



Case No. SCSL-2003-01-T

THE PROSECUTOR OF  
THE SPECIAL COURT  
V.  
CHARLES GHANKAY TAYLOR

TUESDAY, 26 AUGUST 2008  
9.30 A.M.  
TRIAL

TRIAL CHAMBER II

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Before the Judges:

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

For Chambers:

Mr William Romans  
Ms Sidney Thompson

For the Registry:

Ms Advera Kamuzora  
Ms Rachel Irura

For the Prosecution:

Mr Nicholas Koumjian  
Ms Leigh Lawrie  
Ms Maja Dimitrova

For the accused Charles Ghankay  
Taylor:

Mr Courtenay Griffiths QC  
Mr Terry Munyard

1 Tuesday, 26 August 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:28:04 5 PRESIDING JUDGE: Mr Interpreter, I'm hearing you when I  
6 should be hearing a different voice. Could you please check the  
7 channels. Is anyone else having that problem? Yes, that's a  
8 universal problem, Mr Interpreter. Could you please check the  
9 channels.

09:28:28 10 If there are no other matters, I will proceed to remind the  
11 witness of his oath and we will continue cross-examination. For  
12 purposes of record I will confirm we're still in private session.

13 MR MUNYARD: Does your Honour want to take representation  
14 first?

09:28:52 15 PRESIDING JUDGE: Oh, indeed. I note changes of  
16 appearance, Mr Koumjian.

17 MR KOUMJIAN: Yes, good morning, your Honours. Joining us  
18 today is Leigh Lawrie and I remain, Nicholas Koumjian, for the  
19 Prosecution. Thank you.

09:29:06 20 PRESIDING JUDGE: Thank you for the reminder, Mr Munyard.

21 MR MUNYARD: Madam President, for the Defence there's  
22 Courtenay Griffiths QC and myself, Terry Munyard.

23 PRESIDING JUDGE: Thank you. Mr Witness, I again remind  
24 you this morning that you have taken the oath, the oath is still  
09:29:25 25 binding on you and you must answer questions truthfully. Do you  
26 understand?

27 THE WITNESS: Yes.

28 WITNESS: TF1-375 [On former oath]

29 PRESIDING JUDGE: Mr Munyard, please proceed.

1 MR KOUMJIAN: I just see we're not yet in private session.

2 PRESIDING JUDGE: Oh, are we not? [Microphone not  
3 activated].

4 [At this point in the proceedings, a portion of  
5 the transcript, pages 14531 to 14634, was  
6 extracted and sealed under separate cover, as  
7 the proceeding was heard in private session.]

09:29:43

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1 [Open session]

2 MS IRURA: Your Honour, we are in open session. It is  
3 possible to have the documents on the ELMO without them being  
4 broadcast if the booth is so instructed.

14:57:26 5 MR MUNYARD: I don't know if the Court wants to confer  
6 about that, because I'm content with the procedure that is I  
7 think being proposed by Justices Sebutinde that I ensure that the  
8 first part of the title page or any part of the page that  
9 includes the name is not shown on the screen which I believe can  
14:57:46 10 be done because the screen only broadcasts that part which falls  
11 within what I will call the highlighted part of the screen.

12 PRESIDING JUDGE: Yes, as I said, if and when it arises we  
13 will deal with it in that way, Mr Munyard.

14 Just for purposes of clarification and record we are now in  
14:58:56 15 open session.

16 MR MUNYARD: Thank you.

17 MR KOUMJIAN: Perhaps the witness could just be reminded of  
18 that, because he has before used names that he now should be told  
19 not to use.

14:59:11 20 PRESIDING JUDGE: Mr Witness, you understand that the  
21 private session where the public cannot hear is now finished. We  
22 are back in the open session so I remind you first of all to be  
23 careful not to mention your own name, or other names that could  
24 identify you, and also to take care that you do not disclose  
14:59:31 25 where you presently - your precise present address.

26 MR MUNYARD: Thank you:

27 Q. I would like to start with the first occasion on which you  
28 were seen by the Prosecution, tab 19 of the bundle, please.

29 JUDGE SEBUTINDE: Now, Mr Munyard, I think you have to

1 switch your microphone on and off.

2 MR MUNYARD: Your Honour, I will try and remember. I hope  
3 I will be reminded if I forget. Can I say there is no danger  
4 with this document because it refers to the TF1 number only:

15:00:42 5 Q. Now this document, Mr Witness, is a record of all the money  
6 that was paid to you by the Prosecution and each paragraph deals  
7 with a different amount of money that was given to you and the  
8 reason it was given.

9 If we look at paragraph 1 - I'm not sure, your Honour, if  
15:01:29 10 the first two paragraphs - in fact looking at the document now  
11 the first two paragraphs don't have the witness's TF1 number.  
12 The third one does. But on a copy of it that was supplied to us  
13 it is marked TF1-375 in handwriting at the top. I don't think  
14 there will be any dispute that it is indeed this witness's  
15:01:54 15 disbursements.

16 Now, the first paragraph, Mr Witness, shows that on 9  
17 September 2005 you were seen by the Prosecution and you were  
18 given 50 United States dollars for information, investigative  
19 assistance. Do you remember being given 50 US dollars on 9  
15:02:24 20 September 2005 for giving information to the Prosecution?

21 A. No, I don't remember that they gave me 50 US dollars for  
22 giving statements.

23 Q. Are you disputing that you were given 50 US dollars for  
24 giving them information in September 2005?

15:02:52 25 A. Yes, I agreed that they did not give me \$50 US for giving  
26 them information.

27 Q. Well, that's what it says here, isn't it?

28 A. No, I recall that they gave me \$50 US, but it was not for  
29 information. They gave me, according to them, for transportation

1 because they had wasted my time.

2 Q. Well, just turn over the page for a moment, if you would,  
3 and have a look at box number 6. There you were given 25 US  
4 dollars for transport/lost wages. So when they give you money  
15:03:48 5 for transport they say so, don't they?

6 A. I don't know.

7 Q. Back to paragraph number 1. 50 US dollars for information  
8 for investigative assistance. This was the occasion, was it,  
9 when your friend, Varmuyan Sherif, tricked you into going to meet  
15:04:21 10 them at the Boulevard Hotel in Monrovia? Is that right?

11 A. They did not give me 50 US dollars for investigation  
12 assistance. They told me that, "We have given you this \$50  
13 because you have wasted your time for the whole day, so have this  
14 to go and enhance yourself".

15:04:45 15 Q. They gave you - they spent the whole day with you, is that  
16 right?

17 A. No, they did not give it to me because they spent the whole  
18 day with me. They gave it to me because they said it was for  
19 transport and that they had wasted my time. They said it was for  
15:05:05 20 that and they said, "Because we have wasted your time here is  
21 \$50. You can use this as transport and the other you can be able  
22 to recover for what you have not been able to do today".

23 Q. "They told me that, 'We have given you this \$50 because you  
24 have wasted your time for the whole day'" is the answer that you  
15:05:25 25 gave me initially. Did you waste your time for the whole day  
26 seeing them in September 2005?

27 A. I did not spend the whole day with them, but I spent a long  
28 time with them.

29 Q. Right. This is an occasion when they made notes of what

1 you were telling them, but didn't read those notes back to you,  
2 yes?

3 A. Yes, they did not read the notes back to me.

15:06:03

4 Q. What information were you giving to them on that first  
5 occasion?

6 A. The information that they asked me about that I knew it was  
7 necessary for me to answer at the time. That was the information  
8 I gave to them.

