

24 "The witness also remembered that on the day the peace
10:28:45 25 accord was signed, 30 November, 'Black Water' was attacked by
26 Kamajors. Everyone scattered in the bush. The witness and other
27 fighters remained in the bush around Matotoka area on a long run
28 from the Kamajors for many months. The Western Area was in
29 disarray. She kept the radio, but it did not work. The witness

1 finally heard about the AFRC coup on a transistor radio and she
2 met up with others in the area of Five Mile."

3 Did you tell them that last October, Madam Witness?

10:29:39

4 A. Like I responded, that was what I told them and I strictly
5 said that I met people jubilating. According to their statement,
6 they said they heard the news from the media that AFRC had taken
7 over and that they were calling the RUF. So if I say on the
8 media, that was what I said.

10:30:10

9 Q. Well, this is 1996. You first learned to use a radio for
10 communication purposes, on behalf of the RUF, in late 1993 while
11 you were in Giema, correct?

12 A. I left Taidu in 1993, on Christmas Day, to go to Giema and
13 it was in '94 that I started radio training.

10:30:41

14 Q. Yes, you told us on 25 December. When you left Taidu did
15 you arrive in Giema on the same day?

16 A. No.

17 Q. You arrived in Giema in January of 1994, yes?

18 A. Yes.

10:31:01

19 Q. So Madam Witness, it's fair to say that from the day of
20 your capture by the NPFL, 21 April 1991, until January 1994 you
21 did not operate a radio for communication purposes on the behalf
22 of the RUF?

23 A. No.

10:31:30

24 Q. No means what? Did you or did you not operate a radio
25 during that close to three year period?

26 A. I did not operate a radio.

27 Q. And 1994 you received training at Giema at the hands of
28 Foday Lansana, yes?

29 A. Yes.

1 Q. And you became a full fledged radio operator only at the
2 time you went to Kangari Hills, yes?

3 A. Yes.

4 Q. And we just went through when you went to Kangari Hills.

10:32:18 5 You were there up through 1996, yes?

6 A. No.

7 Q. Well, what year did you leave Kangari Hills?

8 A. '95.

9 Q. And then comes 30 November '96 and you and your group

10:32:43 10 scatter again, yes?

11 A. Yes.

12 Q. And in between your stay at Kangari Hills and the time you

13 went to Black Water you had a baby, what you call being a

14 suckling mother, right?

10:33:08 15 A. Yes.

16 Q. And at that time you were not functioning fully - I mean as

17 in full-time - as a radio operator, correct?

18 A. Yes.

19 Q. "Yes" means you were part-time in the context of radio

10:33:25 20 operations, right?

21 A. I was operating. If I say part-time it could be that it

22 was from my house where the set was and that was where the

23 operators went. I was to sit on the radio for the rest of the

24 day. I would not - I was not doing it that way, but I was still

10:33:52 25 operating.

26 Q. During the time of the intervention, that's May of 1997 --

27 MR SANTORA: Objection. I'm sure it was just a

28 misstatement, but I mean I don't think --

29 MR ANYAH: I understand what you mean. I said

1 intervention. AFRC coup. I understand:

2 Q. Madam Witness, during the time of the junta period,
3 starting in May of 1997, you were in Gaya, right?

4 A. Yes.

10:34:45 5 Q. And who were you reporting to in Gaya at that time?

6 A. From Foday Lansana, my own commander that I was still with
7 from the north, who was Colonel Isaac, he was heading us in Gaya
8 from the north and, like I said, I was at the SLA's station. It
9 was only when I received a message that related to us, or that

10:35:24 10 was meant to be sent to any of our stations. I was not making
11 any special report to send to any commander at that time.

12 Q. That's what I was getting at, Madam Witness. Your function
13 as a radio operator in Gaya was limited to what you would call
14 just monitoring, right?

10:35:49 15 A. Yes.

16 Q. And that was the period of time you said you would go into
17 the radio stations where the SLA radio operators were, is that
18 correct?

19 A. Yes.

10:36:03 20 Q. Where did you go to after Gaya, Madam Witness?

21 A. I went to Kabala, on to Makeni.

22 Q. Between Kabala and Makeni you went to - is it Kayima, or
23 was that Kabala?

24 A. I went through Kayima to go to Kabala.

10:36:45 25 Q. And you went to Makeni to join the RUF/AFRC forces that
26 were retreating from Freetown, yes?

27 A. Yes.

28 Q. And all of you were headed for Kono, right?

29 A. Yes.

1 Q. And you recaptured Koi du from the Kamajors, right?

2 A. Yes.

3 Q. And then from then you all went to Kailahun, correct?

4 A. No.

10:37:33 5 Q. Did you stay in Koi du?

6 A. Yes, I was in Koi du.

7 Q. At that time you did not have a radio, would that be fair
8 to say, Madam Witness?

9 A. There was a radio, but, like I said again, I was not
10 sitting on the radio set for the rest of the day. Sometimes I
11 would only go there once and enter the radio station and then
12 come out.

13 Q. Did you tell the Prosecution that at this particular time
14 when you were in Koi du you did not have a radio set?

10:38:21 15 A. Koi du or Koi ndu?

16 Q. Well, I have it here as Koi du, K-O-I -D-U.

17 A. I hadn't a radio set at my house, but we had a radio.

18 Q. Then why did you tell the Prosecution in paragraph 45, tab
19 1, "The witness did not have a radio set at that time"?

10:38:53 20 A. You too would say that "the witness" and refer to me, but I
21 hadn't a radio, but the movement had a radio, but I hadn't a set
22 at that time.

23 MR ANYAH: Counsel, for purposes of the record, this is tab
24 1, page 8, paragraph 45 and that paragraph reads:

10:39:21 25 "The junta forces recaptured Koi du from the Kamajors. This
26 attack had been led by Akim. The witness remembered entering the
27 town at around 0400 hours and it was under AFRC/RUF control at
28 that time. Morris Kallon, Issa Sesay, Johnny Paul Koroma, Paolo
29 Bangura and most of the AFRC ministers, including Eddie Kanneh,

1 were there. They all left the following day in a major convoy
2 for Kailahun. The witness did not have a radio set at that
3 time":

10:40:08 4 Q. Madam Witness, are you saying that when you made these
5 remarks you were saying that you yourself personally did not have
6 a radio set?

7 A. Yes, as I stated there, "the witness", I hadn't a set.

8 Q. But you're suggesting to us in court that the movement, as
9 you call it, or the RUF, did have radio sets that you could use?

10:40:31 10 Is that your evidence, Madam Witness?

11 A. Yes.

12 Q. And it was about that time you went to PC Ground, yes?

13 A. Yes, when the ECOMOG advanced on Koidu.

10:41:01 14 Q. Now, yesterday you told us while you were at PC Ground it
15 was common knowledge that Issa Sesay had misplaced some diamonds
16 in Liberia. Do you recall telling us that?

17 A. Yes.

18 Q. Do you know exactly when Issa Sesay is said to have been in
19 Liberia?

10:41:29 20 A. I can't recall the exact date or the time Issa went to
21 Liberia, like I said. They didn't send any message to me or my
22 commander that Issa Sesay was departing today, this date or this
23 month, for Liberia to take along diamonds. I only knew about the
24 diamonds when they got missing. When - before they did not send

10:41:58 25 a message to us that the diamonds had gone missing. It was
26 through people who had left Buedu that we first got this
27 information that this thing had happened and it was because of
28 the grumbling that was going around that they finally sent a
29 message for commanders to meet to discuss this issue.

1 Q. I'm trying to find out if you know exactly when Issa Sesay
2 is said to have been in Liberia. Is your answer that you do not
3 know?

4 A. I don't know when he was there.

10:42:40 5 Q. All you heard was rumour, right, Madam Witness?

6 A. Yes.

7 Q. You never saw any diamonds yourself of course, right?

8 A. Those that Issa Sesay took along, I did not see them.

9 Q. You heard of diamonds being misplaced in a hotel room or in
10:43:07 10 a hotel in Liberia, right?

11 A. Yes.

12 Q. As you sit there now you don't know if any diamonds were
13 taken to Charles Taylor, do you?

14 A. I don't know of that.

10:43:32 15 Q. And you weren't at the meeting where this alleged issue of
16 diamonds missing was discussed in Buedu when Sam Bockarie
17 convened the RUF commanders, right?

18 A. Yes.

19 Q. "Yes" means you weren't at the meeting, correct?

10:43:57 20 A. I was not there at all.

21 Q. You were also not there when Sam Bockarie received messages
22 or is said to have received messages from Liberian stations,
23 correct?

24 A. I don't know of a message he received from a Liberian
10:44:27 25 station because I was not with him in Buedu. I only know of the
26 call referred from Liberia to Sam Bockarie, but I don't know of a
27 direct message; whether they were sending a message on our own
28 net.

29 Q. All you know is what you heard on the radio. Is that your

1 evidence, Madam Witness?

2 A. I knew not only what I heard on the radio if it were
3 information, except if it pertains to discussions if it was not
4 on a radio or on the satellite phone. I never operated at
10:45:20 5 Mosquito's station, but I used to hear it over the net when
6 radios - the Liberian station was calling Mosquito's station to
7 go on the satellite phone and because I was not there I wouldn't
8 know what the message was there.

9 Q. And you do not know whether Sam Bockarie in fact went on
10:45:43 10 the satellite phone and called Liberia, yes?

11 A. I know that he used to go there.

12 Q. How do you know that, Madam Witness?

13 A. From his radio operators.

14 Q. Which radio operator, Madam Witness?

10:46:12 15 A. Sebatu, Zedman, Major Sellay.

16 Q. You don't know who was the source or the person who was
17 calling Sam Bockarie from Liberia saying, "Get on the 2-1", do
18 you?

19 A. The person used to say his father, Sam Bockarie, should get
10:46:38 20 on the 2-1 to talk to his father. I only knew except if somebody
21 tells me that it's at this time that Sam Bockarie is on the
22 satellite or what was happening, but the person won't name names
23 that this person says he wants to talk to Sam Bockarie on the
24 net.

10:47:01 25 Q. You never heard any conversations between Charles Taylor
26 and Sam Bockarie, correct?

27 A. I did not hear it.

28 MR ANYAH: Madam Court Officer, can I have your assistance,
29 please. Your Honours, I will be referring to some photographs in

1 the Prosecution's tab of exhibits and I do have an additional
2 paragraph not included in that group. The tab is - I believe in
3 my document it's tab 15 and there are two photographs. I don't
4 know if it was given to the Bench.

10:48:00 5 MR SANTORA: It was distributed to the Bench as well.
6 These were initially potential Prosecution exhibits I think
7 Defence counsel is referring to.

8 MR ANYAH: Yes, that's correct.

9 MR SANTORA: I believe it was tabs 13 and 14.

10:48:23 10 MR ANYAH: Okay, I have mine in tab - well I have it twice,
11 you're correct. Tabs 13 and 14 and I also have it in 15, but 13
12 and 14, I understand. I do have an additional photograph. I
13 will pass it first to opposing counsel to take a look at it and
14 if you can also show the judges as well.

