



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 29 OCTOBER 2009
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Ms Erica Bussey

For the Registry:

Ms Rachel Irura
Mr Benedict Williams

For the Prosecution:

Ms Brenda J Hollis
Mr Christopher Santora
Ms Ruth Mary Hackler

**For the accused Charles Ghankay
Taylor:**

Mr Courtenay Griffiths QC
Mr Morris Anyah
Mr Terry Munyard

1 Thursday, 29 October 2009

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:30:32 5 PRESIDING JUDGE: Good morning. We'll take appearances,
6 please.

7 MS HOLLIS: Good morning, Mr President, your Honours,
8 opposing counsel. This morning for the Prosecution, Brenda J
9 Hollis, Christopher Santora and Ruth Mary Hackler.

09:32:15 10 PRESIDING JUDGE: Thank you. Yes, Mr Griffiths.

11 MR GRIFFITHS: Good morning, Mr President, your Honours,
12 counsel opposite. For the Defence today, myself Courtenay
13 Griffiths and with me Mr Morris Anyah and Mr Terry Munyard of
14 counsel.

09:32:27 15 PRESIDING JUDGE: Thank you. Mr Taylor, once more I remind
16 you that you are still bound by your oath.

17 Go ahead, please, Mr Griffiths.

18 MR GRIFFITHS: May it please your Honours.

19 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

20 [On former affirmation]

21 EXAMINATION-IN-CHIEF BY MR GRIFFITHS: [Continued]

22 Q. Mr Taylor, yesterday we had reached the point where the
23 witness we were dealing with, and remember this is a protected
24 witness so we do not mention names. That the witness described
09:32:56 25 being assigned as a bodyguard by Benjamin Yeaten to Sam Bockarie,
26 do you recall that?

27 A. Yes, I do.

28 Q. Let us pick up that account now, please, at page 19859,
29 testimony of 5 November 2008:

1 "Q. What was your relationship like with Sam Bockarie
2 during the time you were his bodyguard?

3 A. I was very close to him. We used to sit together and
4 discuss, and most of the things that he was not satisfied
09:33:38 5 with that had caused him to leave the RUF, we used to sit
6 down and talk about them. He - the effort that he had
7 really made for the RUF. He said he had never benefitted
8 anything. The fact that he has left Sierra Leone, he was
9 regretful of that. He said Mr Taylor called him and told
09:34:05 10 him that he should leave there because Foday Sankoh wanted
11 Issa Sesay to take over as commander because Mosquito maybe
12 one of these days might take over the RUF. That was
13 Sankoh's fear. So I was very close to him and we were
14 doing things in common."

09:34:34 15 Now, let's pause there for a minute, Mr Taylor, and I want
16 us to deal with aspects of this. First of all, you realise that
17 the witness is here speaking of direct conversations he had with
18 Sam Bockarie? Do you understand that?

19 A. Yes.

09:34:52 20 Q. Now, according to him, Bockarie's account or reason for
21 leaving Sierra Leone was because you had called him and told him
22 that he should leave because Foday Sankoh wanted Issa Sesay to
23 take over as commander because Sankoh's fear was that Mosquito
24 might take over. Now what do you say about that, Mr Taylor?

09:35:26 25 A. Well, I can't - I don't know if Sam Bockarie ever really
26 had such a conversation, but that is incorrect. We've presented
27 all of the records before this Court, even from the presence of
28 United Nations personnel involved in the negotiations to remove
29 Sam Bockarie from Sierra Leone because of the peace process. So

1 if his accounts are correct, that will be far strange to me.
2 What I know and what I have presented evidence, documentary
3 evidence, my knowledge of that case is the conflict between
4 Sankoh and Bockarie for Bockarie's failure to submit himself to,
09:36:19 5 one, the peace process and the authority of Sankoh and
6 everybody's gets involved; I get involved, ECOWAS, United
7 Nations. So I disagree fully with how he structures this, but I
8 cannot account for the conversation. I don't believe that Sam
9 Bockarie told him this.

09:36:41 10 Q. Now, he goes on and you will note, and it's a point to
11 which we will return in a moment, that according to the witness
12 Sam Bockarie told him that he had never benefitted anything. You
13 note that?

14 A. Yes.

09:37:01 15 Q. We will come back to that in a moment. He continues:
16 "Q. You said that Mosquito said Mr Taylor called him.
17 What name or what terms did Mosquito use to refer to
18 Charles Taylor?"

19 A. He used to call him chief. He said, 'Had it not been
09:37:21 20 for the chief who called me to come we would have all
21 fought for that place until all of us lost the ground.' It
22 was Taylor that he was referring to, that every instruction
23 he is taking directly from Mr Taylor. So he called him
24 chief at that time because at that time Sankoh was not
09:37:45 25 there, he was in jail in Togo. So the RUF was not directly
26 under Mr Taylor, so Mosquito reported directly to
27 Mr Taylor. So when he said 'chief' he was referring to
28 Mr Taylor."

29 Note, Mr Taylor, and perhaps you can deal with this

1 briefly, taking instructions directly from you, was he?

2 A. No, he was not. And the witness himself called me chief
3 along with millions of other Liberians. So that chief, I have
4 explained to this Court and I am not going to repeat myself what
09:38:28 5 that chief is. And chief has got nothing to do with direct
6 control. It has to do with a title. So this I would just say is
7 maybe an unintentional description of a situation that this
8 witness does not know and he is trying to explain something that
9 he is not aware of the details. And I think this is
09:38:52 10 unintentional.

11 Q. To your knowledge, was Sankoh ever in jail in Togo?

12 A. Never. Never.

13 Q. And what do you understand by the phrase, "So the RUF was
14 not directly under Mr Taylor"?

09:39:08 15 A. That I did not have control and then he comes back and said
16 I had control. But that shows you the confusion in the minds of
17 these people that I don't know the conditions under which they
18 were brought here.

19 Q. He is asked a further question then --

09:39:41 20 PRESIDING JUDGE: I think there is an important error in
21 the LiveNote transcript that even though I know that the
22 transcript is revised at the end of the day, this could easily be
23 missed so it's important enough to pick it out now.

24 Earlier in the answer that you read out, Mr Griffiths, the
09:40:16 25 transcript reads this way, "So the RUF was not directly under
26 Mr Taylor." In fact I think you read out that the RUF was now
27 directly under Mr Taylor.