9 Q. Yes, what was the information?

15:06:25

10 A. I am unable to remember everything, but they asked me about  
11 my connection, whether I was the [Redacted].

12 Q. Right. And what did you say?

13 A. I said no. I said I did not think I was the person you  
14 were talking about.

15:06:46

15 Q. Well, that wouldn't take the whole day, would it?

16 A. No, they did not spend the whole day with me, no.

17 Q. How many hours were you with them on this first occasion  
18 when you get 50 US dollars?

19 A. I spent up to three or four hours with them.

15:07:07

20 Q. Right. We have dealt with question 1, "Are you  
21 [Redacted]?" "No, I am not". What was the rest of the two hours  
22 and 55 minutes spent discussing?

23 A. I can't remember all that we discussed there. I can't.

15:07:35

24 Q. Well, did you give them some information, whether it was  
25 true or false, on that occasion during those three hours?

26 A. Yes, I gave them some false information when they asked me  
27 and I said indeed, that some were true, but some were false.

28 Q. Can you tell us what the true ones were that you told them?

29 A. I can't remember.

1 Q. Try, please.

2 A. I can't remember. There is no way I can try.

3 Q. Help us with the false things that you told them.

4 A. I don't remember all the first one, the second one, or the

15:08:26 5 last one, except if you can help me, please.

6 Q. What name did you give them?

7 A. Joseph Kamara.

8 Q. Now, is this the occasion where you tell them, "I am called

9 [Redacted] but I'm not" --

15:08:46 10 MR KOUJIAN: Excuse me.

11 MR MUNYARD: Sorry, can we redact?

12 PRESIDING JUDGE: Can I have a redaction of that last name,

13 please.

14 MR KOUJIAN: Can I just assure the witness that there is

15:08:58 15 no-one in the audience and it's being redacted so it will not be

16 broadcast.

17 PRESIDING JUDGE: You have the benefit of --

18 MR KOUJIAN: We've checked and there is no-one except for

19 a security guard sitting in the audience.

15:09:14 20 PRESIDING JUDGE: Also, if there are any monitors listening

21 from the monitor booths, the word or the name last mentioned is

22 not to be repeated or broadcast in any of the reports.

23 Mr Witness, a word almost - a name was almost mentioned,

24 but we are having that name deleted from the records and there is

15:09:31 25 no-one outside listening. You understand?

26 THE WITNESS: Yes, but I think he is calling my name

27 deliberately.

28 PRESIDING JUDGE: I don't think he is. I don't think any

29 counsel would be malicious in that way. We have been in a

1 private session. It is easy to slip into error. Please be  
2 reassured that we are all very conscious of your security,  
3 Mr Witness.

4 MR MUNYARD: I do apologise. It was, as I think is obvious  
15:10:03 5 to everybody - it was entirely accidental and I am simply going  
6 on answers that the witness - I'm pursuing answers the witness is  
7 giving. I can put it easily in another way:

8 Q. Did you tell them your nickname, but also at the same time  
9 tell them that more than one person had that same nickname?

15:10:29 10 A. I did not tell them the nickname. They were the ones who  
11 asked saying, "Is this not your nickname", and I said yes. They  
12 called me a similar name like this, I said but maybe there are  
13 other people who carry this same name.

14 Q. Right. So you gave them a false real name; you gave them -  
15:10:52 15 you confirmed your nickname being the same as somebody else who  
16 had that nickname?

17 A. Yes, I accepted that the nickname was my name, but maybe  
18 some other person was carrying that name so I did not think I was  
19 the right person they were looking out for.

15:11:12 20 Q. Right. And so what else were you able to help them with if  
21 you weren't the right person they were looking for?

22 A. After I said that they told me they will get on to me  
23 again. I think that was the only answer that I gave to them.  
24 They asked me whether I would be willing for them to get on to me  
15:11:36 25 again, I said yes, so I thought that was the only answer I could  
26 have given to them for them to be happy.

27 Q. Right. And for that they give you \$50 - US dollars - for a  
28 couple of names and agreeing that they could get back to you,  
29 yes?

1 A. No, I don't know whether it was for that that they gave me  
2 the \$50, because they did not utter that. They did not say  
3 because of this or that we will give you \$50. The only thing  
4 they told me was that, "We will give you 50 US dollars for you to  
15:12:11 5 pay your return fee up to where you came from and because we have  
6 wasted your time for some hours for you to be able to enhance  
7 yourself".

8 Q. Well, you hadn't come from anywhere, had you, because you  
9 told us that your friend, Varmuyan Sheriff, had simply asked you  
15:12:27 10 to go with him to the hotel?

11 A. Yes, yes.

12 Q. So you had just gone down the road to the hotel with  
13 Varmuyan Sheriff, hadn't you?

14 A. I did not say I came from anywhere. I was right around  
15:12:51 15 there, but I did not specify to them whether I flew or I used  
16 motorbike or I used gas to put into my motorbike.

17 THE INTERPRETER: Your Honours, the tail end of the  
18 witness's testimony was not clear to the interpreter.

19 PRESIDING JUDGE: Mr Witness, the interpreter did not hear  
15:13:08 20 the last part of your evidence. Please repeat where you said,  
21 "Or I used gas to put into my motorbike". Continue from there,  
22 please.

23 THE WITNESS: I said - I told you earlier before, I said I  
24 was right around there when Varmuyan Sheriff called me, but I did  
15:13:31 25 not specify whether I flew to go to the hotel or whether I walked  
26 or whether I used the motorbike to put gas inside. I did not  
27 specify, except if you ask me now maybe I will be able to answer  
28 how I managed to get there.

29 MR MUNYARD:

1 Q. You were - you've already told us that you were working on  
2 Ellen Johnson-Sirleaf's election campaign with your friend,  
3 Varmuyan Sheriff, at this time, or have you forgotten telling us  
4 that?

15:14:04 5 A. I did not forget saying that.

6 Q. And as you've just said, "I was right around here, but I  
7 didn't specify to them." So you were there in Monrovia when  
8 Varmuyan Sheriff tricked you into going into the hotel to meet  
9 what turned out to be the Prosecution. That's correct, isn't it?

15:14:31 10 A. Yes, I was in Monrovia. Yes.

11 Q. So on your account the record that they have made that we  
12 have just looked at in paragraph 1, 50 US dollars for  
13 information, is wrong, it was actually for transport, although  
14 you hadn't had any transport costs, had you?

15:14:57 15 A. How did you know that I did not have transport costs? I  
16 had transport costs.

17 Q. You have just told us you were right around there anyway  
18 and you didn't tell the Prosecutors whether you'd flown there or  
19 walked there or used your motorbike to get there. They just hand  
15:15:17 20 you a nice, flat \$50 for your transport, without bothering to  
21 enquire whether it had cost you 50 Liberian or 50 US or even one  
22 cent. That's right, isn't it?

23 A. Yes, they did not find out, but I knew that they knew  
24 within themselves that when they go to Monrovia anywhere they go  
15:15:42 25 today they would pay transport, so myself I would not just - I  
26 would not fly to go and meet them. I will have to pay transport.

27 Q. For giving them a false name and deceiving them about your  
28 nickname you were very handsomely rewarded with 50 United States  
29 dollars, weren't you?

1 A. Yes, because that is what makes them professionals.

2 THE INTERPRETER: Your Honours, could the witness be  
3 audible whilst speaking.

4 PRESIDING JUDGE: Mr Witness, you must come closer to the  
15:16:18 5 microphone and speak more clearly because the interpreter is  
6 having great trouble hearing you. Mr Interpreter, did you get  
7 all of the last answer?

8 THE INTERPRETER: No, no, your Honours.

9 PRESIDING JUDGE: Mr Witness, you said, "That is what makes  
15:16:32 10 them professionals". Please continue from there.