10:48:50 15 PRESIDING JUDGE: [Microphone not activated].

16 MR ANYAH: Yes, Madam President, that's an additional
17 photograph that is not included in the Prosecution's --

18 PRESIDING JUDGE: We are just clarifying that there is only
19 one copy and it has to be returned to you for purposes of your
10:49:56 20 cross-examination?

21 MR ANYAH: I have a copy for myself and that's to be
22 displayed to the witness.

23 PRESIDING JUDGE: I see.

24 MR ANYAH: But I first would like to ask one question
10:50:04 25 before we publish it:

26 Q. Madam Witness, have you ever heard the name Zigzag Marzah?

27 A. I heard it.

28 Q. In what context have you heard that name before?

29 A. I used to hear that he used to come to Buedu, but I did not

1 see him and I did not know him in person.

2 Q. Now, when you met with the Prosecution last October they
3 showed you some photographs and they asked you to take a look at
4 them and see if you could recognise the people pictured. Do you

10:50:54 5 remember that, Madam Witness?

6 A. Yes.

7 MR ANYAH: Could you show her the photograph with the ERN
8 number P0001133:

9 Q. Madam Witness, do you recall being shown this photograph
10:51:29 10 last October by the Office of the Prosecutor?

11 A. Yes.

12 Q. And do you see your signature on that photograph?

13 A. Yes.

14 Q. And you see the date, right?

10:51:45 15 A. Yes.

16 Q. And do you see at the very top of the photograph somebody
17 wrote in pen "Superman"? Do you see that?

18 A. Yes.

19 PRESIDING JUDGE: Just pause, Mr Anyah. You said
10:52:03 20 "Superman" and it's been recorded as S-U-P-E-R-M-A-N and my
21 reading of it, and it's not entirely clear, is either S-U or S-Y
22 P-P-E-R.

23 MR ANYAH: I can ask the witness what she wrote:

24 Q. Madam Witness, were you the person who wrote what is
10:52:28 25 written in blue ink above the head of the photographed person?

26 A. Yes.

27 Q. And what did you write there? Please tell us.

28 A. S-U-P-P-E-R-M-A-N.

29 Q. And how do you know pronounce that, Madam Witness?

1 A. Superman.

2 MR ANYAH: Madam Court Officer, could you show her the next
3 photograph which ends in ERN 1132:

10:53:08

4 Q. Madam Witness, you also recall being shown this photograph
5 last October, yes?

6 A. Yes.

7 Q. And you do see your signature there, correct?

8 A. Yes.

10:53:22

9 Q. And were you the person who wrote "Issa Sesay" as it
10 appears on this photograph?

11 A. Yes.

12 Q. You do not know the person in the red, white and blue
13 shirt, do you?

14 A. No.

10:53:41

15 MR ANYAH: Thank you, Madam Court Officer. Can you show
16 her the next photograph, please:

17 Q. Madam Witness, do you recall being shown this photograph
18 last October?

19 A. Yes.

10:54:06

20 Q. Do you know who are pictured in this photograph?

21 A. I can't recognise their faces so I do not know the persons
22 who are in there.

23 Q. Have you ever seen Zigzag Marzah before?

10:54:32

24 A. I have told you that I have never seen him and I do not
25 personally know him.

26 Q. Have you ever seen Sam Bockarie before?

27 A. Yes.

28 Q. Do you see somebody in the photograph with sunglasses and
29 what looks like a radio in his hands?

1 A. Yes.

2 Q. Is that Sam Bockarie, Madam Witness?

3 A. Like from the way the person is I'm unable to recognise
4 him.

10:55:08 5 Q. If somebody came into this courtroom and said that was Sam
6 Bockarie, would you agree, Madam Witness?

7 A. If the person knows him the way he knows him I can't say I
8 will accept, because I cannot understand the face. You will know
9 somebody in different ways, or by different parts on his body.

10:55:34 10 Like I saw Superman and, even if I had not seen his face, I can
11 see something that would suggest to me that was Superman.

12 Q. How many occasions would you say you've seen Sam Bockarie
13 before?

14 A. I saw him in Kailahun. Since I left Kailahun in '93 I saw
10:56:01 15 him once in Zogoda, until I saw him again in Kono.

16 Q. You also saw him in Buedu when you said you saw them going
17 to Foya, yes?

18 A. Yes.

19 Q. Indeed you saw him twice on the same day, right?

10:56:28 20 A. Yes.

21 Q. And as you look at this person on the left with the radio
22 you do not know if it's Sam Bockarie, yes?

23 A. I can't still agree because the picture is not showing it
24 to me the way I knew him.

10:56:48 25 MR ANYAH: Thank you, Madam Court Officer. Madam
26 President, could this be marked for identification.

27 PRESIDING JUDGE: The last photograph you are referring to,
28 Mr Anyah?

29 MR ANYAH: Yes, Madam President.

1 JUDGE LUSSICK: Mr Anyah, I've been informed by the Legal
2 Officer that that picture is already in evidence as exhibit
3 P-30C.

4 MR ANYAH: Thank you, your Honour. I appreciate that.

10:57:22 5 JUDGE SEBUTINDE: I think the difference might be that
6 P-30C was actually marked and has the names of certain persons.
7 Whereas this, I think for good reason, has not been marked.

8 MR ANYAH: Yes. Unfortunately, we do not have a larger
9 sized version in our office although the Prosecution does have, I
10:57:43 10 believe, a larger sized version that was shown to the witness the
11 time.

12 PRESIDING JUDGE: [Microphone not activated].

13 MR ANYAH: I haven't brought it out in evidence, but these
14 were shown to the witness before and I believe she's agreed - I
10:57:59 15 can bring it out in evidence.

16 PRESIDING JUDGE: It's not necessary. Her evidence is
17 clear before us this morning.

18 MR ANYAH: I would ask for your Honours' indulgence. I
19 would like to see, in the first instance, if I can get a bigger
10:58:13 20 version of this. Well, I would like this marked for
21 identification, if your Honours please, given the observation
22 made by Justice Sebutinde. It is the same photograph, but the
23 practice thus far has been that we can have two versions of the
24 same photograph marked and tendered at the appropriate time.

10:58:44 25 PRESIDING JUDGE: That is a photograph showing two male
26 persons and some other persons in the background. It will be
27 MFI-1.

28 MR ANYAH: I thought 18. We were up to --

29 PRESIDING JUDGE: Not any more.

1 JUDGE SEBUTINDE: Mr Anyah, just to explain, yes we were at
2 17, but MFIs 1 to 15 have now been rendered obsolete, so we're
3 back to 1 again.

4 MR ANYAH: I see. We're back to 1. Okay, I understand.
10:59:28 5 Thank you, Justice Sebutinde.

6 PRESIDING JUDGE: Sorry, there are actually some MFIs for
7 the witness, two maps, for example. So they were 17 and 18 if I
8 remember correctly. So this is still 1.

9 MR ANYAH: Madam Court Officer, can we show the witness
11:00:01 10 MFI-16:

11 Q. Madam Witness, you remember looking at this map?

12 A. Yes.

13 Q. Either yesterday the 19th, or Wednesday the 18th, right?

14 A. Yes.

11:01:02 15 Q. And you will recall that when this map was produced, the
16 Prosecution, in the first instance, attempted to introduce a map
17 that you had marked outside of court, yes?

18 A. Yes.

19 Q. And on this map you told us, or you sketched out for us
11:01:26 20 certain areas that you say the RUF controlled in the vicinity of
21 PC Ground, or Superman camp, correct?

22 A. Yes.

23 MR ANYAH: I wonder if Madam Court Officer can zoom in a
24 little bit. Thank you, Madam Court Officer:

11:02:04 25 Q. Let's look at the green line going east. At number 1 you
26 have Meiyor and that's where you said is Superman Ground,
27 correct?

28 A. Yes.

29 Q. And going east all the way to the end, where you have

1 number 3, at number 3 is a place called Kamiendo, correct?

2 A. Kamiendo, yes.

3 Q. And that's the Guinea Highway, correct?

4 A. Yes.

11:02:47 5 Q. And you told us the RUF controlled that entire area, yes?

6 A. Yes.

7 MR ANYAH: Madam Court Officer, if we could show the orange
8 line as the focus now:

9 Q. Now, Madam Witness, again you sketched out, going south,
11:03:16 10 the areas of this stretch of highway that you said the RUF
11 controlled. You said, going south, they controlled from near
12 Koi du, going south through Gandorhun, all the way down to Manowa
13 Junction. Do you see Manowa Junction, Madam Witness?

14 A. Yes.

11:03:49 15 Q. All the way back up through the loop to where you have
16 number 5 at the end. Do you see that, Madam Witness?

17 A. Yes.

18 Q. Now, outside of court the Prosecution asked you to draw the
19 same thing, yes?

11:04:07 20 MR SANTORA: Objection, your Honour. Your Honour, I'm
21 objecting because counsel is going to apparently ask questions
22 about an exhibit that the Prosecution was precluded from asking
23 any questions about to this witness and now Defence counsel is --

24 PRESIDING JUDGE: We don't know that, because he hasn't had
11:04:30 25 a chance to finish it completely. Let's see what he asks and
26 then we will entertain your objection.

27 MR SANTORA: Thank you, your Honour.

28 MR ANYAH: Indeed I am going in that direction, Madam
29 President.

1 PRESIDING JUDGE: Formulate your question and then we will
2 deal - Madam Witness, you are not to answer the next question
3 until we have dealt with a procedural matter.

4 MR ANYAH:

11:04:53 5 Q. Well, Madam Witness, the point I'm getting to is the
6 Prosecution asked you to draw the same areas the RUF controlled
7 outside of court, yes?

8 MR SANTORA: Objection. The objection is that Prosecution
9 was never given the opportunity to ask the witness what she was
11:05:10 10 asked to draw on the map outside of court and Defence counsel is
11 putting this to her now that what - this map that Prosecution was
12 precluded from asking any questions about, is now asking the
13 witness questions about a map that was not introduced to this
14 courtroom.

11:05:29 15 MR ANYAH: Madam President, if I could respond, please.

16 PRESIDING JUDGE: Yes, please do.

17 MR ANYAH: I think this is perfectly proper procedure in
18 cross-examination, to the extent I can show that she has made an
19 inconsistent statement out of court that contradicts what she has
11:05:44 20 done in court. This is no different than a statement. It's no
21 different than a statement.

22 PRESIDING JUDGE: Mr Anyah, first of all, as I've said, I
23 still don't really know what the question is. That's my first
24 point, which I reiterate. My second point: The whole issue of
11:06:01 25 prior inconsistent statements, to my mind, extends also to
26 something that is written or marked on a map and therefore I will
27 allow the question, if in fact it eventuates that it is put, and
28 counsel for the Prosecution is of course entitled to clarify any
29 issue he deems appropriate in re-examination.

1 MR ANYAH: Thank you, Madam President. Now, Madam Court
2 Officer, I will give you another map. This is the one the
3 Prosecution handed to your Honours which was shown to the witness
4 outside of court and marked by the witness outside of court. The
11:06:38 5 ERN number is 00100940 and I believe your Honours have copies of
6 it because the Prosecution provided copies of it.