28 MR GRIFFITHS: It should be as from the transcript "was not
29 directly under Mr Taylor." That's what it should read.

1 PRESIDING JUDGE: That's what it should read. In other
2 words the transcript is correct?

3 MR GRIFFITHS: Yes.

09:40:54

4 PRESIDING JUDGE: I have been misled then. I will leave
5 the transcript alone in that case.

6 MR GRIFFITHS: It should read - because the passage at page
7 91860 that I am referring to at line 4 reads, "So the RUF was not
8 directly under Mr Taylor".

09:41:09

9 PRESIDING JUDGE: And then it goes on to say, "So Mosquito
10 reported directly" - I understand. I withdraw what I said.

11 MR GRIFFITHS: Not at all:

12 Q. Now, the witness was then asked this question, Mr Taylor:

13 "Q. When I asked you about what Mosquito called Mr Taylor
14 you said - part of your answer was, 'We would have all
15 fought for that place.' What place was Mosquito referring
16 to?

09:41:35

17 A. The RUF controlled areas where he was in Buedu, the
18 entire control area. He said had it not been for the chief
19 Mr Taylor who had told him to leave the ground to come in
20 Liberia, 'Issa and I would have continued fighting at that
21 place until all of us lost the ground.' That's what he
22 said."

09:41:54

23 Now, Mr Taylor, if you could just deal very quickly,
24 please, with this proposition. In intervening in that discussion
25 or dispute between Sankoh and Bockarie, did you order Bockarie to
26 leave or did you make a suggestion to him that it might be in the
27 best interests of the movement to leave, which is it? How was it
28 put to him?

09:42:12

29 A. Well, I think the two happened and I will give you the

1 circumstances. One, it was not - the peace process had to go and
2 at some point I have explained we did take a very hard line. By
3 "we" I mean in that last meeting Obasanjo and myself did take a
4 very hard line in the final meeting with Foday Sankoh and
09:42:58 5 Bockarie. We had gone through - I had gone through at least a
6 couple weeks or more of dealing with this matter and when I
7 reached a dead end that's when I invited Obasanjo to come to
8 Liberia for us to deal with it and the special representative of
9 the Secretary-General. And in that meeting, after we saw that we
09:43:18 10 could not get Bockarie to consent to the two propositions being
11 to disarm and submit to Sankoh's whatchamacallit, I can remember
12 in that meeting where Obasanjo even got upset and said, "Look,
13 this process will happen. We will do what we have to do. If we
14 have to fight you we will fight you and you will either leave or
09:43:44 15 we will do something to hold you." At that particular point we
16 did threaten him with keeping him in Liberia until after
17 disarmament, okay. So this is the way the conversation went.

18 Q. I just want a simple answer, Mr Taylor. Was it a case of,
19 "You, Sam Bockarie, leave Sierra Leone now and come to Liberia"?

09:44:08 20 A. No, no, no, no, no.

21 Q. The witness was further asked on that page, Mr Taylor, line
22 19 - he is asked about the RUF's relationship to you and his
23 answer is to this effect:

24 "I said Mosquito said he had been with the RUF and they
09:44:40 25 were taking direct orders from Mr Taylor, and in fact, as far as
26 he, Mosquito, was concerned, it was only Mr Taylor that he was
27 taking orders from because Foday Sankoh was now - now wanted him
28 to be killed, so he was now only looking up to Mr Taylor?"

29 Now, what do you understand by that, Mr Taylor?

1 A. I really - this is - this man just said up here that they
2 were not directly under me, then he comes down here and says they
3 are take direct orders from me. I don't know how to put this,
4 okay? The RUF was not taking any direct orders from me, was
09:45:29 5 never under me.

6 Q. And, Mr Taylor, in case it assumes importance at a later
7 stage, how would you describe your relationship with Sam
8 Bockarie?

9 A. I am going to look at it typically from an older man,
09:45:53 10 African leader standpoint. For me, Sam Bockarie, I would look at
11 him like he, Issa or anybody - like, younger men, and I would
12 like at him, as we Africans do, as a son. That's how I would
13 look at him. Anybody younger than us, we look at them - "my
14 son", we called them, and different thing. There was no cosy

09:46:13 15 relationship with Sam Bockarie. I dealt with Sam Bockarie on the
16 basis of his leadership with the RUF. I respected him because he
17 was leading his group, but I also looked at him as a younger man
18 that - he also gave me respect. I did not impose my will on him;
19 I did not dictate to him; I listened to listened to him. He
09:46:40 20 conducted, along with his people, all of their negotiations,
21 whether it was with me or other African leaders. But there was
22 no like what you call a boy - a servant/master type relationship,
23 no.

24 Q. And whilst we are on the topic. Just give us a quick pen
09:47:02 25 portrait of the kind of person Sam Bockarie was?

26 A. My reading of Sam Bockarie - Sam Bockarie did not appear to
27 have gone very far in school, but he was what I would call street
28 smart, and maybe that accounted for his shortcomings in school.
29 He was street smart. He knew what he wanted. He had

1 certain - he had command strength, because all of those that
2 worked with him took orders and he kept things under control.
3 But on the academic side, he was not very sharp. But he was
4 very, very, very - I would say intelligent. He was an
09:47:50 5 intelligent young man.

6 Q. Now, whilst we are here, let's do the same with Issa Sesay.
7 What was your relationship with him?

8 A. Issa Sesay, similar to Sam Bockarie. When I did meet him,
9 close to Sankoh, I think, a relation of Sankoh. Someone else
09:48:09 10 that - I am not sure. I don't know how far he went in school,
11 but he did not demonstrate great academic skills, but very
12 trustworthy. Issa Sesay the type of person if he said he would
13 do something, he would do it and I --

14 Q. Would you say Bockarie was as trustworthy as Sesay?

09:48:35 15 A. It's hard to compare humans that way, but I would say that
16 to a great extent I would put Sesay a few more notches above him
17 as far as trustworthiness and being able to be - to say what he
18 is going to do and do it, I would put Issa a few notches above
19 Sam.

09:49:07 20 Q. Sorry, I interrupted you. What else were you going to go
21 on to say about Issa Sesay?

22 A. Well, you know, it is that - that level of being very
23 decisive, okay, and being very trustworthy that all of us in
24 ECOWAS worked very closely with him to move the peace process
09:49:31 25 forward. Because if he had not been forthcoming, I do not think
26 that the Lome agreement would have worked.