11 MR KOUMJIAN: I am just wondering if the mic could be  
12 brought any closer to the witness.

13 MR MUNYARD: I think actually the chair - if the witness's  
14 chair is pushed forward, the mics have a rather limited amount of  
15:16:49 15 cable on them in my experience.

16 THE WITNESS: Yes, please ask your question again.

17 MR MUNYARD:

18 Q. I'd asked my question and you answered it. That is what  
19 makes them professionals that they handsomely rewarded you with  
15:17:31 20 50 United States dollars for giving them a false name and  
21 misleading them about your nickname and agreeing to see them  
22 again. You were paid by the Prosecution for giving them  
23 worthless information that day, weren't you?

24 A. They did not pay me for giving them worthless information.  
15:17:57 25 They did not pay me to give them false name or - they told me  
26 that the \$50 was not a payment, "But we are giving you because we  
27 have detained you here, we have delayed you and we know you are a  
28 big man for yourself - you want to do something for yourself so  
29 that you will be able to pay your way with this to and from".

1 They did not know where Varmuyan Sheriff picked me up, but I knew  
2 where he picked me up, but they did not know how I managed to go  
3 there. Maybe I took plane to go and meet them. They did not  
4 know. I was the one who knew.

15:18:33 5 Q. Yes. How much did it cost you to go with Varmuyan Sheriff  
6 to see the Prosecution that day? Did you walk there?

7 A. I used my motorbike.

8 Q. With him on the back?

9 A. Yes, Varmuyan Sheriff on the back. Yes.

15:18:57 10 Q. And how many minutes travel was involved?

11 A. It was not a far distance. I think we just spent up to  
12 five minutes.

13 Q. Thank you. Have you ever been paid \$50 for spending that  
14 small amount of gas in your motorbike before?

15:19:28 15 A. Yes, they have been giving me gas more than that before.

16 In fact, it was my entitlement to get gas in Liberia at the time  
17 the Taylor government was running, so I have been experiencing  
18 that. I have been having entitlement for that, for gas

19 Q. Mrs Johnson-Sirleaf was running the government in September  
15:19:52 20 2005, wasn't she?

21 A. I don't think so. She was just a candidate for a party, a  
22 political party.

23 Q. But it certainly wasn't Mr Taylor, was it?

24 A. No, it was not Mr Taylor. I think it was Gyude Bryant.

15:20:14 25 MR KOUMJIAN: Excuse me, going back to the question that  
26 counsel seems to be addressing, the question was, "Have you ever  
27 been given that amount of money for such a small amount of gas  
28 before?" There was no limitation on the time period. That is  
29 lines 18 and 19.

1           PRESIDING JUDGE: I don't understand your objection,  
2 Mr Koumjian.

3           MR KOUMJIAN: I will wait for the next question, thank you.

4           PRESIDING JUDGE: Thank you.

15:20:41 5           MR MUNYARD:

6 Q. Right. \$50 that day. You see them again in December.

7 What name did you give to them in December?

8           MR KOUMJIAN: Objection.

9           MR MUNYARD: Sorry, I am doing it again:

15:21:02 10 Q. Did you give them your correct name in December?

11 A. I don't remember giving them my correct name.

12 Q. Did you give them any information in December?

13 A. Yes, I met them, but I don't remember giving them the type  
14 of information.

15:21:30 15 Q. Where did you meet them in December?

16 A. I think that would be Royal Hotel or one of the hotels, but  
17 I don't actually remember the right hotel. I don't know. Crown,  
18 or hotel, I don't know.

19 Q. And in December when you went to see them, were had you  
15:22:05 20 travelled from then?

21 A. Ganta.

22 Q. And why did you go and see them again?

23 A. Somebody went and called me and said people wanted to see  
24 me. Somebody went and called me that people wanted to see me.

15:22:41 25           MR MUNYARD: I'm sorry, I have been slightly misled by the  
26 order of these receipts. I have been talking about December. I  
27 should have hopped to paragraph 3 first, because they are out of  
28 time sequence.

29           PRESIDING JUDGE: Yes.

1 MR MUNYARD:

2 Q. Forget what I said about December and we will go to  
3 November. In November did you go and see them?

4 A. I don't remember really except if you remind me.

15:23:13 5 Q. Well, were you still campaigning for Mrs Johnson-Sirleaf in  
6 November?

7 A. I think early November, yes, yes.

8 Q. Were you still in Monrovia?

9 A. No.

15:23:35 10 Q. Where were you in November?

11 A. I was in Ganta.

12 Q. How do you know?

13 A. At the time we were going for the second rounds and during  
14 the second rounds they sent me to Ganta to go and talk to the  
15 youths; the second rounds of the campaign.

16 Q. Who is "they"?

17 A. Aisha Conneh, Ellen Johnson-Sirleaf and the other party  
18 senior members.

19 Q. Right. So, you were in direct contact, were you, with  
15:24:11 20 Aisha Conneh and Ellen Johnson-Sirleaf?

21 A. Yes, I was in direct contact with them.

22 MR MUNYARD: I am forgetting everything this afternoon, I'm  
23 afraid:

24 Q. Who was Ellen Johnson-Sirleaf's principal bodyguard during  
15:24:42 25 the campaign?

26 A. One man who was called Silver Fox.

27 Q. What about Varmuyan Sherif? Was he one of her bodyguards?

28 A. Yes.

29 Q. Who is Aisha Conneh?

1 A. I understood that she was the wife of Sekou Damate Conneh,  
2 the war leader for LURD rebels. The rebel leader for LURD.

3 Q. And she was a family member of Lansana Conte's, the  
4 President of Guinea, wasn't she?

15:25:55 5 A. Even myself I heard that same joke, but I did not confirm  
6 it. I did not know actually.

7 Q. Are you saying it's a joke, Mr Witness?

8 A. I had the same understanding. When I say joke, it means I  
9 had a little knowledge about it. I was informed about it, but it  
10 was not confirmed to me properly in the way that I wanted it from  
11 herself.

12 Q. You have told us that you were in direct contact with Aisha  
13 Conneh and Ellen Johnson-Sirleaf. You would have been easily  
14 able to confirm that she was a member of the family of President  
15 Lansana Conte of Guinea and one of the principal backers of the  
16 LURD and Ellen Johnson-Sirleaf, wouldn't you?

17 A. Yes, I was in direct contact, but the direct contacts were  
18 not for her domestic affairs. I was only in direct contact with  
19 her for the campaign for her to be elected President. That was  
20 period.

21 Q. What about Abu Keita? What was his role?

22 A. Abu Keita, his role where? I don't understand.

23 Q. In either LURD or in supporting Ellen Johnson-Sirleaf in  
24 her campaign for the presidency?

15:27:42 25 A. I remember seeing Abu Keita, the Abu Keita that I know, the  
26 former Abu Keita, general for ULIMO, in Liberia. I remember  
27 seeing him in Liberia 2002, but since then I don't remember  
28 seeing him. That is the Abu Keita that I know, so I don't know  
29 about any other Abu Keita.

1 Q. Now Ellen Johnson-Sirleaf herself had been supporting LURD,  
2 hadn't she?

3 A. I don't have any knowledge about that, any one.

4 Q. Have you never heard that suggestion?

15:28:24 5 MR KOUMJIAN: Objection. First relevance to the question,  
6 "Have you ever heard that suggestion?"

7 PRESIDING JUDGE: What is the relevance, Mr Munyard? Your  
8 question has been challenged.

9 MR MUNYARD: I am dealing with the various people that we  
15:28:40 10 have heard of who were supporters of either ULIMO or LURD and  
11 this witness is clearly tied up with those very same people  
12 certainly by 2005.