7 PRESIDING JUDGE: Mr Anyah, there were two - yes, 940. I
8 have it in front of me. Thank you.

9 MR ANYAH:

11:07:42 10 Q. Madam Witness, on the bottom right-hand corner of that map
11 do you see your signature?

12 A. Yes.

13 Q. You signed that signature outside of this courtroom,
14 correct?

11:08:00 15 A. Yes.

16 Q. You signed that signature when the Prosecution showed you
17 this map here in The Hague, yes?

18 A. Yes.

19 Q. There are inscriptions, as in names, in the middle of the
11:08:18 20 map. Who wrote those names, Madam Witness?

21 A. I wrote them.

22 Q. And the green lines on this map are what you drew as being
23 RUF held territories, correct?

24 A. Yes.

11:08:39 25 Q. Well, let's look at what we just looked at on the previous
26 map, MFI-16, on this map, the stretch from Koidu going south.
27 Madam Court Officer is placing MFI-16. You see that where you
28 have written as number 5 to the south east, a place that appears
29 to me to be - is it Lalehun, Madam Witness? What is that place

1 called?

2 A. Lalehun.

3 Q. Lalehun. All the way down and over up towards Koidu, you
4 said that was controlled by the RUF, in court, right?

11:09:31 5 A. Yes.

6 Q. And we if we go to the other map, Madam Court Officer, do
7 you see the green line from near Koidu all the way to Manowa
8 Junction? Do you see that, Madam Witness?

9 A. Yes.

11:09:55 10 Q. That is what you said in court was controlled by the RUF,
11 correct? I'm sorry, that is what you said outside court as the
12 area being under the control of the RUF, yes?

13 A. Like I was hearing a while ago as to how the question was
14 asked, the way they asked me the question, that was how I

11:10:20 15 answered it. The question on this map was not directly in
16 relation to where the RUF control started and stopped. This one,
17 in this court, was where it started and stopped.

18 MR ANYAH: May I have a moment to check the transcript,
19 Madam President?

11:10:54 20 PRESIDING JUDGE: Yes, Mr Anyah.

21 MR ANYAH:

22 Q. Madam Witness, I just asked you a few minutes ago, in
23 relation to this out of court map, and my question at page 47,
24 line 4, was, "And the green lines on this map are what you drew
11:11:19 25 as being RUF held territories, correct?", and you said yes.

26 A. Yes, they are still RUF territories.

27 Q. And in court you were asked to draw RUF held territories
28 and on MFI-16 you drew the territory as encompassing areas
29 including from the Manowa Junction, all the way up to Lalehun,

1 yes?

2 A. Yes. Like I said again, this map that I marked outside
3 included RUF territories. It was not up to where RUF territories
4 stopped that I marked it. It was based on a question that I
11:12:06 5 marked. I am sure if the question had asked me in court about
6 this map - he knew the questions that he asked me when I drew
7 this map. This one was the territories that we controlled from
8 around Koidu Town to where was under our own control from
9 Superman Ground to Gandorhun or Yomandu.

11:12:31 10 PRESIDING JUDGE: I was going to ask the witness to clarify
11 when she said "this one". Which one is Madam Witness referring
12 to?

13 THE WITNESS: The one I am looking at now that I marked
14 outside court.

11:12:48 15 MR ANYAH:

16 Q. Why did you stop at Manowa Junction, Madam Witness, why,
17 outside court? What is the significance of Manowa Junction?

18 A. There is a significance about Manowa Junction because it's
19 a main place where we were not totally based, but it was through
11:13:11 20 there that we passed and sometimes fighting did occur there and
21 soldiers were not based there. The lawyer knows, the Prosecutor
22 knows the question that he asked me.

23 Q. I asked you a compound question. You answered one of the
24 two. Why did you stop at Manowa Junction when you drew on the
11:13:36 25 map outside of court?

26 A. I am still saying that it was based on the question that I
27 was asked that made me to stop there.

28 JUDGE SEBUTINDE: Mr Anyah, I would like to know what
29 question she was asked when she drew this line, the green line,

1 outside of court.

2 MR ANYAH: Yes, Justice Sebutinde:

3 Q. Madam Witness, when they told you to draw a line from Koidu
4 all the way down, what was the specific question you were asked?

11:14:12 5 MR SANTORA: Objection. Counsel has just stated that when
6 you were told - to the witness "when you were told to draw a line
7 from Koidu" and --

8 MR ANYAH: I understand. I can rephrase it.

9 MR SANTORA: I think it should be rephrased significantly.

11:14:29 10 MR ANYAH: I'm not meaning to suggest that they led the
11 witness if that is the implication it gives, so I will rephrase
12 it:

13 Q. Madam Witness, this green line that appears on this map
14 from Koidu, what were you asked when you drew this line?

11:14:45 15 A. The first one was from Koidu to where the bases were.

16 Q. What bases are you referring to, Madam Witness?

17 A. The bases that were around Koidu that had radio stations.

18 Q. Are we speaking about the same line? I'm referring to the
19 line from Koidu going south all the way to the Manowa Junction.

11:15:14 20 PRESIDING JUDGE: Mr Anyah, if there is any doubt maybe if
21 you held up your map and indicated to ensure that you are both
22 talking about the same thing.

23 MR ANYAH: Yes, Madam President:

24 Q. Madam Witness, are we speaking about the same line, the one
11:15:31 25 that starts from Koidu and it goes down? It's in green.

26 A. Yes, that's what I'm looking at.

27 Q. And my question is this: When you drew that line, what was
28 the question that you were responding to when you drew it?

29 A. Where those who were in Gandorhun who were also coming to

1 Koidu from Gandorhun, from Gandorhun, where they stopped in Koidu
2 and from Gandorhun where they were going on patrols from
3 Gandorhun, where I knew that they were going on patrols and
4 that's where I stopped. If they asked me where was under RUF
11:16:27 5 territory at that time, on the other map I stopped where I knew
6 of.

7 Q. So what you're telling us in court is that when you drew
8 this line you were asked to indicate the area under the RUF -
9 well, let me rephrase that. You were asked to indicate which
11:16:54 10 persons were in Gandorhun, yes?

11 A. Yes.

12 Q. And you indicated Banya, CO Isaac and RUF Rambo, also known
13 as Boston Flomo, correct?

14 A. Yes.

11:17:14 15 Q. And what you're suggesting to us in court is that the part
16 of the line that draws from Gandorhun all the way to Manowa
17 Junction, you drew it because it was the area being patrolled by
18 these people assigned to Gandorhun. Is that your evidence?

19 A. Yes.

11:17:36 20 Q. But in court the Prosecution asked you to draw areas
21 controlled by the RUF and not areas being patrolled by the
22 commanders in Gandorhun. Would you agree that's the way this map
23 was presented to you in court?

24 A. Yes.

11:17:58 25 MR ANYAH: Madam Court Officer, on the same MFI-16, if we
26 went to the top portion - and I'm not sure what colour the
27 inscription was in again. Yes, the yellow line. Thank you,
28 Madam Court Officer:

29 Q. In court you were shown again MFI-16 and you were told to

1 draw RUF controlled areas, again from the vicinity of Koidu, but
2 really starting at Sefadu, all the way up north, and you drew the
3 line that appears in yellow. Do you recall that, Madam Witness?

4 A. Yes.

11:18:40 5 Q. At Sefadu you have number 8 and it ends all the way north
6 at a place - is it Kondea?

7 A. Yes.

8 Q. And there a number 9 next to that, right?

9 A. Yes.

11:19:04 10 Q. Now, let's see what you drew outside court, the document
11 ending in ERN 0940. Madam Witness, do you see the green line
12 that starts from Sefadu?

13 A. Yes.

14 Q. And do you see that it ends at Yomandu?

11:19:33 15 A. Yes.

16 Q. You agree with me it doesn't go all the way up to where
17 number 9 was on MFI-16?

18 A. Yes.

11:19:50 19 Q. What questions were you asked and to which you responded
20 when you drew this green line from Sefadu, outside of court?

21 A. The commander who was based, or the men who were based in
22 Yomandu, where they stopped in control to Koidu.

23 Q. That is all you were responding to when you drew this green
24 line. Is that your evidence, Madam Witness?

11:20:14 25 A. Yes, from Yomandu to Small Sefadu.

26 Q. Do you see the green line from - and I can't tell what the
27 name is, but it looks like Jagbwema, all the way to Woama. To
28 the east of Koidu, Madam Witness, there is what appears to be a
29 triangle with Koidu to the west, a place that appears to be

1 Jagbwema to the east and to the south a place that appears to be
2 Woama. Do you see that, Madam Witness?

3 A. I have not seen where Woama is.

4 Q. When you look at the green line from Koidu, the first town
11:21:35 5 you meet, do you know what that town is, going south?

6 A. I don't know if I can see it better on this other map. The
7 markings are on it, I am not seeing it clearly.

8 Q. On the other map it is spelt W-O-A-M [sic]. Do you know
9 such a town or village?

11:22:14 10 A. Yes, it's Woama.

11 PRESIDING JUDGE: W-O-A-M-A.

12 MR ANYAH: Yes, Madam President. It's W-O-A-M-A, yes:

13 Q. Madam Witness, you say it's Woama?

14 A. Yes, it's Woama.

11:22:29 15 Q. And do you know a town called Jagbwema, spelt on this map
16 J-A-B-W-E-M-A [sic]?

17 A. Yes.

18 Q. And you were the one that made the markings between Woama
19 and Jagbwema, yes?

11:22:51 20 A. Yes.

21 Q. What was the significance of what you marked in relation to
22 that triangle?

23 A. The line from Koidu and Meiyor where Superman was based,
24 which goes down straight to Jagbwema, up to the Guinea border
11:23:14 25 area, and this line coming from Gandorhun to near Koidu, on the
26 line across was how we, from Superman's location, joined those
27 when we met in Gandorhun. That was the route I drew to come and
28 join the line in Gandorhun.

29 Q. Okay, thank you.

1 JUDGE SEBUTINDE: I wonder if the witness could actually
2 move to the projector instead of describing this verbally, so she
3 could at least show us that this particular line, from this
4 particular point, signifies such and such.

11:23:58 5 MR ANYAH: Yes:

6 Q. Madam Witness, what you've just explained for us, the
7 triangle we've been talking about, could you point how you moved
8 from Superman Ground to Gandorhun and the routes you took.

9 A. Like I said, from Koidu, near Koidu, this line coming down
11:24:30 10 straight to Gandorhun and where Gandorhun commanders used to go
11 on patrols, that is it coming down. From where Superman was
12 based, that is Meiyor, coming towards this end, this line here,
13 it's when those of us who were at Superman's location, the way we
14 came in touch with those in Gandorhun, the routes we used. We
11:25:02 15 still came to this Jagbwema and there was a road there coming to
16 Woama that comes down straight without coming near Koidu, this
17 middle line.

18 Q. Thank you, Madam Witness. I would like the witness to be
19 shown MFI-17, please. Madam Witness, you were shown this map
11:26:04 20 either yesterday or the day before and you made some inscriptions
21 in court. Do you remember that, Madam Witness?