27 Q. Let's go back to this. Now, as far as you are aware,
28 Mr Taylor, given the nature of what is suggested against you,
29 where the witness claims that Foday Sankoh now wanted to kill

1 Bockarie, was it your perception that Sankoh, at the end, felt
2 that way towards Bockarie, that he wanted to kill him?

3 A. No, not - based on my own assessment, no. Sankoh, in fact,
4 was hurt, because he said he always had Bockarie very close to
09:50:20 5 him, and I can remember one conversation Sankoh - and the reason
6 why he was so hurt was that he said he had elevated Bockarie over
7 individuals that were better educated and better what than
8 Bockarie. And really if anything he felt betrayed, but he never
9 mentioned to me - neither did I read in his statements - that he
09:50:44 10 wanted to harm Bockarie, no. He was disappointed and felt
11 betrayed and hoped that Bockarie never reached to the point of
12 trying to disrespect him, but I did not sense that in his
13 statements.

14 Q. Okay. Let's continue. The witness was then asked this,
09:51:09 15 page 19860, line 26:

16 "Q. You talked about Sam Bockarie talking about his
17 efforts for the RUF. Did he explain what efforts he made?

18 A. Yeah. He said - during those days when we were
19 together sitting down, he said his effort in there when
09:51:30 20 they used to take the diamond - diamonds they had a certain
21 portion that he used to take directly to Mr Taylor to
22 purchase arms and ammunition. Then another portion would
23 be - would be shared among the various commanders like he,
24 Issa, and the other deputies. Then there was another
09:51:53 25 portion that was kept separately for Foday Sankoh when he
26 comes from jail so that it will be turned over to him.
27 Those were the types of efforts that he was applying and he
28 was referring to."

29 Now, Mr Taylor, that sharing out of the loot, the diamonds,

1 some to you, some amongst the commanders, some for Sankoh; what
2 do you say about that?

3 A. That's not - that's a lie. And one would wonder why, if
4 this is true, why Bockarie did not report to Sankoh when Sankoh
09:52:32 5 came that he had given me diamonds. That is not true. This is
6 such a protected witness, but we know the nature of this witness
7 that I can't talk about here because he is protected, and I think
8 some of this was in closed session. But we know this witness,
9 and so when it comes to his testimony, we - you know, we know
09:52:54 10 some other lies that this witness told even while he sat here in
11 this place. So I wouldn't put anything - I wouldn't put any
12 credence to what he is saying, because I want to believe that the
13 proof we have here - when Sam Bockarie in 1999 comes to Liberia
14 and Foday Sankoh comes to Liberia from Lome, Sam Bockarie reports
09:53:15 15 to Foday Sankoh. I see no reason why Sam Bockarie would hide
16 from Foday Sankoh that he has been giving me diamonds. I mean,
17 so - I mean, but we know about this witness, you know, that maybe
18 in another setting I will state what I mean about we know about
19 this witness, because we lied while he was sitting here.

09:53:34 20 Q. Well, Mr Taylor, you will note that at this point in the
21 witness's testimony at page 19861, he is claiming that Bockarie
22 said to him that he, Bockarie, along with Issa and others, was
23 taking a share of the diamonds. You see that?

24 A. Yes.

09:53:57 25 Q. And you recall a couple pages earlier he said that the same
26 Bockarie told him that he had never benefitted anything.

27 A. That's true.

28 Q. Yes?

29 A. Yes.

1 Q. Now, did you know of Bockarie taking a share of the
2 diamonds?

3 A. No, I had no idea.

4 Q. And were you taking a share?

09:54:19 5 A. No, no.

6 Q. To your knowledge, was Sankoh taking a share?

7 A. Well, no, I had no knowledge except from documents that -
8 which relates to the Defence by the Prosecution of allegations.
9 But other than that, no, I am not aware.

09:54:42 10 Q. And in the same vein, the witness went on at page 19862 to
11 say this, line 15:

12 "A. I said General Sam Bockarie, Mosquito, he said when he
13 was controlling the RUF at any time he collected diamonds
14 he divided them into three portions and the first one was
09:55:07 15 to be sent to Mr Taylor to purchase arms and ammunition,
16 and the other portion was to be divided amongst he, Issa
17 Sesay and the other generals, and the other one will be
18 kept purposefully for Foday Sankoh. That was what he said.

19 Q. Did Sam Bockarie ever tell you whether these arms and
09:55:28 20 ammunition that he received from Mr Taylor, whether that
21 was the only source he had for arms and ammunition, or
22 whether the RUF had other sources?

23 A. He never told me about anywhere that they used to get
24 arms and ammunition, he only told me that it was
09:55:47 25 directly from Mr Taylor to the RUF. That is arms and
26 ammunition. He did not tell me any other thing. Any other
27 thing. Whether they used to get it from somewhere else or
28 not, I do not know."

29 And then he goes to say that Bockarie told him that the

1 diamonds came from the Kono area.

2 Now, Mr Taylor, before we move on to another topic, is
3 there anything else you want to say about that suggestion?

4 A. That is total - I - it is strange to me that a security
09:56:26 5 personnel who is on duty would sit down and go through this much
6 thing, but I really, really doubt very much that Foday Sankoh
7 told this boy - I mean Sam Bockarie told this boy this, what he
8 is saying. So I will just say that it's just another set of lies
9 that he put together, and probably he did hear something that he
09:56:51 10 did not explain properly. But that is also true of him, because
11 I know him very well from his actions here while he was giving
12 evidence and what he concocted while he sat right in this chair.

13 MR GRIFFITHS: Now, Mr President I propose at this stage to
14 move on to another aspect of the testimony of this witness,
09:57:15 15 which was given at the time in private session, on the basis that
16 because of the particular thing - events described, they may well
17 disclose his identity. So out of an excessive caution, I think
18 it might be wise, whilst we deal with this aspect, to go into
19 private session.

09:57:40 20 PRESIDING JUDGE: Yes, Mr Griffiths. Well, I will trust
21 your judgement on that, because the original evidence was given
22 in private session as well.

23 To the members of the public, we are now going to go into
24 private session. The reason is to protect the identity of a
09:57:58 25 witness who is the subject of a protective measures order made by
26 the Court. What that means to the public is that you can
27 continue to watch the proceedings, but you won't be able to hear
28 anything. I am not quite sure how long this private session will
29 last.

1 Do you have any estimate, Mr Griffiths?

2 MR GRIFFITHS: I think about 20 to 30 minutes.

3 PRESIDING JUDGE: All right. So we are looking at 20 to 30
4 minutes in private session.

09:58:29 5 Madam Court Manager, could you please put the Court into
6 private session.