13 PRESIDING JUDGE: Very well, I will allow the question.

14 MR MUNYARD: Thank you:

15:29:02 15 Q. Are you saying you had never heard the suggestion that  
16 Ellen Johnson-Sirleaf had been a supporter of the LURD against  
17 the government of Charles Taylor?

18 A. No, I did not hear that before.

19 Q. And who is Cobra?

15:29:39 20 A. I heard the name Cobra in Liberia after 2003. I think he  
21 was part of the LURD, but I did not know him in person.

22 Q. Who is Cobra's brother?

23 A. I don't know anything about Cobra's family issue.

24 Q. What is Varmuyan Sheriff's brother's name or nickname?

15:30:09 25 A. I don't know Varmuyan Sheriff's brother's name or nickname.  
26 I don't know anything about Varmuyan Sheriff's brother.

27 Q. When Varmuyan Sheriff persuaded you on that first occasion  
28 to go and meet with Prosecutors from this Court back in September  
29 2005, you knew perfectly well that it was the Prosecutors from

1 this Court and not some person from Ivory Coast that you were  
2 going to meet, didn't you?

3 A. No, I was not thinking that it was somebody from the Court  
4 that I was going to meet. I was not expecting that.

15:31:02 5 Q. And Varmuyan Sheriff made it clear to you that if you gave  
6 information to the Prosecution you would be well financially  
7 rewarded, didn't he?

8 A. No.

9 Q. And you were well financially rewarded by the Prosecution  
15:31:25 10 for the information you gave them, weren't you?

11 A. They gave me some money, but I was not satisfied with the  
12 money that they were even giving to me for some time.

13 Q. You mean 50 dollars for going round the corner was not  
14 enough?

15:31:54 15 A. I do not understand what you mean by around the corner.

16 Q. A five minute motorcycle ride to see the Prosecutors for  
17 which you were paid \$50, are you saying that wasn't enough and  
18 you weren't satisfied with it?

19 A. I was not satisfied with it.

15:32:12 20 Q. Is that why they doubled the amount the next time you saw  
21 them in November and gave you 100 US dollars that we can see in  
22 paragraph 3 of this record we have been looking at?

23 A. That was up to them, because I did not discuss money  
24 business with them. I didn't know why they doubled it, whether  
15:32:35 25 they subtracted it or they added it up. No, I don't know.

26 MR MUNYARD: Madam Court Officer, I think we will need the  
27 document back in front of the witness on the screen:

28 Q. Now box number 3, Saturday 19 November 2005, for  
29 information you are given 100 US dollars. You have told us that

1 you were living in Ganta, or staying in Ganta at that time. How  
2 long did it take you to travel from Ganta to where you were  
3 interviewed and back again?

4 A. How long, or how much? Please ask the question properly.

15:33:54 5 Q. I asked the question properly. I asked how long.

6 A. Up to two to three hours drive. Two or three hours drive  
7 to come. Up to six hours.

8 Q. On your motorcycle?

9 A. When I am using my motorcycle I can take exactly two hours  
15:34:21 10 to go, but if I was using taxi, because they will stop and take  
11 passengers, we would spend more than that.

12 Q. So which did you use?

13 A. I used a taxi.

14 Q. How do you now remember?

15:34:45 15 A. The same way I am remembering the other things that I have  
16 been talking about.

17 Q. How much did it cost?

18 A. \$10 US at the rate of 50 - 500 Liberian dollars.

19 Q. \$10 US for the return trip?

15:35:12 20 A. No, for one trip. Return trip would be \$20 US.

21 Q. How long did you spend with the Prosecution that day?

22 A. I spent one day with them. I spent a whole day with them.

23 Q. And then did you return to Ganta?

24 A. I slept in Monrovia. I didn't leave that same day.

15:35:44 25 Q. Did you have to pay for your accommodation in Monrovia or  
26 did you stay with one of your Johnson-Sirleaf campaign  
27 colleagues, or another friend?

28 A. I paid for my - I paid for a hotel.

29 Q. How much did that cost?

1 A. \$50.

2 Q. Which hotel did you stay in?

3 A. Yellow House by Paynesville.

15:36:48

4 Q. Just turn over, please, to box 10. Do you see box 10? Do  
5 you see that box, Mr Witness?

6 A. Yes.

7 Q. And what is amusing you about that?

8 A. I just feel like smiling. I know about the box.

15:37:19

9 Q. There when you were - when you had to spend money on  
10 accommodation and food it was spelled out that that was the  
11 reason why you were being paid \$100. That actually was for your  
12 family. That's right, isn't it?

13 A. Which of the dates? Yes, yes.

15:37:55

14 Q. Now go back to box 2, please. 3 December 2005. Where were  
15 you staying then?

16 A. You said 5 December, I have 3 December here, December 3rd.

17 Q. Yes, that is what I asked you about, 3 December 2005 was my  
18 question. Where were you staying then?

15:38:43

19 A. I can't remember my location at that time, because in  
20 December I was doing business, Ganta, Monrovia, Monrovia, Gbarnga  
21 and other places. I can't remember where I was at that time.

22 Q. Right. So it follows, therefore, that you don't know how  
23 much you had to spend to give further information to the  
24 Prosecution on Saturday, 3 December 2005, doesn't it?

15:39:13

25 A. I am unable to understand your question.

26 Q. If you don't know where you were in December 2005, that  
27 means you are not able to help us with the reason why the  
28 Prosecution paid you 100 US dollars for seeing them and giving  
29 them information on 3 December 2005, doesn't it?

1 A. The Prosecution did not pay me for any information. The  
2 Prosecution did not pay me. You are just making me to think that  
3 they were supposed to pay me. I was not paid. I'm not sure they  
4 can pay people to go and testify. Now I know that you are a good  
15:39:56 5 lawyer, you are trying to give me some ideas that they can pay  
6 people to go and testify. If I had known that they pay people to  
7 go and testify maybe I could have - I could have asked them, but  
8 at this time I hadn't any knowledge about payment. They were  
9 just telling me transport, go and eat, but I had no knowledge  
15:40:12 10 about payment to come and testify or give information. They told  
11 me that they were doing it for peace, that they will go and leave  
12 us in peace, justice. That was the only thing they were telling  
13 me. We, the white people, will go and leave you here, but you  
14 will have peace and justice, peace of mind, and stay in peace.  
15:40:30 15 That was the only thing they paid me with, that talk. They were  
16 not paying me with money.

17 Q. You may have been getting peace and justice, but you were  
18 certainly getting plenty of United States dollars from the  
19 Prosecution in September, November and December 2005, weren't  
15:40:51 20 you?

21 A. I think the money that I was getting from them they knew  
22 that I was supposed to be getting that money from them. That was  
23 why they were giving it to me, because I was willing to talk with  
24 them at any time, any minute, the time that I was willing. They  
15:41:06 25 were just giving me the money because they thought that I was  
26 supposed to get the money and I knew it was an agreement between  
27 all of us that I was supposed to get the money. That was why  
28 they were giving it to me. That was what I was thinking about.  
29 They were not paying me. When I asked - if I ask these people

1 for pay I don't think the Court will go on because I would ask  
2 them for plenty of money, you see.

3 Q. Did Varmuyan Sheriff tell you how much he was being paid by  
4 the Prosecution?

15:41:42 5 A. No.

6 Q. But you knew he was being paid as well as you, didn't you?

7 A. No.

8 Q. Is that an honest answer?

9 A. Maybe you can help me to answer it honestly.

15:42:09 10 Q. Right, box 4, Sunday 4 June 2006, again you are paid 100 US  
11 dollars for information by the Prosecution. Where were you on 4  
12 June 2006? Where were you staying then?

13 A. 4 June 2006, I was in Monrovia.

14 Q. And were you seen by the Prosecution in Monrovia?

15:42:50 15 A. Yes.