22 A. Yes.

23 Q. You recall that this was your routes of travel from
24 Superman Ground, going through Yomandu, on your way to Koinadugu,
11:26:37 25 correct?

26 A. Yes.

27 MR ANYAH: I wonder if Madam Court Officer could zoom in a
28 little bit, starting from Superman Ground which would be number
29 1, I believe, yes:

1 Q. Now, Madam Witness, when you were shown this map you marked
2 Meiyor, Superman Ground, as number 1. Do you see that,
3 Madam Witness?

4 A. Yes.

11:27:34 5 Q. And you told us which route you took going through Tombodu,
6 yes?

7 A. Yes.

8 Q. And then Peyima, right?

9 A. Yes.

11:27:52 10 Q. And then to Yomadu, right?

11 A. Yes.

12 PRESIDING JUDGE: Mr Anyah, I think we're just about out of
13 time. I was alerted that there was less than a minute and that
14 was at least less than a minute ago. Unfortunately it's in the
11:28:16 15 midst of your question, but the tape has run out.

16 Madam Witness, we are now going to take the mid-morning
17 break. As you know, we break for half an hour. We will resume
18 court at 12 o'clock and I will now ask that court be adjourned
19 until 12.

11:28:32 20 [Break taken at 11.30 a.m.]

21 [Upon resuming at 12.00 p.m.]

22 PRESIDING JUDGE: Please proceed, Mr Anyah.

23 MR ANYAH: Thank you, Madam President:

24 Q. Madam Witness, before the break we were considering MFI-17
11:59:41 25 and I would like to pick up where we left off, if it please the
26 Court. Specifically we had considered where you marked number 1
27 as PC Ground, Meiyor and this is the green line that appears on
28 the map. Now, Madam Witness, on this map in court, either
29 yesterday or the day before, you traced for us the trajectory of

1 the route you took when you left PC Ground and how you went to
2 Yomandu and ended up in Koinadugu. You remember that, yes?

3 A. Yes.

12:00:49

4 Q. Do you see that on the basis of what you have drawn in
5 court, you started at PC Ground, you went to Tombodu, went to
6 Peyima and ended up at Yomandu, yes?

7 A. Yes.

8 Q. Was it at Yomadu you met this fellow by the name of
9 Senegal ese?

12:01:15

10 A. Yes.

11 Q. The trajectory then continues from Yomadu all the way up to
12 -I see Baudu on the way. Is that correct, Madam Witness?

13 A. It is Baudu.

14 Q. How do you spell that?

12:01:50

15 A. B-A-U-D-U.

16 Q. And then it goes up to Mansofinia, yes?

17 A. Yes.

18 Q. Now, the Prosecution gave you a map like this outside of
19 court recently, yes?

12:02:10

20 A. Yes.

21 Q. And they asked you to trace the route you took on the way
22 from Superman Ground to Koinadugu, correct?

23 A. Yes.

12:02:30

24 MR ANYAH: Madam Court Officer, can we show the witness -
25 and your Honours this map was also given to your Honours. It is
26 an out of court map that has the ERN number 00100939:

27 Q. Madam Witness, on the lower left-hand corner of that map,
28 near the ERN number, do you see your signature?

29 A. Yes.

1 Q. This was a map that you signed outside of court here in The
2 Hague when being shown it by the Office of the Prosecutor, yes?

3 A. Yes.

12:03:31

4 Q. And in the context of this map, what you marked was the
5 route that you and your group took when you left Superman Ground
6 all the way to Koinadugu and on to Makeni, right?

7 A. Yes.

12:03:55

8 Q. If we focus on the area near Superman Ground, do you see,
9 Madam Witness, that on this map when you traced the trajectory
10 you have shown that you passed the towns of Sidu and Tefeya to
11 get to Yomadu. Madam Court Officer, it is not in the position
12 that shows the area near Superman Ground. Yes, that is better.

12:04:31

13 Madam Witness, do you see what I am pointing at, or
14 directing you to? Do you see that in what you marked outside of
15 court? You also marked that your group traversed through Sidu
16 and Tefeya before getting to Yomadu.

17 A. No.

12:04:55

18 Q. Well, can you put your pen on that map you are looking at
19 and start where the green line goes and go from Meiyor to
20 Tombodu. Just take your pen and draw along the line as I call
21 the towns. So can you start, Madam Witness, from Meiyor and
22 follow the green line - you don't have to draw hard on it. You
23 could just put your pen above the map and just point. Do you see
24 that the green line goes first to Peyima, yes?

12:05:21

25 A. Yes.

26 Q. It goes down to Sidu, yes?

27 A. Yes.

28 Q. And also through Tefeya, yes?

29 A. Yes.

1 Q. All the way to Yomadu, right?

2 A. Yes.

3 Q. When you marked the map in court you did not include Tefeya
4 and Yomadu, did you?

12:05:41 5 A. No.

6 MR ANYAH: Madam Court Officer, can we go back to MFI-17
7 and I want to go to the top portion of the map. Yes:

8 Q. Now, Madam Witness, you see the orange line on that map,
9 yes?

12:06:18 10 A. Yes.

11 Q. You see how it goes from Kurubonla to Bendugu, yes?

12 A. Yes.

13 Q. And you see how it goes from Bendugu all the way up to
14 Koinadugu, right?

12:06:38 15 A. Yes.

16 Q. And you drew that for us in court a few days back, correct?

17 A. Yes.

18 Q. And this is supposed to represent the route that you and
19 your RUF members took to get to Koinadugu, right?

12:06:59 20 A. Yes.

21 Q. What you have marked for us in court differs from what you
22 marked out of court when you look at the other map, does it not?

23 And, Madam Court Officer, could you display the other map, the
24 stretch from Bendugu to Koinadugu. Madam Witness, do you see the

12:07:38 25 green line on the map you are looking at that ends with ERN0939?

26 A. Yes.

27 Q. In particular, do you see the part from Bendugu to
28 Koinadugu?

29 A. Yes.

1 Q. It was you who drew that green line, right?

2 A. Yes.

3 Q. And this one is different in the sense that it goes
4 straight from Tomania to Koinadugu, right?

12:08:23 5 A. Yes.

6 Q. And you are the same person who drew on both maps, correct?

7 A. Yes.

8 Q. Now, when you look at the map that you have in front of
9 you, let's take Makeni for example, do you see that there are

12:08:54 10 handwritten words underneath Makeni? I can't make them out, but
11 perhaps you could help us. Do you see any words written on that
12 map by a pen?

13 A. Yes.

14 Q. Underneath Makeni does it say "12/24"?

12:09:23 15 A. Yes.

16 Q. Does that mean 24 December, Madam Witness?

17 A. 24 December, yes.

18 Q. Was it you that wrote that on the map, Madam Witness?

19 A. Yes.

12:09:44 20 Q. And that is saying, correct me if I'm mistaken, that you
21 and your group were at Makeni on 24 December 1998 heading towards
22 Freetown, right?

23 A. No.

24 Q. What does 24 December mean as written on that map?

12:10:07 25 A. 24 December was the date I left the village where I was to
26 go towards Makeni and after I had identified it they asked me to
27 mark the 24 December on it, but I actually entered Makeni on 25
28 December and that was not the date I left Makeni to go to
29 anywhere else.

1 Q. Well, now you just said you left the area where you were on
2 24 December, yes?

3 A. Yes.

4 Q. And you actually entered Makeni on the 25th, right?

12:10:48 5 A. Yes.

6 Q. And that is the significance of the 24th. You were putting
7 the date you left to go to Makeni next to Makeni. Is that your
8 evidence?

9 A. Yes.

12:11:02 10 Q. When you look at Lunsar it says "1/6". Do you see that
11 next to Lunsar?

12 A. Yes.

13 Q. What does the "1/6" mean, Madam Witness?

14 A. 6 January.

12:11:34 15 Q. And does that mean you were at Lunsar on 6 January?

16 A. Yes.

17 Q. And that is when you heard - well, on 6 January you told us
18 you heard nothing over the radio, correct?

19 A. Yes.

12:11:52 20 Q. Was this both the RUF radio network and any other
21 commercial radio network? When you say you heard nothing, did
22 you mean both?

23 A. Yes.

24 Q. And when you go down on this map to Hastings, do you see
12:12:20 25 "1/8", Madam Witness?

26 A. Yes, yes.

27 Q. And "1/8" means what in the context of this map?

28 A. That was the date I left Lunsar for Hastings.

29 Q. It was not the date you got to Hastings, is that what

1 you're saying?

2 A. No.

3 Q. If you left Lunsar on the 8th for Hastings, when exactly
4 did you get to Hastings?

12:13:07 5 A. I left Lunsar and I got to Hastings the following morning,
6 around 4 to 5 o'clock.

7 Q. So you left Lunsar on the 8th and you got to Hastings the
8 following morning which would be the 9th. Is that fair to say,
9 Madam Witness?

12:13:35 10 A. Yes.

11 Q. Did you tell us in court yesterday that you arrived in
12 Hastings on the 8th?

13 A. I said I left Lunsar on the 8th at about 4.30 and I was at
14 Gberi Junction up to 7 o'clock and I got to Hastings the
12:14:12 15 following morning around 4.30. They asked me whether it was 4.30
16 in the morning or in the afternoon.

17 MR ANYAH: Madam Court Officer, could we go to MFI-17, the
18 map that has been marked for identification. Madam President, if
19 it please your Honours, with respect to both maps that were
12:14:51 20 marked by the witness outside of court, this particular one
21 ending in ERN number 0939 and the other one ending in 0940, I
22 would respectfully request identification numbers.

23 PRESIDING JUDGE: Taking them in the sequence that they
24 were shown and evidence was adduced, 940 would be first and it
12:15:17 25 will become MFI-2. The next map the witness identified had an
26 ERN number ended in 939 and that will become MFI-3.

27 MR ANYAH: Thank you, Madam President:

28 Q. Now, Madam Witness, on this map you just told us that you
29 met Senegalese at Yomadu, yes?

1 A. Yes.

2 Q. Does this person, Senegalese, have another name?

3 A. I don't know any other name for him. I don't know.

4 Q. Was that the first time you had met this fellow?

12:16:03 5 A. Yes.

6 Q. When you met him Superman had already moved ahead towards
7 Koinadugu, correct?

8 A. Yes.

9 Q. And you say when you met Senegalese he had some men with
12:16:18 10 him, right?

11 A. Yes, it was Senegalese who met me.

12 Q. And let's be more specific. It wasn't just you. It was
13 you and other RUF fighters, yes?

14 A. Yes.

12:16:36 15 Q. What nationality was this fellow Senegalese?

16 A. Like I answered last, I did not ask Senegalese about his
17 nationality and I did not hear him speak any other dialect apart
18 from the Liberian English and he told me that he was from
19 Liberia. So I did not ask him whether he was a Liberian or what
12:17:05 20 his nationality was.

21 Q. How many men did Senegalese meet you at Yomadu with?

22 A. 30.

23 Q. And what did you understand the name of the group in which
24 these men belonged to to be?

12:17:41 25 A. What they told me was that they were STF.