7 [At this point in the proceedings, a portion of
8 the transcript, pages 30651 to 30678, was
9 extracted and sealed under separate cover, as
10 the proceeding was heard in private session.]

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1 [Open session]

2 MS IRURA: Your Honour, we are in open session.

3 MR GRIFFITHS: Now, Mr President, could I ask everyone -

4 because the exercise we are going to engage in now is to look at

10:55:57 5 the location White Flower in Monrovia through a series of

6 photographs and a video, because of the number of times it's been

7 referred to in terms of arms being collected and the like. With

8 that in mind, can I ask everyone, please, to take up Defence

9 exhibit for week 39, binder 1. And whilst we are at it, can we

10:56:34 10 also take up Defence exhibits for week 40, which should be a slim

11 volume like this in a plastic folder.

12 Q. Mr Taylor, I think it would be easier - because what I

13 would like us to do is for you to talk us through the

14 photographs, okay?

10:57:29 15 A. Yes.

16 Q. So let's switch seats now.

17 And Mr President, can I just remind ourselves - because I

18 will be asking in due course for these photographs to be marked

19 for identification. I think we are up to MFI-264.

10:57:54 20 PRESIDING JUDGE: I think that would be the next document

21 marked, yes.

22 MR GRIFFITHS:

23 Q. Right. Mr Taylor, I want us to begin, please, with the

24 bundle of photographs for week 39, all right?

10:58:10 25 A. Yes.

26 Q. And I want us to start behind divider 5. Now, can I just

27 hold this up and ask - do we all see this photograph behind

28 divider 5? Right.

29 Now, Mr Taylor, let's start with this photograph, all

1 right? So it's DP-154. What do we see in this photograph,
2 Mr Taylor?

3 A. This is a dirt road.

4 Q. Yes. Where?

10:59:17 5 A. This is in Congo Town. This appears to be going
6 down - there is a hill away from White Flower.

7 Q. On the right we can see a wall, Mr Taylor, of that
8 photograph, painted white, yes?

9 A. Yeah.

10:59:45 10 Q. Which wall is that?

11 A. That's not - I don't know which wall this is. This is not
12 my wall. This is a building - this road sloping down this hill
13 is going down to the area - we can't see it in details here.

14 Down here, if you go over to the right, Benjamin Yeaten lives
11:00:14 15 down this hill here. But this is a few - maybe a couple hundred
16 yards up this way would be my house.

17 Q. Up which way?

18 A. If you go towards the left, because the boulevard is beyond
19 this dirt road, okay. The boulevard is not covered here. You
11:00:37 20 turn off the boulevard and you go down this hill and go to your
21 right and Benjamin Yeaten is in this direction.

22 Q. All right. Let's look at it differently, Mr Taylor. The
23 photographer has his back to which landmark?

24 A. To Tubman Boulevard.

11:00:58 25 Q. And the photographer is facing down towards what?

26 A. He is facing down towards the valley where Benjamin
27 Yeaten's house is located.

28 Q. Right. Okay. So that's a view towards Benjamin Yeaten's
29 house, yes?

1 A. That is correct.

2 Q. Right. Let's go behind the next divider, shall we, and we
3 see DP-155. Mr Taylor, what are we looking at in this
4 photograph?

11:01:41 5 A. This is - now this is in the valley.

6 Q. Yes.

7 A. That slope we saw going down, we are at the bottom of the
8 valley. And there are houses here further in this direction.

9 Q. In which direction?

11:02:01 10 A. Where I am pointing right now, towards the right. Benjamin
11 Yeaten lives down here in this area.

12 Q. Okay. So that again is a view towards Benjamin Yeaten's
13 house, yes?

14 A. That is correct.

11:02:17 15 Q. Right. Let's go to the next photograph, please, behind the
16 next divider, DP-156. What are we looking at now, Mr Taylor?

17 A. This is the same valley. Over here, where I am pointing
18 right here, is Benjamin Yeaten's house. I think this appears to
19 even be the top of that house here.

11:02:50 20 Q. Okay. So 156 is another view towards Benjamin Yeaten's
21 house, yes?

22 A. That is correct.

23 Q. 157, over the page?

24 A. That's the same general area. You come down the valley,
11:03:13 25 take a right, this just stops in the valley. Take a right you go
26 to Benjamin Yeaten's house. Take a left you go towards Joseph
27 Montgomery. So this is the same valley towards his house.

28 Q. Okay. Let's move then swiftly to DP-158 behind the next
29 divider. What are we looking at now?

1 A. This picture is a partial rear view of my house, White
2 Flower itself.

3 Q. Right. So this is a rear view of White Flower, yes?

4 A. Well, I would say a partial rear view because you don't see
11:03:55 5 the whole house. Right here, this here is the front gate from
6 the boulevard.

7 Q. Right. What colour is the front gate from the boulevard?

8 A. Red. Right here, red. Now you come down - so what we are
9 looking at here, we are looking at the garage and up here is my
11:04:20 10 office. So the only thing you can see in this picture, you see
11 my office and the staircase from the very bottom of the compound
12 that goes up.

13 Q. Right. I want us to take things rather more slowly now,
14 Mr Taylor, because this location has some significance, okay?

11:04:40 15 A. Yes.

16 Q. We see to the left of the photograph, as we look at it, a
17 white painted what appears to be a wall, yes?

18 A. Yes.

19 Q. Is that the boundary of the premises?

11:04:58 20 A. Yes, to the left side. This is the fence. This is the top
21 of the fence, like I said.

22 Q. Now, Mr Taylor, when someone uses the word "fence" to me, I
23 think of something other than a brick structure, all right?

24 A. Yes.

11:05:15 25 Q. Is this a fence made of brick, or what material is it
26 constructed of?

27 A. Well, this is a structure that is made of concrete and
28 reinforced concrete. At the top of this fence, of this concrete
29 structure, 8, 16, 4, it's about 20 inches across the top. In the

1 middle it is reinforced concrete all around. And 8 inches of
2 blocks, 8 plus 4, yes, so this is a concrete structure. We call
3 it a fence.

4 Q. Now, Mr Taylor, it might help us to move more quickly when
11:06:01 5 we go on to other photographs if we spend a little time here just
6 dealing with some of the details.