16 Q. So what's the hundred dollars for that day?

17 A. They gave me money and I accepted the money. I didn't know  
18 what it was for. They gave it me and I accepted it. I knew it  
19 was for the same transport purpose, but for the meantime take  
20 this amount of money. I can't remember what the money was for.

15:43:13

21 Q. But you've just told us you knew it was for the same  
22 transport purpose, so you do know what the money was for, don't  
23 you?

24 A. What I knew the money was for, that's why I said I knew  
15:43:39 25 that the money was for the same transport purpose. Maybe it  
26 could be for a different purpose, but they did not tell me that.

27 Q. How much had you spent on transport on that day when going  
28 to see the Prosecution within the very city that you were in?

29 A. I spent less than 3 dollars US or 4 dollars US, less than.

1 Q. And you saw them in a hotel that day, didn't you?

2 A. Yes.

3 Q. And you weren't with them for a terribly long time that  
4 day, were you?

15:44:30 5 A. Yes.

6 Q. And so you made a profit of well over \$90 from having a  
7 conversation with the Prosecution on that day, didn't you?

8 A. I was not doing business, so I don't make - I didn't make  
9 profits. I only gained from them, but I did not make profits

15:45:04 10 because I was not doing business with them.

11 Q. Friday, 14 July, box 5, please. Where were you on 14 July  
12 2006?

13 A. Ganta, I think so. Ganta.

14 Q. And did the Prosecution come to you on that occasion?

15:45:52 15 A. Came to me? I do not remember them coming to me.

16 Q. Well, what do you get the money for on that occasion?

17 A. They sent for me and I went to them.

18 Q. To where?

19 A. Monrovia.

15:46:13 20 Q. What happened when you got there?

21 A. They interviewed me. They talked to me and I talked to  
22 them. They were interviewing me.

23 Q. How long was that interview?

24 A. I don't remember how long, but we spent a lot of time  
15:46:34 25 there.

26 Q. Were they taking notes in the usual way?

27 A. Yes.

28 Q. Did they read them back to you for you to correct?

29 A. Yes, that day they read the notes to me. Yes.

1 Q. You have a clear recollection of that, have you?

2 A. Yes, I can remember that. Yes, that they read the notes to  
3 me, yes.

4 Q. Mr Witness, just explain to the judges how on earth you are  
15:47:11 5 able to remember that on 14 July 2006 you were interviewed by the  
6 Prosecution and they made notes of the interview and then read  
7 them back to you?

8 A. Because I am able to remember that time, July, because July  
9 is a big month in Liberia. They have 26 July. During that  
15:47:35 10 period any event that took place people can remember it in bits.  
11 I can remember July.

12 Q. So you remember the interview taking place on 14 July?

13 A. Yes, I can remember meeting the people from the Special  
14 Court and whenever we spoke they would write, so I can remember.

15:47:57 15 Q. On 14 July 2006, that's what I am asking you about?

16 A. Yes, that's what I am answering. I can remember talking to  
17 Special Court people.

18 Q. Did you travel by motorcycle or taxi on that occasion?

19 A. Taxi.

15:48:19 20 Q. Why not use one of your bikes and get there more quickly?

21 A. The bike was not for Special Court purpose. Whatever I  
22 thought was convenient for me to use at the time was the one I  
23 used.

24 Q. You were going to get the same amount of money whether you  
15:48:41 25 had to pay for a taxi or whether you went on your bike, weren't  
26 you?

27 A. I did not know from the people.

28 Q. Well, you were getting a standard 100 US dollars a time by  
29 then, weren't you? 50 in September, 100 in November, 100 in

1 December, 100 in June and another 100 in July. You knew you were  
2 going to get another 100 in July, didn't you?

3 A. How would I know, because we were not talking about money  
4 business? Maybe I will come today and they will say, "We don't  
15:49:26 5 have money today. Please go back and come tomorrow. We'll give  
6 you some then". I did not know. I was not expecting anything.

7 Q. You were making a nice profit out of the Prosecution during  
8 all of this, weren't you?

9 A. I was not doing business with them. I did not think I was  
15:49:42 10 making profit. If you were doing business then you would think  
11 you are making profit.

12 Q. Where were you on 22 July 2006?

13 A. In Monrovia.

14 Q. How do you know?

15:50:08 15 A. I can remember the date. I can remember the event, 26th  
16 event. I returned to Monrovia for the Independence Day.

17 Q. Box 6, please. Saturday, 22 July 2006 for transport and  
18 lost wages 25 US dollars. What cost you 25 US dollars to be  
19 interviewed in Monrovia when you were already in Monrovia?

15:50:51 20 A. Well, this 25 US dollars I can remember, they did not even  
21 give me. They did not even interview me for this \$25. They  
22 asked me to get somebody for them to go and pay the person's  
23 transport together with me so that we can come together to them.  
24 They asked me for somebody else. I told them, "I will help you  
15:51:10 25 to go and call the person", so they gave me 25 US dollars and to  
26 sign for it, to go and pay the transportation fare for myself and  
27 the person so that we can come to them, and I did that. It was  
28 not for interview.

29 Q. So you brought someone else for an interview with the

1 Prosecution for which you were paid \$25 transport for you and  
2 either him or her. Is that what you're telling us?

3 A. Let me bring in somebody --

4 THE INTERPRETER: Your Honours, can he repeat this answer.

15:51:42 5 PRESIDING JUDGE: Pause, Mr Witness, because the  
6 interpreter is not able to keep up with you. You have speeded up  
7 again. Continue your answer where you said, "Let me bring in  
8 somebody" and then continue from there.

9 THE WITNESS: I said they did not pay me for me to go and  
15:52:07 10 bring somebody for them. If they had said they will pay me I  
11 would have asked for a lot of money, but they asked me a favour.  
12 They said, "Do you know this person?" and I said yes and they  
13 said, "Would you help us to see him?" I say, "I can try". They  
14 said, "Let us pay transportation for you and the person so that  
15:52:25 15 you can bring him".

16 MR MUNYARD:

17 Q. And where was the person?

18 A. In Monrovia, an isolated area from Monrovia.

19 Q. And so you got \$25 for collecting him. Were you on your  
15:52:47 20 motorbike then?

21 A. No.

22 Q. So you went by taxi, picked this person up and brought them  
23 to, what, the same hotel?

24 A. Yes.

15:53:06 25 Q. And you made a profit out of that, is that right?

26 A. I do not understand the word "profit" really because you  
27 are just talking about profit. I am not doing business with  
28 these people, so where is profit coming from? I did not make  
29 profit out of them.

1 Q. Let me give you an example of what I mean by profit. Go  
2 back to box number 1. You're already in Monrovia. You go a five  
3 minute motorcycle journey. That must have cost you a very small  
4 amount of money in gas for your motorcycle, but they give you 50  
15:53:50 5 US dollars. If you subtract what it costs you for your petrol,  
6 your gasoline, then the rest of it is profit, isn't it? The rest  
7 of it is money in your hand?

8 A. Yes, but I did not make profit out of them. The mic - I am  
9 not hearing it.

15:54:22 10 PRESIDING JUDGE: What do you mean, Mr Witness, you are not  
11 hearing it? You are not hearing the interpreter or you are not  
12 hearing the question?

13 THE WITNESS: Okay, okay, I can hear it now. It's on now.

14 PRESIDING JUDGE: Mr Munyard, please proceed.

15:54:39 15 MR MUNYARD:

16 Q. Box 7, please, 25 July 2006. You were obviously still in  
17 Monrovia then because Independence Day is the next day, isn't it?