26 Q. When you say STF, what does STF stand for?

27 A. Special Task Force.

28 Q. And you agree that there was something called the STF or
29 Special Task Force in existence around this time in 1998 among

1 the warring factions in Sierra Leone, yes?

2 A. Yes.

3 Q. The leader of the Special Task Force was David Livingstone
4 Bropl eh, General Bropl eh, yes?

12:18:24 5 A. Yes.

6 Q. Special Task Force had been in Sierra Leone for a very long
7 time fighting alongside the Sierra Leone Army, yes?

8 A. Yes.

9 Q. Special Task Force was made up of a number of ULIMO -
12:18:43 10 ex-ULIMO fighters, yes?

11 A. Yes.

12 Q. You will agree with me that ULIMO were the enemy of the
13 NPFL when you were in Kolahun in Liberia in 1993, yes?

14 A. Yes.

12:19:04 15 Q. You will agree with me that Special Task Force was made up
16 of ex-ULIMO Liberians, yes?

17 A. That was what I also understood.

18 Q. Those Liberians are not necessarily people that would like
19 Charles Taylor, given that they are from ULIMO, right?

12:19:35 20 A. Well, I cannot tell people's mind, but I knew about the
21 ULIMO who were in Liberia and who fought against the NPFL. But I
22 can't tell about the ones who were in Sierra Leone who were
23 fighting as the STF. So I don't know.

24 Q. But you spent more time in Sierra Leone than you did in
12:20:00 25 Liberia, yes?

26 A. Yes.

27 Q. It is one and the same ULIMO we are talking about when we
28 speak of ULIMO in Kolahun in 1993 and ex-ULIMO fighters in Sierra
29 Leone in 1998, yes?

1 A. The question I cannot answer directly, because the ULIMO
2 and the STF, I came to know them when they joined the AFRC. So I
3 can't tell whether they had been in Liberia at a certain point in
4 time whilst they were fighting there at the time ULIMO was
12:20:43 5 fighting there, whether they were fighting amongst that group.
6 So all the STF who came, when they said they were ULIMO, I don't
7 know. Maybe they were the ULIMO who were fighting against
8 Charles Taylor.

9 Q. You don't know, but we do agree that they were ULIMO -
12:21:05 10 ex-ULIMO fighters, to be precise, right?

11 A. Like you have said it, I will take it that way.

12 Q. Well, it's not like I said it. Have you told the
13 Prosecution they were ex-ULIMO fighters in a previous statement?

14 A. Yes.

12:21:26 15 Q. Now you said something in court that you did not believe
16 that the men with Senegalese were STF. Do you recall saying
17 that?

18 A. Yes.

19 Q. And why did you not believe that?

12:21:43 20 A. They asked me and I said the STF who joined the AFRC that I
21 knew about were speaking better Krio because they had stayed long
22 in Sierra Leone. They knew the names of so many towns and
23 villages. But in the case of Senegalese, when they came together
24 with the other men I did not hear them speak proper Krio. They
12:22:10 25 were speaking pure Liberian tongue. So I don't think they were
26 part of the STF that I knew that I saw amongst the AFRC.

27 Q. But let's start with Senegalese. Senegalese, as far as you
28 knew, was through and through an STF member, right?

29 A. No.

1 Q. Have you told the Prosecution before that he was STF?

2 A. I said Bai Bureh told me that Senegalese is an STF.

3 Q. You did say that, but you have also told the Prosecution
4 that some of the STF you knew were Colonel Wallace, yes?

12:23:13 5 A. Yes.

6 Q. Also known as Sea Never Dry, yes?

7 A. Yes.

8 Q. You said there was a Colonel Ngallah, N-G-A-L-L-A-H, yes?

9 A. Colonel Ngallah, yes.

12:23:36 10 Q. You said there was a Major Koroma, K-O-R-O-M-O [sic], yes?

11 A. Yes.

12 Q. And then you told them Senegalese. "He was very tall and
13 spoke Liberian and French." You included him amongst the STF,
14 did you not?

12:24:01 15 A. I included him. That is when they came and joined us when
16 we were at Koinadugu, he was together with the STF because they
17 spoke similar languages and they ate the same food.

18 Q. Where did you first hear the name Red Lion battalion, Madam
19 Witness?

12:24:33 20 A. At Koinadugu.

21 Q. And in what context did you hear that name?

22 A. Like I have said before, I met with the Red Lion battalion
23 in Koinadugu because Superman and others had already been in
24 Koinadugu and they asked me about the groups that were there and
12:25:01 25 they were the SLA, the STF and the RUF, and the particular Red
26 Lion was mostly comprised of the SLA, even before the new Red
27 Lion was formed at the time I was in Koinadugu.

28 Q. Well, let's leave the new Red Lion for a moment. Your
29 evidence is that the first time you heard the phrase Red Lion

1 battalion was when you were in Koinadugu, yes?

2 A. Yes.

3 Q. When you were in Superman Ground, before you embarked on
4 this trip, you had never heard the name Red Lion battalion, yes?

12:25:54 5 A. Yes.

6 Q. Did you ever meet Senegalese at Meiyor, PC Ground, also
7 known as Superman Ground, before you met him at Yomadu?

8 A. No.

9 Q. Did you tell the Prosecution previously that you first met
12:26:21 10 Senegalese at Superman Ground?

11 A. No, I told them that Senegalese passed through Superman
12 Ground. At that time I was in Yomandu and he met me in Yomandu,
13 but they passed through Superman Ground and they did not meet
14 Superman there, so they followed us to Yomandu and that was where

12:26:50 15 I saw him.

16 MR ANYAH: Madam Court Officer, can we show the witness tab
17 1, page 20, paragraph 119.

18 JUDGE SEBUTINDE: This is the Defence bundle?

19 MR ANYAH: Yes, Justice Sebutinde. That is page 20, ERN
12:27:43 20 number 00044547:

21 Q. Madam Witness, if you look at paragraph 119 it speaks about
22 when you first met Senegalese and it reads:

23 "The Red Lion battalion was comprised of STF, RUF, and
24 AFRC. 'Senegalese' was in Freetown and he was STF. The witness
12:28:36 25 first met him at Superman Ground. Senegalese had travelled there
26 from Buedu with other Liberians in a convoy. They were armed and
27 had food with them."

28 Do you see that, Madam Witness?

29 A. I have seen it, but I am sure that this - I had made some

1 correction with regards this particular line, but I can't tell
2 why they did not include that. The Red Lion battalion included
3 the STF, RUF, AFRC, that was the one that met me in Koinadugu,
4 that moved to join the Rosos group, but before that Red Lion
12:29:23 5 battalion was formed there was already in existence a Red Lion
6 battalion.

7 Q. You did make corrections and those are to be found at
8 tab 3, page 5, corrections in respect of paragraph 119. Madam
9 Witness, here is where you corrected paragraph 119 of your
12:30:20 10 previous statement. Paragraph 30, your statement from 3 March
11 2008, it reads:

12 "In reference to paragraph 119, witness indicates this is a
13 mistake. Witness does not believe Senegalese was in Freetown
14 because she saw him in Pumpkin Ground during the late 1998
12:30:43 15 offensive. She described him as being very, a person who would
16 stick out in a crowd."

17 This is a correction you made in reference to paragraph
18 119. Do you see, Madam Witness, that it doesn't change anything
19 about when you saw Senegalese for the first time?

12:31:07 20 A. Yes. The correction about when I saw him, I think I also
21 made that one, but I don't know. But, like I said, when I was
22 with the Prosecution I answered the questions that were asked of
23 me. So if they had asked me when I ever saw Senegalese again,
24 whether I knew that he went to Freetown, I would have said that I
12:31:36 25 did not know whether he was in Freetown, but that I saw him at
26 Pumpkin Ground. He was there with us.

27 Q. Yes, let's be fair. Let's go to tab 4, page 2, paragraphs
28 5 and 6. Paragraph 5 speaks of your arrival at Yomandu and in
29 the middle of the paragraph there is a section there that states:

1 "The witness states that the next day after she arrived in
2 Yomandu a Liberian commander called Colonel Senegalese arrived in
3 Yomandu with manpower, ammunition and food."

4 And it goes on to say they came from Buedu and it goes on
12:33:01 5 to say that these Liberian fighters belonged to Charles Taylor's
6 forces and that they were sent from Liberia by Charles Taylor to
7 join Sam Bockarie in Buedu, and that Sam Bockarie had sent them
8 to join Superman's group. Then paragraph 6, "The witness states
9 that this was the first time she was met Colonel Senegalese." It
12:33:30 10 is supposed to read that you met Colonel Senegalese. Is this the
11 correction you are referring to, Madam Witness?

12 A. It was the first time that I met with Colonel Senegalese.
13 He met me at Yomandu.

14 Q. Well, it is still one and the same place we are speaking
12:33:52 15 of, Yomandu, right?

16 A. Yes.

17 Q. So in your first statement to the Prosecution they have you
18 down as saying you met him for the first time at Superman Ground,
19 when he came with men, and your subsequent statements have you
12:34:10 20 saying that you met him at Yomandu, yes?

21 A. Yes, and that was the reason why we corrected the statement
22 because the person who wrote it wrote it that way, but I was not
23 at Superman Ground when Senegalese came there, so I can't say
24 that was where we met, or that was where I saw him.

12:34:32 25 Q. But do you see that you had the chance to correct it in
26 your statement in March 2008, that is correct your statement in
27 October, and in March you did not correct that portion that I
28 read to you previously in tab 3, page 5. You were more concerned
29 about whether or not he was in Freetown. Do you see that, Madam

1 Witness?

2 A. I am saying yes based on the time the correction took
3 place. It was a repeated question as to whether I was sure that
4 Senegalese was an STF or not and it was that question that I

12:35:22 5 answered to and then they said a correction. They did not ask me
6 to read it and correct it.

7 Q. And if you look at paragraph 7 you will see that you told
8 the Prosecution that in Kurubonla the Liberian fighters were
9 staying with the STF soldiers, yes?

12:35:49 10 A. Yes.

11 Q. At this time in Kurubonla had you heard the name Red Lion
12 battalion?

13 A. I did not meet the Red Lion battalion at Kurubonla.

14 Q. Madam Witness, to your knowledge who formed this group
12:36:10 15 called the Red Lion battalion?

16 A. I was not at Koinadugu during the operation that the Red
17 Lion battalion was formed. What I know is that I knew the
18 commander and most of the men who were there were SLAs. So I
19 don't know whether it was the SLA who formed it, or whether it
12:36:37 20 was Superman, or it was the STF themselves.

21 Q. Who was the commander of this group called the Red Lion
22 battalion in Koinadugu when you were there?

23 A. The one that I met was Rambo, SLA Rambo. The one that was
24 called Red Goat.

12:37:10 25 Q. Have you heard of a place called Colonel Eddie Town, Madam
26 Witness?

27 A. Colonel what?

28 Q. Colonel Eddie Town, E-D-D-I-E T-O-W-N.

29 A. I don't know whether I know something about Colonel Eddie's

1 town.