7 A. Yes.

8 Q. To the left of that fence as we look at it, yes, on the
9 other side of the fence, what is there?

11:06:19 10 A. Here, extending for about 100 yards, we have banana and
11 plantain trees. There are no houses here. This is just - in
12 another picture we will see it. There are trees, bananas,
13 plantains. It's a little orchard here. And I would say the
14 breadth of that would be about 100 yards or more.

11:06:49 15 Q. Right. Now, moving across the photograph from that wall we
16 see the red painted structure which you tell us is the entrance
17 gate, yes?

18 A. Yes.

19 Q. What's on the other side of the entrance gate?

11:07:06 20 A. Tubman Boulevard.

21 Q. Right. Now, we will come to see that in due course.

22 A. Yes.

23 Q. Now, one also gets the impression, Mr Taylor, from this
24 photograph that the terrain slopes downwards from that gate. Is
11:07:23 25 that correct?

26 A. That is correct.

27 Q. Now, moving again to the right, on the ground floor, at the
28 rear, what are we looking at, those three dark holes, if I can
29 call them that?

1 A. Here?

2 Q. Yes.

3 A. These are parking areas for my cars. There are three down
4 here and two up here.

11:07:43 5 Q. Right. So when we go above that to what we in Britain
6 would call the first floor, yes, what are we looking at when we
7 see that pinkish window area and then to the right what appears
8 to be the rear of a vehicle, what are we looking at?

9 A. Okay. Right here we are looking for a Secret Service post.
11:08:10 10 This is the Secret Service office here. These are my vehicles
11 parking lots here. Up here.

12 Q. So, Mr Taylor, just pause there. As I say, you know, we
13 need to go quite slowly. The parking lots on there, are they on
14 the same level as the gate that we can look at?

11:08:31 15 A. That is correct, yes. The parking lot, yes.

16 Q. So that gives us an impression of how steep the slope is,
17 yes?

18 A. That is correct.

19 Q. Because that vehicle there is at the height of the red gate
11:08:44 20 we can see at the front, yes?

21 A. That is correct.

22 Q. What's on the third floor above that parking area?

23 A. Above here are my private offices. Up here.

24 Q. Right. Let's go to the right of the photograph - just go
11:09:00 25 to the right of that structure. There appears to have been like
26 a walkway to the structure on the right.

27 A. Here?

28 Q. Yes. What's that?

29 A. There is a walkway that you can leave this, my office,

1 through this walkway and enter into the living quarters of my
2 house, which is up here at the fourth floor of the building.

3 Q. Right. Now, what's the tower that we see?

4 A. This tower is - this tower contains the elevator shaft.

11:09:48 5 There is an elevator in the house. Up here, these are water
6 storage areas for gravitational flow of water in the building.

7 Q. Now, stay on that side of the photograph, Mr Taylor. Now,
8 that structure you described as the walkway, beneath that, am I
9 right that we can see some stairs?

11:10:18 10 A. Yes.

11 Q. Do those stairs lead down from the level where the gate is?

12 A. Yes.

13 Q. And then there is a level area and then the stairs go down
14 again to the right-hand corner of the photograph, don't they?

11:10:34 15 A. That is correct.

16 Q. And, again, that gives us an impression of the extent of
17 the slope?

18 A. That is correct.

19 Q. Okay. Now, moving to the building on the right now, yes,
11:10:46 20 top floor you say is living quarters?

21 A. That is correct.

22 Q. Middle floor that we can see, what's there?

23 A. These are receiving areas, living-rooms, receiving areas.

24 Q. And below that?

11:11:02 25 A. The second floor, that's the - also receiving. This is the
26 family area and the dining room on this floor.

27 Q. Right. Okay. Let's go behind the next divider now.

28 PRESIDING JUDGE: Just before you do, I just wanted to ask
29 this question, Mr Taylor: If we look at that reinforced concrete

1 wall to the left of the photograph and you said the left of that
2 wall further, still, there is no houses but just banana and
3 plantain.

4 THE WITNESS: That is correct.

5 PRESIDING JUDGE: Well, if you look at the top of that
6 wall, there is an electric wire. Where is that going?

7 THE WITNESS: Where are you referring to here, your Honour?

8 PRESIDING JUDGE: If you look at the top of the wall on the
9 left, there is what appears to be an electrical wire.

11:11:59 10 THE WITNESS: This? This is what you are referring to?
11 Well, I am not sure if it's an electric wire, your Honour. What
12 this is, these are wires - we have cameras installed
13 around - these are security cameras. The wires that come and run
14 down into - it comes s here. Because you still don't see the end
11:12:24 15 of the yard, your Honour. This is - where this picture stopped
16 is about - I would say about maybe one third of the way. But
17 these are camera wires that are running, because there are
18 security cameras around the wall.

19 PRESIDING JUDGE: I see. Thank you.

11:12:45 20 JUDGE DOHERTY: Could I also ask for some clarification?
21 Counsel in his question referred to the four floors of a living
22 area. The photograph, what I immediately see is three floors.
23 Is there like a --

24 MR GRIFFITHS: We will get to it in a moment, your Honour.

25 JUDGE DOHERTY: I see. Very well, I'll wait.

26 MR GRIFFITHS: When we move to the next photograph we will
27 see precisely what is being said:

28 Q. Let's go to DP-159, Mr Taylor. Now, Mr Taylor, we are
29 going to move in the same way, yes. Let's start on the left of

1 the photograph, all right?

2 A. Yes.

3 Q. Now, we can identify the elevator shaft and the water
4 tower, can't we?

11:13:36 5 A. Yes.

6 Q. Now, starting on the left, you see to the left of that
7 tower, as we look at it, what do we see there, just below that
8 tree? Move across - yes. What's that? Just remind us, where
9 you have just pointed, Mr Taylor.

11:13:56 10 A. Right here?

11 Q. Move it across a bit to the first bit of the structure.
12 What's that?

13 A. Here is my office area. The parking lot right here, yes.

14 Q. Right. So now we have got our bearings, okay. Now, what I
11:14:16 15 want you to do is start from the top, and bearing in mind Justice
16 Doherty's question, just explain the floor layout and take us
17 down to the ground floor. Do you follow me?

18 A. Yes, I do. The slope is of such, when you drive from the
19 boulevard at the red gate that was shown before and you drive
11:14:40 20 into the yard, you drive beginning at the third floor. That's
21 the level. So this is the fourth, is the third, here is the
22 second. Down further, you can't see that yet, is the first,
23 which is the ground floor that comes down. What you are seeing
24 here, you haven't asked me to describe this part yet.