18 A. Yes.

19 Q. 100 US dollars for information. What was that for?

15:55:02 20 A. This particular day they wanted to see them and I told them  
21 no and they said why. I said, "Tomorrow is Independence Day and  
22 it's is a big occasion. I am going to find something that will  
23 enable me to go tomorrow" and they said, "Hey, we don't mind if  
24 you come and talk to us. Please help us by talking to us. We  
15:55:23 25 can help you with your food for your independence tomorrow".

26 THE INTERPRETER: Your Honours, can he repeat this last bit  
27 slowly.

28 PRESIDING JUDGE: Mr Witness, again the interpreter is not  
29 able to keep up with such a speed. You must repeat your answer

1 from where you said, "We can help you with your food for your  
2 independence tomorrow", and please speak slowly.

3 THE WITNESS: This date, 25 July, I was going to Ganta to  
4 go and get some money from there and at the same time these  
15:56:02 5 people had my number, they called me on the phone and they said  
6 they wanted to see me tomorrow. In fact they asked me why and I  
7 said I was going to Ganta to go and get some money because  
8 tomorrow is Independence Day, I have to make some jokes with my  
9 friends. They said, "Well, after tomorrow we would want to see  
15:56:19 10 you. We want you to come to us so that we can talk with you" and  
11 I said, "No, I am going" and they said I should come and meet  
12 them. When I got to them I was having problems with them for  
13 this hundred dollar. When I got to them after we had finished  
14 talking I said I was going back. When we finished talking I said  
15:56:36 15 I was going back and they told me, "You can have this for the  
16 time. We know that you will not be able to go to Ganta this  
17 night and come back and meet the independence, so take this to  
18 pay your transport. So get back home and try to adjust yourself  
19 for us". Why would I take --

15:56:56 20 THE INTERPRETER: Your Honour, can this witness please  
21 repeat this last bit.

22 PRESIDING JUDGE: Mr Witness, you are giving a very long,  
23 complicated answer and plus you are speeding up. Pick up are you  
24 said, "Why would I take" and continue from there, please.

15:57:14 25 THE WITNESS: Why would I take?

26 PRESIDING JUDGE: That is what you said. I will go back a  
27 piece. "So to get back home and try and adjust yourself for us".

28 THE WITNESS: Yes, when I got to them after we had finished  
29 talking they asked me questions, they had questions they wanted

1 to ask me. It was around 5. At that time I was getting ready to  
2 go home. They said, "Sign for this \$100. Please, you are just  
3 helping us. We are unable to give you more than this because it  
4 will mean that we will be paying you, but you are doing it for  
15:57:52 5 the sake of justice. Sign for this and go and adjust yourself".  
6 So I accepted it, but I told them, "No, you have really done  
7 something bad to me". They apologised and I accepted, the 25  
8 July.

9 MR MUNYARD:

15:58:08 10 Q. And what is it you claim that they had done that was really  
11 bad to you?

12 A. Because I was going to Ganta to collect money that was  
13 worth more than this money, so for their sake I did not go. So  
14 it was bad to me really. It deprived me.

15:58:35 15 Q. This is a long, complicated and completely untrue story,  
16 isn't it?

17 A. I am telling you a true story. A true story.

18 Q. You do agree that on that day at any rate you were being  
19 paid for giving them information, don't you?

15:58:58 20 A. I disagree. They didn't pay me to give them information.  
21 I disagree with that.

22 Q. "We are unable to give you more than this \$100 because it  
23 will mean that we will be paying you, but you are doing it for  
24 the sake of justice". So they were paying you, weren't they?

15:59:25 25 A. As they said - as they uttered the statement, they said  
26 they were not paying me because I told them I was going for so  
27 and so figure and now you have given me this, you've seen what  
28 you have done to me? They say, "Yes, we understand, you are just  
29 doing this because - yes, just do this because we are not paying

1 you, but because of this reason, justice". I accepted and I  
2 looked into it, I said, "Okay, I agree".

3 Q. What they did was they gave you a nice amount of money to  
4 pay for your Independence Day party, didn't they?

16:00:02 5 A. I do not have - I didn't have an Independence Day party.  
6 They didn't give me money to make Independence Day party. Before  
7 independence, it's not just one day that I will look for money  
8 for tomorrow, no.

9 Q. What did you do the day after Independence Day?

16:00:31 10 A. I think I was sitting at my house.

11 Q. How do you know?

12 A. Because I know that I was at my house.

13 Q. What did you do all day at your house?

14 A. I was spending a day after independence at my house. I was  
16:00:50 15 just relaxing, sitting down.

16 Q. Do you have a clear recollection of that now?

17 A. When I do things I don't remember, but I think I was in  
18 Monrovia sitting at my house. I don't remember what I was doing.  
19 Maybe your satellite picked me up, I don't know. Maybe you have  
16:01:12 20 the record, I don't know. Maybe you can remind me.

21 Q. Well, is the answer, "I was sitting at my house", or is the  
22 answer, "I no longer have any idea what I was doing the day after  
23 Independence Day 2006"?

24 A. After Independence Day I was at my house. I can't remember  
16:01:37 25 any more.

26 Q. Now between September 2005 and July 2006 you had been paid  
27 575 US dollars by the Prosecution almost entirely for giving them  
28 information. That's correct, isn't it, looking at those boxes 1  
29 to 7?

1 A. From which of the months, please? From August 2000 or  
2 November 2005?

3 Q. September 2005 to July 2006, 575 United States dollars you  
4 had been paid by the Prosecution, all but one amount for giving  
16:02:56 5 information. That is correct, isn't it, according to these  
6 documents we are looking at?

7 A. I think that's the figure they gave to me, but they did not  
8 give it to me for information and I want you to know something  
9 that \$575 can't make me to give information against President  
16:03:16 10 Taylor. President Taylor used to pay me monthly 400 US dollars,  
11 then up to six months or how many months and you are talking  
12 about \$575 to give information. I was just willing to talk to  
13 them. I want you to know that.

14 Q. Nearly \$600 is the equivalent of the price of a house to  
16:03:36 15 rent in Ganta for a year, isn't it?

16 A. Yes, but \$600 really when you know - if you know you  
17 wouldn't be concentrating on \$600, really. Maybe you can ask for  
18 help behind you. You can ask to know more about me, like me.  
19 \$600 cannot convince me. If only money can convince me, I think  
16:04:07 20 by now I would be talking about different things at the time that  
21 we were fighting the war for President Taylor.

22 Q. Do you know any other witnesses who have been paid even  
23 more than you by the Prosecution?

24 A. The Prosecution did not pay me, so I don't know about any  
16:04:28 25 other person that they paid. I don't know about any other  
26 person, but me, they did not pay me.

27 MR MUNYARD: Tab 1, please, and I don't want the top half  
28 of it shown. In fact, I think probably we can do without any of  
29 it being shown because I can ask the question simply about the

1 date. Perhaps the witness ought to be able to see a hard copy of  
2 it, rather than on the screen:

3 Q. Now these are the notes of interview that we have been  
4 supplied with by the Prosecution and this is the earliest set of  
16:05:27 5 interview notes that we have been supplied with. Do you agree  
6 that this is a note of the interview with you on 19 November  
7 2005? Do you see in the introductory part at the top where it  
8 has got a series of lines including the investigators it gives a  
9 date next to where it says "Subject"?

16:06:03 10 A. Yes.

11 Q. Thank you. That date I think you agree is 19 November  
12 2005. So we have no notes of interview of your first interview  
13 in September 2005 when you said notes were taken. If you turn  
14 over, Mr Witness, to tab 2 - and again I don't think there is any  
16:06:29 15 need for this to be broadcast as such - you were interviewed on 3  
16 December 2005, do you see that? It's in the bottom part of the  
17 box at the top of the page, do you see that?