2 Q. Have you heard the name Med Baj ehj eh, or Mohamed Baj ehj eh
3 before?

4 A. Yes.

12:37:52 5 Q. Who is Mohamed Baj ehj eh, Madam Witness?

6 A. He was an SLA commander and he was a colonel .

7 Q. When you were at Koinadugu was Gullit there, Madam Witness?

8 A. No.

9 Q. Do you know who Gullit is, Madam Witness?

12:38:29 10 A. I don't recall whether if I saw him I would know him and
11 his physical stature, but I knew that he was an SLA who was part
12 of the AFRC government.

13 Q. Do you know his real name, Madam Witness?

14 A. I don't recall his name now.

12:38:59 15 Q. You make a distinction between the Red Lion battalion and
16 the new Red Lion battalion, correct?

17 A. Yes.

18 Q. Was it while you were also in Koinadugu that there came
19 into being something called the new Red Lion battalion?

12:39:22 20 A. Like I have said, I entered Koinadugu and the following day
21 this new Red Lion battalion was formed for them to go to Rosos.
22 I was in Koinadugu at that moment. I met the first one in
23 Koinadugu, but in the case of the new Red Lion, I was there when
24 it was formed.

12:39:49 25 Q. Was it also formed in Koinadugu?

26 A. I was in Koinadugu when they formed the new Red Lion.

27 Q. Was SLA Rambo commander of the new or the old Red Lion
28 battalion?

29 A. The old one.

1 Q. Who was the commander of the new Red Lion battalion?

2 A. O-Five.

3 Q. And you do not know who formed either the old or the new
4 Red Lion battalion? Correct me if I'm mistaken.

12:40:32 5 A. I am talking about the old one.

6 Q. Who formed the new Red Lion battalion, Madam Witness?

7 A. Superman.

8 Q. What were the constituent members or the different groups
9 that made up the new Red Lion battalion?

12:40:58 10 A. STF, SLA and the RUF.

11 Q. Bropleh, General Bropleh, he was at Koinadugu at the time,
12 right?

13 A. Yes.

14 Q. But Superman was, in your view, in charge of Bropleh, as in
15 who commanded who?

16 A. Yes, Superman.

17 Q. What was the purpose for your group to travel from Superman
18 Ground to Yomadu all the way to Koinadugu and ultimately to
19 Makeni? What was the objective of this trip?

12:42:00 20 A. I am sure that yesterday, or the day before, I answered
21 that Superman received an instruction to go and attack the SLA
22 who were with SAJ Musa at Kurubonla and the group that I stayed
23 with - that I moved with from Superman's base was to join
24 Superman at Superman's base.

12:42:28 25 Q. Indeed what you told the Prosecution when you first spoke
26 with them was that the instruction was for Superman to travel to
27 Kurubonla to attack and kill SAJ Musa and his men, yes?

28 A. Yes.

29 Q. As far as you know this group was not headed towards

1 Freetown to invade Freetown. They were going because the
2 instruction came that you should go and attack and kill SAJ Musa,
3 yes?

4 A. Yes.

12:43:18 5 Q. You know Komba Gbundema, yes?

6 A. Yes.

7 Q. He was one of the commanders that you told us about at
8 Yomadu, right?

9 A. Yes.

12:43:37 10 Q. Did Gbundema have bodyguards that were assigned to him,
11 Madam Witness?

12 A. Yes.

13 Q. Are you aware that Superman was Liberian, Madam Witness?

14 A. Yes.

12:43:54 15 Q. Superman also had a group that were assigned to him as
16 bodyguards, right?

17 A. Yes.

18 Q. Are you aware that witnesses have come before this Court
19 who have said that the Red Lion battalion was made up of

12:44:13 20 Superman's bodyguards, Madam Witness?

21 A. The Red Lion battalion, like I said, did not only comprise
22 or constitute Superman's bodyguards. It was his bodyguard that
23 acted as deputy commander to O-Five. And it was a mixed group.

24 His bodyguards alone wouldn't have comprised of that, because
12:44:41 25 they were not - they could not even have formed 50 of the total
26 number of men that were there in Koinadugu.

27 Q. Well, how many men made up the old Red Lion battalion?
28 Tell us, Madam Witness. Tell us?

29 A. I did not count each and every person that comprised the

1 Red Lion battalion, because since I joined the RUF I had never
2 been given a role to count a member of - the number of people
3 comprising a particular battalion. Maybe the people who had the
4 role to do that knew the number of people that comprised that
12:45:28 5 particular battalion, but I did not know. But - and I can also
6 estimate that they were about 300.

7 Q. That was the point; you could give an estimate. Your
8 estimate is that they were about 300, yes?

9 A. Yes.

12:45:47 10 Q. And how many people or fighters comprised the new Red Lion
11 battalion, Madam Witness?

12 A. I am talking about the new Red Lion battalion. Like I
13 said, I met the old one already formed. I just met the name in
14 existence, but I did not know how many men constituted it.

12:46:17 15 Q. That's fair enough. Are you aware witnesses have come
16 before this Court that have said the Red Lion battalion was
17 commanded by Mohamed Bajehjeh, Madam Witness?

18 A. I wouldn't deny that, like you said, but, like I am saying,
19 anybody who comes here, he or she will say what he knew and what
12:46:46 20 I know also is what I am telling you.

21 Q. Well, let's take a look at what some witnesses have said
22 about the Red Lion battalion. Let's begin with Nya Korto. You
23 know Nya Korto, right?

24 A. What? Sorry?

12:47:10 25 Q. Foday Lansana, the father of your children, from Nimba
26 County, Liberia, yes?

27 A. Yes.

28 Q. His real name is, as given to him by his father that he
29 told us in court, Nyahn N-Y-A-H-N, Korto K-O-R-T-O, Nessian. You

1 know that, do you not?

2 A. Nessian, I know him.

3 Q. It's one and the same person, CO Nya, right?

4 A. Yes.

12:47:49 5 Q. Well, I asked CO Nya some questions on 22 February -
6 actually the questions were posed by counsel opposite,
7 Mr Santora, sitting over there about the Red Lion battalion and
8 here is what CO Nya said. The transcript in question is from 22
9 February 2008. The relevant page being page 4529, line 17,

12:48:35 10 Mr Santora posing the question:

11 "Q. One more question at this point, Mr Witness. You said
12 that CY and Jumbo Blah were delegates from other platoons
13 that joined O-Five. Do you know what other platoons they
14 were from?

12:48:59 15 A. Yes, Jumbo Blah and CY were from the Red Lion
16 battalion, a battalion that was strictly under the command
17 and control and was considered as the bodyguard unit of
18 Superman and SAJ Musa."

19 Madam Witness, do you agree that the Red Lion battalion was
12:49:21 20 considered as the bodyguard unit of Superman?

21 A. If I may answer that question, what I knew --

22 Q. Madam Witness, first of all do you agree or disagree with
23 that proposition?

24 A. I disagree.

12:49:42 25 Q. Do you agree or disagree with the proposition that the Red
26 Lion battalion was considered the bodyguard unit of SAJ Musa?

27 A. I disagree.

28 JUDGE SEBUTINDE: I imagine we are talking about the new
29 Red Lion, the one that she was familiar with?

1 MR ANYAH: Well, I can clarify.

2 JUDGE SEBUTINDE: Or the one that she described as the new
3 Red Lion that was formed in her presence.

4 MR ANYAH: Yes, Justice Sebutinde. I can clarify:

12:50:23 5 Q. Madam Witness, let's start with the old Red Lion battalion.
6 Would you agree that they were the bodyguard unit or could -
7 rather should be considered the bodyguard unit of Superman?

8 A. You mean the new Red Lion battalion?

9 Q. No, the old one?

12:50:44 10 A. The old one, I cannot say the old one should be considered
11 that way, because, like I said, when I got to the base there the
12 old one was already in existence and the majority of them who
13 comprised it were SLA, but I did not know who and who comprised
14 it that were SAJ Musa's bodyguards. I knew that they were SLAs,
12:51:11 15 but I cannot say they were solely SAJ Musa's bodyguards.

16 Q. Would you say --

17 PRESIDING JUDGE: Just pause, Mr Anyah. I understand the
18 question was considered the bodyguard unit of Superman and the
19 answer appears to relate to SAJ Musa. What question was put to
12:51:30 20 the witness?

21 MR ANYAH: I meant Superman, but I can understand why she
22 might conflate the two. I can clarify:

23 Q. Madam Witness, let's do this one at a time. We are
24 speaking of both Superman and SAJ Musa and we are speaking of the
12:51:45 25 one and the same Red Lion battalion, the old one, not the new
26 one. Let's start with the old Red Lion battalion and Superman.
27 Do you consider that battalion to have been the bodyguard unit of
28 Superman?

29 A. You mean the old Red Lion battalion? No.

1 Q. Do you consider the old Red Lion battalion to have been the
2 bodyguard unit of SAJ Musa?

3 A. I have spoken about this old one. If I can talk about
4 bodyguard units, I talk about those who guarded SAJ Musa directly
12:52:34 5 and I did not know the SLAs who were amongst the Red Lion
6 battalion, whether they were SAJ Musa's bodyguards or who
7 actually they were guarding, but I knew that the number of SLAs
8 that comprised it formed the majority.

9 Q. How about the new Red Lion battalion? Could that battalion
12:52:59 10 be considered as either the bodyguard unit of Superman or SAJ
11 Musa?

12 A. Should I answer that again?

13 Q. Yes, Madam Witness, please.

14 A. I know that it was Superman who formed the group and even
12:53:22 15 if his bodyguards comprised that group, they were not up to ten.
16 We - with the number of --

17 JUDGE SEBUTINDE: Pause, Madam Witness. Mr Interpreter,
18 the witness said, "Even if his bodyguards were part of", I think
19 that is what she said, and you said "comprised" which is quite
12:53:45 20 different. What did the witness say?

21 THE INTERPRETER: Your Honours, could the witness please
22 repeat this.

23 PRESIDING JUDGE: Madam Witness, please repeat your answer.
24 We need to clarify the interpretation. Do you wish to have the
12:54:07 25 question put again?

26 THE WITNESS: Should I answer it directly? The bodyguards
27 for Superman in the new Red Lion battalion were not up to ten out
28 of 300 people, so I cannot consider them - I cannot consider the
29 unit to be solely Superman's bodyguard unit.

1 MR ANYAH:

2 Q. Would you agree then that some of the members of this unit
3 were Superman's bodyguards?

4 A. Yes.

12:54:51 5 Q. Do you know whether any of Komba Gbundema's bodyguards made
6 up the Red Lion battalion? Let's start with the old Red Lion
7 battalion.

8 PRESIDING JUDGE: When you say "made up", do you mean were
9 members of?

12:55:07 10 MR ANYAH: Yes, Madam President.

11 THE WITNESS: I cannot tell. I did not know much about the
12 old Red Lion battalion.

13 MR ANYAH:

14 Q. How about the new Red Lion battalion? Were any of its
12:55:23 15 members part of Komba Gbundema's bodyguards?

16 A. Part of them were there.

17 Q. While you were at Koinadugu, at any time was a battalion up
18 to the size of a thousand fighters formed in your presence?