11:15:12 25 Q. Well, I wanted you to, Mr Taylor. Just carry on down this
26 structure.

27 A. So this is the fourth floor. You can see third, second.
28 The first is still behind this wall and the staircase that we saw
29 coming down will show. The area you are looking at now has not

1 been done since I left. This is the tennis court and this is
2 that wall - this is the right side of that wall. And let me add,
3 we are still looking at the top of that wall that I called the
4 fence, and the wall itself is 20 feet high. So we are still - we
11:15:49 5 are looking at the top of the wall. This is just the very top.
6 I had said securities walked around this top. But from the
7 ground to this top is 20 feet. And so you are just looking at
8 the right side of the tennis court coming at the back of the
9 building.

11:16:05 10 Q. Right. So, Mr Taylor --

11 PRESIDING JUDGE: So what year are we looking at that these
12 photos were taken?

13 THE WITNESS: These photos were taken over the past year.

14 PRESIDING JUDGE: They are very recent.

11:16:20 15 THE WITNESS: Very recent. Very recent, your Honour.

16 MR GRIFFITHS:

17 Q. Now, Mr Taylor, let's go back to the photograph, please.

18 A. Yes.

19 Q. Now, as we look at it, at the back of the tennis court, as
11:16:39 20 we are looking at the photograph, yes? Where we see that
21 vertical wall painted green which is peeling, yes?

22 A. Yes.

23 Q. What are we looking at there?

24 A. Well, in here where you see these windows, in here is a
11:16:57 25 squash court. So there is a structure - this is the squash court
26 here. Up here at the back here is the squash court. In the
27 front area here is also a games area where there is a table
28 tennis room. It's looking small here, but it's a big space.
29 There is a table tennis here, an exercise room, lifting weights

1 and different things, and in this higher structure is for squash.

2 Q. Now, Mr Taylor, bearing in mind the learned judge's
3 question, help us. These photographs may have been taken
4 recently, but has the structure of the premises changed in any
11:17:42 5 fundamental way from when you were there?

6 A. Not in any way, even fundamental. It hasn't changed in
7 anyway. It's because of my absence there is disrepair. That's
8 why it is looking this way. But there has been no fundamental
9 change.

11:17:59 10 Q. Now, Mr Taylor, the wall we are now looking at, right?

11 A. Yes.

12 Q. Does that face the wall we looked at in the previous
13 photograph? This is the other side of the structure?

14 A. That is correct.

11:18:13 15 Q. Now, if we look on top of that wall away from the
16 photographer, what is that tall structure which - with a curved
17 bend on the end above what you --

18 A. There?

19 Q. Yes. What's that?

11:18:32 20 A. These are lights used at night for the tennis court. This
21 is a light pole and these are lights up here.

22 Q. Okay. Right. Now, let's go beyond the wall. The white
23 building to the right, what is that?

24 A. This is the Secret Service headquarters here.

11:18:53 25 Q. Right. Now, just take us from - what's on the top floor?

26 A. The top floor are the offices of the Secret Service and
27 other security agencies at the top floor here.

28 Q. Right. And what's on the ground floor?

29 A. The ground floor are the - is the warehouse where the

1 Secret Service keeps - this warehouse has been referred to. It
2 is at the bottom of this particular building.

3 Q. Right. And pardon me for being stupid: What's kept in the
4 warehouse?

11:19:26 5 A. Well, I would - they had their ammunition, they had food
6 and other supplies kept in the warehouse.

7 Q. On the ground floor?

8 A. On the ground floor, that is correct.

9 Q. Is there an underground part to that building?

11:19:44 10 A. This building?

11 Q. Yes.

12 A. No.

13 Q. So the two floors we can see are the only two floors to the
14 structure?

11:19:52 15 A. That is correct.

16 Q. Okay. Now, coming from the rear of that building towards
17 the photographer we see something like a square hole in the
18 ground. What is that?

19 A. Here?

11:20:11 20 Q. Yes.

21 A. Right here?

22 Q. Yeah. What's that?

23 A. I don't know.

11:20:21 24 Q. What's that structure up against the wall to the left of
25 that - what looks like a shack up against the wall?

26 A. I am not sure what it is. This could be something - I am
27 not sure. Right here?

28 Q. Yeah, what's that?

29 A. I am not sure what it is. No, I don't know what this is,

1 really.

2 Q. And that metal structure in the bottom right-hand corner,
3 Mr Taylor, what's that?

11:20:52

4 A. This is holding, at the top right here, an antenna - a
5 satellite antenna for - we used to get satellite television.
6 This is - it's holding the dish.

7 Q. The dish?

8 A. Yeah, the dish.

11:21:09

9 Q. Now, Mr Taylor, is there a connecting door between your
10 premises and the white building on the other side of the fence;
11 do you follow me?

12 A. Yes. There is no connecting door.

13 Q. For you - for someone to leave from within your premises to
14 go into the SSS building, what do you physically have to do?

11:21:26

15 A. Well, he will have to come out of the front gate and
16 enter - you see here, this is a road here. You have to come out
17 of the front gate and drive down the hill here to get to this
18 building.

11:21:47

19 Q. And that road that we - as you call it, to the right - and
20 we can see a red car just peeping from around the corner of the
21 white building. If one were to go up that road, what do you come
22 to?

23 A. As soon as you go up this road, you come straight on Tubman
24 Boulevard.

11:22:05

25 Q. Okay. We will see that in a moment. Let's put DP-159 on
26 one side and let's go to the next one.

27 JUDGE SEBUTINDE: Mr Griffiths, just to be clear, we were
28 looking at photograph of Mr Taylor's personal residence, not
29 official residence?

1 THE WITNESS: This is what is called White Flower,
2 your Honour.

3 JUDGE SEBUTINDE: It's your personal residence?

4 THE WITNESS: It's my personal residence, your Honour.

11:22:37

5 MR GRIFFITHS:

6 Q. And this is quite different from the Executive Mansion?

7 A. That is correct.

8 Q. The Executive Mansion is in downtown Monrovia?

9 A. That is correct.

11:22:44

10 Q. Right. Let's go over to DP-160. What are we looking at
11 here, Mr Taylor?

12 A. This is just an outside walk veranda from - I would say it
13 looks like from the second floor of the building, just at a --

11:23:11

14 Q. Mr Taylor, just so that we can locate what we are looking
15 at, take that photograph out for a minute, DP-160, all right?
16 And can I invite people's attention back to DP-159? Now, DP-160,
17 where is that on DP-159. Do you follow me?