18 A. Yes, I have seen it.

19 Q. And you received \$100 that day. Tab 3, please. Tab 3  
16:07:15 20 deals with the interview when you were in prison, and I will come  
21 back to that in a moment. Tab 4, please. Again on the date you  
22 will see the date in the line that's headed "Subject" on the  
23 left-hand side, 4 June 2006. Do you see that?

24 A. Yes.

16:07:49 25 Q. Now a moment ago you told us that you have a clear  
26 recollection of being interviewed on Friday, 14 July 2006. Turn  
27 to tab 5, please. Just tell the Court what is the date of the  
28 next lot of interview notes that we've been supplied with by the  
29 Prosecution?

1 A. I don't remember any date.

2 Q. Sorry, I realise I have not switched my microphone off.

3 Have a look at the date that is there just before the main body  
4 of the text. Do you see the day of the week, Thursday? Do you  
16:08:43 5 see that?

6 A. Yes, July 200 - 27, 2006.

7 Q. At what time?

8 A. 16:15 hours.

9 Q. Yes. Turn to the last page in that tab. The last page,  
16:09:01 10 please. And what time did the interview end?

11 A. 18:50.

12 Q. So you are seen for a little over two and a half hours on  
13 the day when you tell us that you thought you were sitting at  
14 home following Independence Day?

16:09:29 15 A. I told you I can't remember going somewhere. If you can  
16 remind me like this one, I can remember that, that the 27th I was  
17 interviewed, but I did not remember it at the time you asked the  
18 question. I told you that I don't remember. I am not denying  
19 that I was interviewed, but I told you I do not remember.

16:09:52 20 Q. There are no notes here - there is no notes here for any  
21 interview on 14 July 2006 when you were paid 100 US dollars for  
22 information. There is no notes here for anything at all on  
23 Saturday, 22 July, although you say you simply went in a taxi  
24 that day and there is no notes here for Tuesday, 25 July for  
16:10:24 25 which you were also paid 100 US dollars. Can you remember being  
26 interviewed on several different days in July of 2006?

27 A. Like the time you did not see any interview, I do not think  
28 I am responsible for that, but any time they gave to you or the  
29 dates, I knew it from the people. I did not write any document

1 that was given to me. They were the ones who gave you the  
2 documents, so you can ask them to show you why is it that you did  
3 not give me documents on this day. I did not claim. It was a  
4 document that was in front of me and I can't remember all of the  
16:11:08 5 things that happened. I do not know the dates and times that  
6 they interviewed me at all times. I think the people who gave  
7 you the documents, you can enquire from them, please.

8 Q. Then in August of 2006 you were taken under the wing of the  
9 Witness and Victim Section of the Court, weren't you?

16:11:35 10 A. In August, yes.

11 Q. The Prosecution continued to pay you and also the Witness  
12 and Victim Section paid you a subsistence allowance, medical  
13 expenses, transport costs, rent, maintenance and utility bills  
14 and something called miscellaneous from August 2006 to the  
16:12:09 15 present day, didn't they?

16 A. The rent, I am in there. I am not sure they were paying  
17 me. And the Prosecution hadn't anything to do with me at the  
18 time. They only picked me up and brought me. At that time they  
19 were no longer giving me transport, because they said I was under  
16:12:31 20 them. It was only WVS that I had money transaction with, but I  
21 do not think all these things were necessary that you're talking  
22 about, money, money, money. This money problem. I do not think  
23 that one can help you, this money business, or you don't need  
24 help, or you are not ready to help the President. I don't think  
16:12:52 25 this money business is a case in this Court really.

26 Q. Let me make it quite plain to you, Mr Witness, that you  
27 have been giving information to the Prosecution because you were  
28 being paid by them. That is what I am suggesting. You were  
29 making money out of this exercise and you continue to make money

1 out of this exercise, don't you?

2 A. Nobody paid me, because they did not pay me monthly to say  
3 this is your pay monthly. Nobody paid me like the way they pay  
4 you after the month - after each month, they will say go and take  
16:13:30 5 how many millions in that bank. Nobody paid me. They only gave  
6 me - sometimes they gave me 10,000 Leones by day in Freetown. In  
7 Freetown, 10,000 Leones, 3 dollars 25 cents. Calculate that one  
8 by one month. What is that? Nobody is paying me really. I want  
9 you to forget about this money business. Like you are working,  
16:13:53 10 Special Court is paying you good money. Yes, we can call that  
11 payment because after every month maybe you have your slip and  
12 you can go to the bank and take up to how many thousand euros,  
13 but nobody is paying me. If I can move from here I don't know  
14 really. I do not know what you're talking about pay, pay, pay.  
16:14:07 15 I want you to understand that. Nobody is paying me.

16 Q. Have you finished?

17 A. Yes.

18 Q. None of the amounts that we have so far looked at, even the  
19 25 US dollars for Saturday, 26 July, represents the precise  
16:14:32 20 amount of money that you had to spend in order to get to see the  
21 Prosecution and go back again, or as a result of losing earnings  
22 during the time that you spent with them, does it?

23 A. That question is long and I just had \$25. Please ask the  
24 question again. I did not understand it, please.

16:15:00 25 Q. The money that you were paid that we have looked at is  
26 round sums of United States dollars. Those sums do not simply  
27 represent what it costs you to go and see the Prosecution in  
28 either transport, food, accommodation or lost wages, do they?

29 A. I think I am not responsible for that. The people that

1 were doing the investigation they are qualified. Just like you  
2 are qualified to defend President Taylor, they were qualified  
3 people from different parts of the world. So I know that they  
4 were doing their job and they were doing a perfect job. Even if  
16:15:48 5 they gave me 1 million dollars I will take it and go and do one  
6 dollar work, I don't have a problem with that. Everybody wants  
7 money, but they did not tell me that they were paying me, but I'm  
8 not responsible for that.

9 You can only ask them, they were responsible for that. I  
16:16:01 10 know that it's the court management. It's the manager - it's the  
11 management of the Court to give money to anybody whom they talk  
12 to so that they can pay their transportation fare. They were not  
13 doing it out of their own, I know, because they were not doing it  
14 by themselves. I know it is the management of the Court. If you  
16:16:22 15 want to know more about that money business --

16 PRESIDING JUDGE: Mr Witness, you've stopped answering the  
17 question and you are giving us a lecture.

18 MR MUNYARD:

19 Q. Back to tab 19, please, box number 8. Before you look at  
16:16:54 20 it actually, Mr Witness, just tell us what were you doing on  
21 Sunday, 13 August 2006?

22 A. I can't remember.

23 Q. A week later you were taken under the wing of the WVS. Can  
24 you remember what you were doing exactly a week before you came  
16:17:21 25 into their care?

26 A. Except you remind me, but I can't remember.

27 Q. Have a look at box 8, please. 100 US dollars again, this  
28 time for transport, for travel documents and travel preparation.  
29 Does that help you to remember what that money was for?

1 A. I remember travelling but I don't remember them giving me  
2 money for travelling - travel documents and travel preparation.  
3 Before I travelled - let me clear that area.

4 Before I travelled they sent me on a mission. They gave me  
16:18:21 5 money to go and get somebody for them out of Monrovia. Maybe  
6 they gave the money to a different person to prepare a document  
7 because somebody travelled with me. That was the person who  
8 prepared document and did all the preparations, but I was not the  
9 one who handled the money.

16:18:43 10 Q. They gave you 100 US dollars, according to this document,  
11 for travel documents and travel preparation. How much of that  
12 100 US dollars did you spend on travel documents and travel  
13 preparation?