19 A. I don't know.

12:55:52 20 Q. Well, Madam Witness, you told us the Red Lion battalion was
21 made up of about 200 people. I am asking you: While you were in
22 Koinadugu, did they form a battalion that has as its members up
23 to a thousand people?

24 MR SANTORA: Objection, your Honour. Counsel misstated the
12:56:11 25 number in the evidence.

26 PRESIDING JUDGE: Are you saying that counsel is putting a
27 prior part of evidence, or is he --

28 MR SANTORA: Counsel misstated what the witness said about
29 the number of people who made up the Red Lion battalion, at least

1 from my recollection.

2 PRESIDING JUDGE: I see. Is it the part of the question
3 that says, "You told us the Red Lion battalion was made up of
4 200"?

12:56:39 5 MR SANTORA: Yes.

6 PRESIDING JUDGE: If I recall the witness said 300, but
7 then I am trying to ascertain is that the only part of the
8 question you are objecting to?

9 MR SANTORA: Yes, your Honour.

12:56:49 10 PRESIDING JUDGE: You are not objecting to the reference to
11 a battalion of a thousand?

12 MR SANTORA: No, I am not objecting to that portion. If I
13 understand, I haven't heard him quote - say anything with regards
14 to the evidence on that portion.

12:57:05 15 PRESIDING JUDGE: Mr Anyah?

16 MR ANYAH: I believe I heard both, but I will try and find
17 it as we go along, but I can ask the witness again:

18 Q. Madam Witness, how many fighters, or persons, made up the
19 new Red Lion battalion? Can you give us an approximate number?

12:57:27 20 A. 300.

21 Q. Thank you. So I go back to my question. While you were at
22 Koinadugu, at any time while you were there were you aware of a
23 battalion of the size of about a thousand men being formed while
24 you were there?

12:57:50 25 A. No.

26 Q. Was Nya Korto, Foday Lansana, in Koinadugu when you were
27 there?

28 A. Yes.

29 Q. Foday Lansana was there. Was Gullit there, Alex Tamba

- 1 Bri ma?
- 2 A. No.
- 3 Q. Gullit was not there. Is that your evidence?
- 4 A. I did not see him.
- 12:58:25 5 Q. Have you heard the name Brigadier Mani before?
- 6 A. Yes.
- 7 Q. Was Brigadier Mani there, Madam Witness, in Koinadugu?
- 8 A. I can't recall.
- 9 Q. While you were in Koinadugu did any reinforcements of
- 12:58:52 10 fighting men arrive from Rosos to Koinadugu?
- 11 A. No.
- 12 Q. Well, let's go back a few pages from where I read about Nya
- 13 Korto's testimony on 22 February 2008, page 4527, starting at
- 14 lines 27. Madam Witness, this is CO Nya talking about
- 12:59:52 15 reinforcements being sent to Koinadugu. Actually line 27 is an
- 16 answer, so I will just start at line 24 with a question:
- 17 "Q. When I say what are you referring to, in particular
- 18 what are you referring to when you say 'when Gullit
- 19 requested for reinforcement'?
- 13:00:22 20 A. Okay, reinforcement is the giving of additional troops
- 21 for operation. It could also be arms and ammunition, or
- 22 manpower.
- 23 Q. Did Gullit request for reinforcement at any point?"
- 24 Over to the next page, page 4528, answer by CO Nya:
- 13:00:49 25 "A. Yes, it was upon our arrival in Koinadugu that Gullit
- 26 requested for a battalion strong manpower for Rosos
- 27 operation.
- 28 Q. What happened after this request?
- 29 A. Superman, SAJ Musa, Brigadier Mani, General Bropleh and

1 Colonel Tamba Yamba made it possible to organise a
2 battalion strong manpower with some equipment, AK
3 ammunition, G3 ammunition, GPMG ammunition and these were
4 sent to Gullit at Rosos."

13:01:36 5 PRESIDING JUDGE: Just pause, Mr Anyah. Your original
6 question, page 84, line 5 and 6, is men arriving from Rosos, not
7 to Rosos.

8 MR ANYAH: I understand, but the paragraph I have just
9 read, which was really the key point on line 1, which says, "Yes,
13:01:55 10 it was upon our arrival in Koinadugu that Gullit requested for a
11 battalion strong manpower for Rosos operation."

12 PRESIDING JUDGE: Yes, to go to Rosos, but you are
13 questioning her about people coming from Rosos.

14 MR ANYAH: Oh, I see. I understand the distinction:
13:02:14 15 Q. Madam Witness, the point is this: You have told us you
16 were not aware that Gullit was present in Koinadugu at the time,
17 right?

18 A. Yes.

19 Q. You have told us that while you were in Koinadugu no
13:02:35 20 battalion of about a thousand men was formed while you were
21 there, yes?

22 A. Yes.

23 Q. On the same page I was reading, from Nya's testimony, on
24 line 21 he was asked this question and he gave these responses:

13:02:56 25 "Q. You said that Superman, SAJ Musa, Brigadier Mani and
26 General Bropleh and Colonel Tamba Yamba made it possible to
27 organise a battalion strong manpower. Did you actually see
28 this battalion?

29 A. Yes.

1 Q. Where did you see them?

2 A. They were assembled in Koinadugu before they departed.

3 Q. Can you describe the composition of this battalion?

4 A. Yes, as far as I am concerned there were about 1,000 in
13:03:35 5 number."

6 Over to the next page, 4529:

7 "Q. Who was in the battalion?

8 A. O-Five was the overall commander selected in order to
9 lead this particular battalion to Rosos."

13:03:57 10 On the next line it speaks of CY and Jumbo Blah who joined
11 O-Five for this particular operation and for the signal unit the
12 names you mentioned to us, Madam Witness, Major Alfred Brown and
13 you see Captain King Perry. Now, CO Nya is telling the Court
14 that while he was in Koinadugu a battalion constituting of about
13:04:18 15 a thousand men was formed. Do you agree or disagree with that,
16 Madam Witness?

17 A. I don't know about that, because CO Nya had been in
18 Koinadugu before I arrived there, so I don't know whether the
19 battalion was formed prior to my arrival there. So I don't know
13:04:40 20 about that.

21 Q. And the paragraph I read you previously where CO Nya said
22 the Red Lion battalion was considered the bodyguard unit of
23 Superman and SAJ Musa, you will see that he is indicating that
24 that Red Lion battalion was part of this 1,000 men that was
13:05:09 25 constituted under O-Five. I will read it again, line 17 on that
26 page, 4529, still the same page and it is Mr Santora asking the
27 question:

28 "One more question at this point, Mr Witness. You said
29 that CY and Jumbo Blah were delegates from other platoons that

1 joined 0-Five. Do you know what other platoons they were from?"

2 A. If I can talk about that, CY and Jumbo Blah were Superman's
3 bodyguards, but within that bodyguard unit, like any other unit
4 in the RUF, you will at the same time fall within a platoon, or a
13:06:01 5 company, or a squad, but I knew that they were Superman's
6 bodyguards. I did not know the platoon under which they fell.

7 Q. Well, King Perry was in Koinadugu at the time, yes, Madam
8 Witness?

9 A. Yes.

13:06:25 10 Q. A radio operator, also known as Perry Kamara, right?

11 A. That was King Perry, yes.

12 Q. Also this February King Perry Kamara was before this
13 Chamber speaking about Koinadugu and the Red Lion battalion,
14 saying what Nya Korto was here. Let's see what Perry Kamara has
13:06:55 15 to say about the Red Lion battalion. The transcript in question
16 is from 6 February 2008, page 3187. Madam Witness, Perry Kamara
17 was asked these questions and he gave these responses on 6
18 February, line 27. Let me see which counsel was asking this

19 question. Mr Bangura, counsel for the Prosecution, 27, "Can we
13:07:36 20 just go over again who the Red Lion battalion were and who the
21 Cobra Unit were?" Perry Kamara answers, "The Red Lion battalion
22 comprised Komba Gbundema's bodyguards. They formed the Red Lion
23 battalion. The Cobra unit was Superman's bodyguards. They
24 comprised that unit."

13:08:05 25 "Q. Together these two units formed the RUF contingent, is
26 that right?

27 A. Yes.

28 Q. And apart from these there was an STF unit as well, is
29 that correct?

1 A. Yes, we had STF among us."

2 Perry Kamara is suggesting that Komba Gbundema's bodyguards
3 and Superman's bodyguards made up the Red Lion battalion. Do you
4 agree, Madam Witness?

13:08:48 5 A. I disagree. I know that Komba's bodyguard unit and
6 Superman's bodyguards, who also had the name Cobra Unit, they
7 were also amongst the Red Lion battalion.

8 Q. Well, I see the Prosecution perhaps has some concerns maybe
9 how I put the evidence, so let's go to another portion of
13:09:19 10 Kamara's testimony to see if there is some clarification. Page
11 3233 of the same 6 February 2008 evidence by Perry Kamara. He
12 was asked this question and he gave this response, Madam Witness
13 - that's is 3233, line 15:

14 "Q. How were the groups composed, the groups that operated
13:09:46 15 within Freetown?

16 A. We are all fighters. There was the AFRC, RUF and the
17 STF and each of these groups belonged to certain groups,
18 because anywhere you will see thousands of fighters they
19 must have units. As I stated earlier, from the time we
13:10:12 20 left Koinadugu I said in this group we had one unit which
21 was the - which dominated the RUF group. I am not talking
22 about the AFRC. This group, it was two groups, but one of
23 these two groups dominated the whole group. We called that
24 one Red Lion. Red Lion was a battalion on its own which
13:10:40 25 comprised Komba Gbundema's bodyguards".

26 This is what Perry Kamara told the Court on 6 February
27 2007. It goes on to say:

28 "They formed that unit, but it was RUF. They overwhelmed
29 the Cobra Unit and so all of the RUF fighters fell under Red Lion

1 battalion, but we were all RUF".

2 Perry Kamara is saying Red Lion was comprised of Komba
3 Gbundema's bodyguards. Do you agree, Madam Witness?

4 A. No.

13:11:27 5 Q. Perry Kamara suggests that this was a significantly large
6 group of fighters. In his response he uses the words "thousands
7 of fighters"?

8 MR SANTORA: Objection.

9 PRESIDING JUDGE: Yes, Mr Santora.

13:11:51 10 MR SANTORA: I am going to object that that misstates the
11 evidence in terms of what the transcript - where this witness,
12 not this witness in court, the witness that counsel is referring
13 to was referring to thousands of fighters, I don't believe that
14 that reference is in reference to the particular unit that
13:12:10 15 counsel is suggesting that it's part of. I don't know if I made
16 that clear or not.

17 MR ANYAH: I understand.

18 PRESIDING JUDGE: Mr Anyah, have you got the full citation
19 we are taking those words out of?

13:12:23 20 MR ANYAH: Yes, I gave it before. It's page 3233, 6
21 February 2007 transcript. I understand counsel's objection but
22 you will see how I phrased my question.

23 JUDGE SEBUTINDE: Mr Anyah, I think is transcript was 2008.

24 MR ANYAH: Yes.

13:12:36 25 JUDGE SEBUTINDE: But you said 2007.