18 A. Yes.

11:23:40

19 Q. So keep DP-160 in your right hand so you can locate it, and
20 tell us what part of DP-159 are we looking at in DP-160?

21 A. That would be one of these verandas here. Like this red
22 structure - this red structure here, this looks like one of these
23 verandas here.

24 Q. Okay. Right. Thank you. I hope that's clear to everyone.

11:24:12

25 Put DP-160 away now, please, and let's go to DP-161. Now,
26 DP-161, Mr Taylor. And again it might be useful if we keep
27 DP-159 to one side, okay?

28 A. Yes.

29 Q. Now, where is the photographer standing in DP-161,

1 Mr Taylor, in relation to DP-159? I apologise for this being so
2 complicated.

3 A. No, it's okay. I can deal with this.

11:25:11

4 Q. Now, indicate, first of all on DP-159, from where DP-161 is
5 being taken; do you follow me?

6 A. Yes. The structure that we see here, this is the edge of
7 the swimming pool that is looking down at the back. So if we
8 look at 159, that swimming pool is up here.

11:25:37

9 Q. All right. Well, just for our purposes, Mr Taylor - it
10 will become clearer in a minute - just indicate where on 159 the
11 photographer is standing to take DP-161.

12 A. The photographer must be standing - I would say he must be
13 standing - from the end that I am seeing on 161, he must be
14 outside here on the veranda of the second floor to look over and

11:26:08

15 take that shoot as suggested.

16 Q. So he is on the second floor veranda at the back of --

17 A. The main building.

18 Q. -- DP-159 that we can see, yes?

19 A. Yes.

11:26:21

20 Q. And he is looking down?

21 A. That is correct.

22 Q. Okay. Fine. What I wanted us to do now - now what we have
23 located where the photographer is, let's just concentrate on
24 DP-161 now, shall we?

11:26:35

25 A. Yes.

26 Q. Okay. Start from the left. Mr Taylor, where we see that
27 area of red on the ground, what are we looking at there?

28 A. Right here?

29 Q. Yes.

1 A. That's a part of the tennis Court that we are looking at
2 now.

3 Q. So now we are got our bearings.

4 A. Yes.

11:27:01 5 Q. And so beyond the tennis courts where we see what appears
6 to be a white wall, what is that?

7 A. Here?

8 Q. Yes.

11:27:10 9 A. This is now - you are looking at the rear of the concrete
10 fence structure.

11 Q. Right. So that's the back wall?

12 A. That is correct.

13 Q. Okay.

14 A. Yes.

11:27:18 15 Q. Now bring your pen down the photograph towards the
16 photographer, please. Stop. That looks like the roof of
17 something. Is that the roof of what you described in 159 as the
18 squash court?

19 A. This is the roof of the squash court, yes.

11:27:38 20 Q. Right. Come forward again. Now you are at the swimming
21 pool, right, which has been emptied?

22 A. That is correct.

23 Q. Now it follows then, right, Mr Taylor, the swimming pool is
24 on a higher level than the squash court?

11:27:56 25 A. Definitely.

26 Q. Right. Now, before we leave, there is a grass area to the
27 right of the tennis courts, yes?

28 A. That is correct.

29 Q. And then to the right of the photograph, beyond the middle

1 clump of palm trees, that white wall, is that the wall we looked
2 at in the very first photograph looking up towards the red
3 painted gate to the premises?

4 A. That is correct. This is the wall that we were looking
11:28:33 5 at --

6 Q. That we looked at in the first photograph?

7 A. That the Honourable President of the Court asked about the
8 wire being on top of. This is that --

9 Q. That's that wall?

11:28:41 10 A. That's that --

11 MR GRIFFITHS: Is there a difficulty, Mr President?

12 PRESIDING JUDGE: Yes, I was just going to comment. I
13 thought you said there was nothing on the other side of that
14 wall. It looks as though there - nothing by way of houses, I
11:28:58 15 mean.

16 THE WITNESS: No. Immediately after that wall, I'd say for
17 about 100 feet, are banana trees immediate to the wall. But
18 there are buildings that follow, but the question was immediate
19 to that wall, and I said for about 100 yards there are banana
11:29:15 20 trees, and we will see in it in another picture.

21 MR GRIFFITHS:

22 Q. But what's that building which appears to be just the other
23 side of the wall?

24 A. It's not just on the other side. When we get another
11:29:23 25 picture you will see it is some distance. There is a grove that
26 you will see here that this - immediate to the wall, there are no
27 buildings close to this wall. This is a building - remember,
28 when we get down in the valley, we showed a building, that is the
29 top of that building. There is a distance and we will see it in

1 another picture. There is nothing immediate to that wall.

2 Q. Okay. Right. Mr Taylor, let's go to DP-162. Now --

3 PRESIDING JUDGE: We've got two minutes. I am just
4 wondering whether --

11:30:03 5 MR GRIFFITHS: I don't think there is any point in starting
6 on this one now because there is a fair amount to get our
7 bearings with on this one as well.

8 PRESIDING JUDGE: We will take the morning break now and
9 resume at 12.

11:30:20 10 [Break taken at 11.30 a.m.]

11 [Upon resuming at 12.00 p.m.]

12 MR GRIFFITHS:

13 Q. Right. Mr Taylor, before the short adjournment we'd looked
14 at DP-161. Do you recall that? And effectively we were looking
12:03:35 15 at a view of the deep end of the swimming pool looking beyond the
16 wall to the right of the building as one looks towards the rear,
17 yes?

18 A. Yes.

19 Q. Now let's move to DP-162. Now, Mr Taylor, what we're
12:04:03 20 looking at here is the opposite end of the swimming pool, aren't
21 we?

22 A. That is correct.

23 Q. This is the shallow end of the swimming pool, yes?

24 A. That is correct.

12:04:14 25 Q. And just beyond the swimming pool looking towards the back,
26 that's the top of the squash court?

27 A. That is correct.

28 Q. Then beyond that we can now get a clearer view of the
29 tennis court that we looked at, yes?

1 A. That is correct.

2 Q. And then we see the rear wall, yes?

3 A. Yes.

4 Q. And then we see areas of green towards the back, yes?

12:04:39 5 A. That is correct, yes.