14 A. I do not know how much the person spent, because I was not  
16:19:05 15 the one who did the documents for me to travel and I don't want  
16 to call the person's name but somebody was responsible for that  
17 to travel with me.

18 Q. Is this another witness that you are talking about?

19 A. I am not talking about another witness. I am talking about  
16:19:24 20 OTP. Somebody from the OTP office.

21 Q. Well, you weren't being asked to pay their travel expenses,  
22 were you, out of your nice round \$100?

23 A. I told you earlier that I was not the one responsible for  
24 travel documents and travel preparation. Somebody who travelled  
16:19:47 25 with me was the one who was responsible for this, these  
26 particular travel documents and travel preparation. I was just  
27 with him, just like I came here.

28 Q. Right, we will move on. Friday, 18 August, can you  
29 remember what you were doing then?

1 A. I don't remember.

2 Q. Two days later you come into the ambit of the WVS. Can you  
3 remember what you were doing just two days before that?

4 A. I think it was the time that I was travelling. I think so.

16:20:41 5 Q. Box number 9, why were you given 200 US dollars for  
6 information on 18 August 2006?

7 A. I signed for 200 US dollars on 18 August to travel from  
8 Monrovia to Freetown by road. Not for information. For me to  
9 travel from Monrovia - from Freetown to Monrovia by road.

16:21:12 10 Q. On 18 August, is that the day that you travelled?

11 A. I can remember - I think so. I do not know the real date I  
12 moved.

13 Q. So can you think of any reason why the investigators have  
14 approved 200 US dollars for you for giving information on Friday,  
16:21:40 15 18 August 2006?

16 A. I did not give them information on August 18. I can  
17 remember I did not give them information. They gave me this 200  
18 US dollars because it was the first time that they had given me  
19 \$200. It was to travel from Monrovia - from Monrovia Royal Hotel  
16:22:02 20 to Freetown. They said to sleep - when I get to both to sleep  
21 there and to wait for them because they were travelling by plane,  
22 to pay hotel bills, eat, 200 US dollars.

23 Q. As a matter of interest how much did it cost you to travel  
24 from Monrovia to Freetown?

16:22:27 25 A. From Dualla - from Sinkor to Dualla I paid 40 Liberian  
26 dollars. From Dualla to the border I paid 5 US dollars. Then I  
27 took a yellow book at the border. I don't know how much I paid.  
28 Then I paid transport fare, we hired a car from Gendema to Bo.  
29 The man that was travelling with me told me to give him \$100 to

1 hire a car and I gave it to him. So the balance that remained  
2 with me up to \$80 when we got to Bo, I paid for two nights in the  
3 hotel, 75 - 75,000, the equivalent of 50 US dollars. The  
4 remaining \$30 I used to eat and order things, doing other things,  
16:23:25 5 and paid my way to go to Freetown.

6 Q. Did you make any profit out of that?

7 A. I was not doing business to make profit. I did not make  
8 any profit. I don't know what you are calling profit.

9 Q. Just help the Court with this: How is it you're able to  
16:23:44 10 remember these precise figures two years later?

11 A. Because I was the one who spent the money, that particular  
12 money. I was the one who spent the money and I can remember that  
13 event. That was the first time ever that the Special Court gave  
14 me \$200. That's why I can remember it.

16:24:06 15 Q. Box 10, please, Saturday 19 August 2006 you were paid \$100  
16 for your family's accommodation and food. Do you remember that?

17 A. I don't remember, really.

18 Q. Did it cost \$100 to accommodate and feed your family on  
19 that day?

16:24:44 20 A. I can say a figure here. There is a mistake on this \$200.  
21 I did a mistake on this \$200.

22 Q. Yes, you are looking further down the page and you have  
23 spotted the 250 - hang on. The 250 in travel costs in box 11 --

24 A. Yes.

16:25:02 25 Q. -- which we haven't yet reached. I was asking you about  
26 box 10. Please limit yourself to the areas I am asking you  
27 about.

28 A. Before I look at box 10 I want us to make a clarification  
29 on that \$200. I can remember. I didn't recall that one

1 properly. Now I recall it. I remember all these events.

2 PRESIDING JUDGE: Mr Witness, you said, "I can remember a  
3 clarification on the \$200". Is this the \$200 in box 9, or what  
4 are you talking about? You should answer the questions put to  
16:25:33 5 you.

6 THE WITNESS: Yes.

7 MR MUNYARD:

8 Q. Well, let's go to box 11. On 20 August you are given 700  
9 US dollars for family support while you were away from home for  
16:25:48 10 an extended period and also 250 US dollars in travel costs for  
11 your own relocation. That's the money that you were given to  
12 travel from Monrovia to Freetown, so go back two days earlier.  
13 What did you get \$200 for giving information for on Friday the  
14 18th?

16:26:14 15 A. Yes, that was what I was saying that I want to make a  
16 clarification between the 250 and the \$200. The \$200 was given  
17 to me to go and call somebody out of Monrovia, a far area. They  
18 told me to hire a car to go the distance that I was to cover and  
19 return with that \$200, yes. That is the clarification I want to  
16:26:41 20 make about that \$200 to go and get somebody for them.

21 Q. Are you making this up as you go along because you realise  
22 you've been caught out?

23 A. I don't understand what you mean "caught out". Like you  
24 made a mistake earlier today, I made a mistake here too on this  
16:27:01 25 \$200.

26 Q. \$200 for information, not for transport costs as we saw in  
27 box 6 when you went off in a taxi to find someone from a remote  
28 area of Monrovia. If you had been sent off again to find  
29 somebody as you are now claiming we would see it as

1 transport/lost wages or something like that. You were given \$200  
2 for giving information on 18 August, weren't you?

3 A. In box 6 I did not say out of Monrovia. I said an isolated  
4 area from Monrovia, the 25 US dollars. The \$200 was out of  
16:27:43 5 Monrovia. The \$200 was for out of Monrovia. They told me to  
6 hire a taxi. Even the area a taxi cannot go there, it's a jeep  
7 that goes there. So I took a jeep to go there, \$200, yes. When  
8 I went there I slept and the next day I returned, the 19th, and  
9 the 20th I started leaving for Freetown. I can remember.

16:28:05 10 Q. Well, I suggest to you that that's clearly untrue because  
11 the category that is specified there is information, not  
12 transport?

13 A. Well, the person - the person that they needed, they needed  
14 information from him. So that's why they put information there.  
16:28:25 15 Maybe they did not put it there, but they were using me to get  
16 information from that person, but it looks like they wanted  
17 information from that person, so it was the same information that  
18 they were looking out for, I think so.

19 Q. Why couldn't you just telephone them?

16:28:45 20 A. I didn't know whether the person had a telephone. In fact  
21 the person I was going for didn't have a telephone at that time.

22 PRESIDING JUDGE: Mr Munyard, we have already been alerted  
23 that we are out of time - we are just about out of time if this  
24 is a convenient spot to adjourn.

16:29:03 25 MR MUNYARD: I suspect that no-one will be particularly  
26 disappointed if I say I am going to stop at this point.

27 PRESIDING JUDGE: Mr Witness, it's now just around 4.30 and  
28 we are adjourning for today. We will resume tomorrow at 9.30 and  
29 again I remind you that you are under oath and you are not to

1 discuss your evidence with any other person. Do you understand?

2 THE WITNESS: Yes.

3 PRESIDING JUDGE: Please adjourn court until tomorrow the  
4 at 9.30.

16:29:33

5 [Whereupon the hearing adjourned at 4.30 p.m.  
6 to be reconvened on Wednesday, 27 August 2008  
7 at 9.30 a.m.]

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WITNESSES FOR THE PROSECUTION:

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CROSS-EXAMINATION BY MR MUNYARD 14530