26 MR ANYAH: It's Friday, Justice Sebutinde. I apologise.
27 Madam President, to respond to the objection, I think I phrased
28 my question carefully enough not to overstep or misstate the
29 evidence of Perry Kamara.

1 PRESIDING JUDGE: Have you already quoted it? Let me get
2 the line if you have so I can compare it and I can rule on this
3 objection.

4 MR SANTORA: My concern is - it's line 17 is where this
13:13:11 5 should start, because that is the reference to the thousands of
6 fighters. Line 17 of the transcript of --

7 PRESIDING JUDGE: Of the former transcript of February?

8 MR SANTORA: Yes, your Honour.

9 MR ANYAH: Yes, your Honour, 6 February, the page is 3233
13:13:27 10 and the answer of Perry Kamara starts at line 17.

11 PRESIDING JUDGE: Put it in full, Mr Anyah, because I don't
12 have it in full and in fairness to the witness I would like it in
13 full.

14 MR ANYAH:

13:13:42 15 Q. Well, Madam Witness, do you agree or disagree that the
16 total number of persons who formed this Red Lion battalion was
17 close to a thousand?

18 A. I disagree.

19 Q. Have you ever heard the name of Striker, Madam Witness?

13:14:12 20 A. Yes.

21 Q. Where did you hear that name, Madam Witness?

22 A. I heard that name in many places.

23 Q. Did you ever hear it in the context of the Red Lion
24 battalion, Madam Witness?

13:14:41 25 A. Yes.

26 Q. And what did you specifically hear about Striker vis-a-vis
27 or in connection with the Red Lion battalion?

28 A. I did not hear anything about him.

29 Q. Are you aware Perry Kamara told us Striker was the

1 commander of the Red Lion battalion?

2 A. I wouldn't know, because I was not there when he was
3 talking and he did not tell me.

4 Q. Perry Kamara says on the same transcript of 6 February at
13:15:25 5 page 3239 starting with the question on line 8, the question by
6 Mr Bangura, "Could you go back, Mr Witness?" Answer by Perry
7 Kamara: "Striker who was the Red Lion's commander, Red Lion
8 battalion commander".

9 So Perry Kamara is saying Striker was the commander and you
13:15:54 10 are saying 0-Five was the commander and Nya Korto says this force
11 of 1,000 men was commanded by 0-Five as well. Is that fair to
12 say, Madam Witness?

13 A. I am saying what I know and I know that it was 0-Five who
14 was the commander. Striker was Komba Gbundema's bodyguard unit
13:16:26 15 commander, but he was not a commander for the Red Lion battalion,
16 but he was also part of the Red Lion battalion, but it was 0-Five
17 that led the Red Lion from Koinadugu. That I know about.

18 Q. Another witness came before this Court and spoke at length
19 about the Red Lion battalion. I forget his nickname now, but his
13:16:56 20 real name is Alimamy Bobson Sesay. Bobson Sesay testified on 23
21 April. He told us that Gullit formed the Red Lion battalion.
22 For counsel's purposes the page in question is 8316.

23 Madam Witness, let me see, perhaps I should read it to you.
24 Yes. 8316, Bobson Sesay, 23 April, starting at line 3:

13:17:55 25 "Q. First, can you tell the Court how it is the group came
26 to be called the Red Lion battalion?

27 A. When they came from Koinadugu to reinforce us, that was
28 the name they had, Red Lion. They had their own section
29 within the 0-Five group that came. They referred to

1 themselves as Red Lion. When they came, Gullit established
2 that Red Lion - that group to a battalion. He called them
3 the Red Lion battalion."

4 Bobson Sesay is saying when the group from Koinadugu came
13:18:34 5 to join them, and you will see in the transcript he means at
6 Colonel Eddie Town, that's when Gullit formed this battalion
7 called Red Lion. So he makes the distinction between the Red
8 Lion group first and when it was turned into a battalion. Do you
9 agree that the phrase "Red Lion battalion" came into existence
13:19:00 10 not at Koinadugu but at Colonel Eddie Town as Bobson Sesay
11 suggests?

12 A. I disagree.

13 Q. Well, let me show you where he says it came into being at
14 Colonel Eddie Town. That is on the transcript of 28 April 2008,
13:19:25 15 relevant pages 8758 and 8760. Same witness, Bobson Sesay. Well,
16 let me start at line 23 on page 8758. The question posed to
17 Sesay was:

18 "Q. I am going to restate my question. I will restate my
19 question, Mr Witness. My question is this. Of the 200
13:20:05 20 men, how many do you see came from the Red Lion battalion?

21 A. There were about 50 that came from the Red Lion group
22 and later they formed the Red Lion battalion on their
23 arrival at Colonel Eddie Town".

24 Here again Bobson Sesay makes the distinction between Red
13:20:30 25 Lion group and Red Lion battalion and he says 50 from the Red
26 Lion group formed the Red Lion battalion. Do you agree with
27 that, Madam Witness?

28 A. I disagree. I don't know if I will be allowed to explain?

29 Q. You can explain, Madam Witness?

1 A. I am saying to this Court that the Red Lion that moved from
2 Koinadugu was a battalion and it was not a group, because, as far
3 as I knew, within there there were several platoons and it is
4 four platoons that form a company and companies form battalions
13:21:15 5 and the amount that left Koinadugu was not a group. It was a
6 battalion. And it is possible that when they got to Rosos they
7 met some soldiers who were now ready to move with them, so they
8 would have summed up to another amount that joined them to move.
9 So I was not there at Rosos, but what I know is that from where
13:21:38 10 we were it was a battalion that left.

11 Q. You remember a few minutes ago I asked you a question, "How
12 many members were there of the old Red Lion battalion?" Your
13 response was that you were not trained to figure out the
14 distinctions between the memberships of platoons and the likes.
13:21:57 15 Do you remember telling me that you could not know the
16 differences between battalions and platoons and it was not your
17 assignment in the RUF to know such things, Madam Witness?

18 A. I not say I did not say I did not know difference --

19 MR SANTORA: Objection.

13:22:13 20 PRESIDING JUDGE: Pause please, Madam Witness.

21 MR SANTORA: Again I am going to object on a misstatement.
22 I believe the witness was referring to a particular composition
23 or a number of a particular unit and I believe counsel said that
24 she was not trained to figure out distinctions as a general
13:22:30 25 matter.

26 MR ANYAH: My recollection of the witness's evidence when I
27 posed that question in the first instance was she suggested to
28 this Court that matters of that nature, ascertaining the number
29 of members that make up groups like platoons and battalions was

1 not her area of expertise. That's what she suggested.

2 PRESIDING JUDGE: I have a handwritten note that she said
3 she couldn't tell the number that comprised a battalion, but let
4 us get a proper record.

13:23:08 5 JUDGE SEBUTINDE: It is page 87, line 14.

6 MR ANYAH: I don't know if that is exact.

7 PRESIDING JUDGE: [Microphone not activated].

8 MR ANYAH: Well, I can't find the reference. I am going
9 from memory and it is not central to my --

13:24:43 10 PRESIDING JUDGE: Madam Witness - just pause, Mr Anyah, the
11 witness has her hand up and there may be something concerning
12 her. Yes, Madam Witness?

13 THE WITNESS: I just want to say something about the topic
14 that he was saying that I don't know. I said - he asked me
13:25:06 15 whether Superman's bodyguards who were in the Red Lion battalion
16 or platoons and I told him that Superman's bodyguards themselves,
17 whether they were bodyguards they must be - they must fall under
18 a platoon, or a company, or a unit, but I said I did not know the
19 platoon that these bodyguards belonged to and that the numbers
13:25:34 20 that formed these groups within the RUF I did not know, because
21 no list was given to me at any point in time that it is this
22 number of people that have moved from this position to another
23 point. But I told him that those who were responsible for that
24 would know the names and if they are asked, they will be able to
13:25:56 25 answer that, but that was not my job. So I did not know who was
26 number 1, or number 2, or number 3 amongst a platoon that was
27 leaving a particular position to another location. So that was
28 not my job in the RUF. That is what I am trying to clarify. But
29 I know the manpower that comprises a platoon, or a battalion, at

1 a point in time.

2 PRESIDING JUDGE: Mr Santora, your witness has dealt with
3 your objection. Please proceed, Mr Anyah.

4 MR ANYAH: Yes, Madam President. I am trying to find where
13:26:34 5 I was before all of this:

6 Q. Madam Witness, I had put a proposition to you that derives,
7 in our view, from Bobson Sesay's evidence and the proposition
8 was, "Bobson Sesay made a distinction between the Red Lion group
9 and the Red Lion battalion and he says 50 from the Red Lion group
13:27:05 10 formed the Red Lion battalion, do you agree with that
11 proposition?" Your answer was that you disagreed, yes?

12 A. Yes.

13 Q. Now, I had proposed to you that Sesay told the Court that
14 the Red Lion battalion was formed at Colonel Eddie Town and not
13:27:28 15 at Koinadugu as you suggest. Let me read you the relevant
16 portion of Sesay's evidence. The same transcript we were reading
17 from, 28 April 2008, the relevant page in question being - well,
18 I will start at 8759, the last line, line 29 and on to 8760. 29,
19 the question stated reads, "Are you saying the Red Lion
13:28:09 20 battalion?" Then Sesay answers on the next page:

21 "I said that later came and turned into the Red Lion
22 battalion because on their arrival of this group that was led by
23 O-Five at Colonel Eddie Town, it was from amongst them that
24 Gullit said that they should form the Red Lion battalion and it
13:28:32 25 was at Colonel Eddie Town that it happened."

26 Now, Bobson Sesay is saying Gullit was the one who formed
27 the Red Lion battalion. You are saying it was Superman. Do you
28 disagree with what Bobson Sesay suggested to this Court?

29 A. I disagree in relation to what I know.

1 Q. Reading on you will see --

2 PRESIDING JUDGE: Sorry to interrupt you, Mr Anyah, but I
3 have my eye on the time and we are just about up to the lunchtime
4 break. Is this your last question on this aspect of the
13:29:14 5 evidence, or will you be continuing in this line?

6 MR ANYAH: I will be continuing.

7 PRESIDING JUDGE: In the circumstances I would suggest this
8 is an appropriate time to adjourn.

9 MR ANYAH: Yes, that is fine. Very well, thank you.

13:29:25 10 PRESIDING JUDGE: Madam Witness, as you know, we break for
11 lunchtime now. However, today is Friday and on Friday afternoons
12 we do other work and so we will not be resuming this afternoon.
13 We are adjourning until Monday morning. I again remind you, as I
14 have done every other day, that whilst you are under oath you
13:29:50 15 must not discuss your evidence with anyone else. Do you
16 understand?

17 THE WITNESS: Yes, ma'am.

18 PRESIDING JUDGE: Very well. Please adjourn court until
19 Monday morning at 9.30.

13:30:04 20 [Whereupon the hearing adjourned at 1.30 p.m.
21 to be reconvened on Monday, 23 June 2008 at
22 9.30 a.m.]

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I N D E X

WITNESSES FOR THE PROSECUTION:

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