6 Q. And just for completeness, to the left: SSS headquarters,
7 top floor, yes?

8 A. Yes.

9 Q. Yes?

12:04:49 10 A. Yes, this building.

11 Q. That building?

12 A. Yes.

13 Q. Just so we can get an idea, Mr Taylor, we might not be able
14 to see it, but as we look in this view are we looking anywhere

12:05:07 15 towards Benjamin Yeaten's house?

16 A. No. No, not at all. Benjamin Yeaten's house would be the
17 other side of this wall, far off this. This is the left. We're
18 looking towards Monrovia city on this side.

19 Q. I'll tell you what we'll do then. Can we just briefly go
12:05:31 20 back to DP-162, bearing in mind what you've just said. 161,
21 sorry.

22 A. Yes.

23 Q. Now, this is the view of the other end of the swimming
24 pool, yes, the deep end?

12:05:46 25 A. That is correct.

26 Q. Now, Mr Taylor, can we see the general area of Benjamin
27 Yeaten's house from this?

28 A. No, not - it is further towards the right going to this
29 direction.

1 Q. Of that photo as well?

2 A. That is correct. And because of the President's question,
3 following this wall there's an orchard. Remember the first
4 picture that was shown to me, there was a road going down. That
12:06:14 5 road is also here. That road - between that dirt road and this
6 fence is that orchard, the plantain and bananas I'm talking
7 about. So further towards this side you'll find that road. And
8 your question: Benjamin Yeaten's house is still in this
9 direction.

12:06:36 10 Q. Okay. Maybe as we go through the photographs we might get
11 a better view. All right. Can we take that one away and can we
12 now put up, please, DP-163. Now, Mr Taylor, I'm hoping that now
13 that we've reached this stage we can move slightly quicker.
14 Remember the President asking about the wire on top of that wall?

12:07:17 15 A. That is correct.

16 Q. Is this the same wall we're looking at?

17 A. Yes. This now is the wall, but now we are looking from the
18 front of the building looking down and so the wall is - this is
19 that same wall the President asked and these are the same wires.

12:07:34 20 Q. Okay. Now the structure to the left of this photograph,
21 Mr Taylor, is that your office?

22 A. That is correct.

23 Q. So these steps leading up here, yes?

24 A. Yes.

12:07:47 25 Q. The photographer at this point has got his back to the
26 front gate that we looked at in the first photograph?

27 A. That is correct.

28 Q. The red painted gate, yes?

29 A. That is correct.

1 Q. So as one comes from that red painted gate in photograph
2 number one you can access your office up those stairs?

3 A. That is correct.

4 Q. Yes?

12:08:10 5 A. That is correct.

6 Q. And then if we look carefully, just to the left of the
7 first flight of stairs we can see the vehicle, the rear of which
8 was on the upper parking area in that first photograph, can't we?

9 A. That is correct.

12:08:28 10 Q. That's that silver looking vehicle. We can just see it
11 through the railings to the stairs, can't we?

12 A. That's right. That's right.

13 Q. Okay. And then as one goes down that driveway, just as you
14 turn around the corner to that building you'd be going towards
12:08:51 15 the swimming pool at the back there, wouldn't you?

16 A. That is correct. When you come down here, this immediate
17 turn you're going into the under - the parking lot, the first
18 parking lot shown.

19 Q. The ground floor parking lot from the back, yes?

12:09:06 20 A. That is correct. The tip of the end that you see here is
21 the structure of the swimming pool, this little tip right here.

22 Q. Right.

23 A. As you continue all the way down there's another red gate.
24 This is the back rear gate - it's also painted red - at the end
12:09:23 25 of this fence.

26 Q. All right. Okay, got it. Let's go to DP-164. Mr Taylor,
27 what are we looking at - let's start from the beginning. The
28 photographer has got his back to what now?

29 A. I'm trying to get my bearings. It's been so long I

1 can't --

2 Q. 164.

3 A. Okay, let me see. The photographer right now is shooting
4 this picture from the rear. He's around the rear fence, the rear
12:10:19 5 top fence. And if you look here, this is part of the answer to
6 the President of the Court's question when he said, "well, I
7 thought you said there was nothing." Here is the beginning
8 there. You see the pawpaw tree and other things? That's the
9 left of that fence that the President asked before, where I said
12:10:43 10 some hundred yards from the fence is a little orchard. Here is
11 that part. Maybe another picture we will see better. But he's
12 at the rear. This is the rear - part of the rear yard of the
13 property. If you look all the way up here, you can still see my
14 office and the front gate.

12:11:02 15 Q. Yes.

16 A. Okay? You cannot fully see the tennis court that is
17 situated here.

18 Q. But the tennis court is beyond that hedge to the right of
19 photograph where the marker is, yes?

12:11:15 20 A. That is correct. So the photographer now has his back
21 turned outside and he's taking this from around, I would suggest
22 it, the top of this concrete fence structure here and taking it
23 looking forward.

24 Q. And just to assist, Mr Taylor. The fence, as you call it,
12:11:45 25 this is the same fence we're looking at which had the electric
26 wire running on the top?

27 A. Yes. As you look here, that is correct, yes. This is the
28 fence continuing. You can see the stages. Every point on this
29 fence is 20 feet. So as the drop occurs, that's why you see

1 these like --

2 Q. Steps down.

3 A. Exactly. Because at every point it is 20 feet, so they
4 have to step down. As they drop, it is stepped down, but still
12:12:16 5 at that point it is still 20 feet high.

6 Q. Okay. But that one away. Let's go to 165. What do we see
7 in 165 now, Mr Taylor?

8 A. This is the final solution to the question asked by the
9 President of the Court. Here is that place I'm talking about
12:12:34 10 here to the left.

11 Q. What place?

12 A. Where I said that there were banana trees, plantain trees
13 and other things. So that's the immediate left side. This is
14 the rear of the property. We're looking to the left side in the
12:12:51 15 area that I was asked about before. Here is that place. Beyond
16 this is that dirt road.

17 Q. Right.

18 A. Yes.

19 Q. And as we can see, because we're now getting familiar with
12:13:07 20 the location, that is the front gate up at the top left?

21 A. That is correct.

22 Q. The red structure, yes?

23 A. That is correct.

24 Q. And we know what everything else, so let's move on.

12:13:15 25 A. Yes.

26 Q. DP-166. Mr Taylor, what are we looking at in DP-166?

27 A. Well, my property is here. These are individuals standing
28 on top of my fence here and you can see how high this is. The
29 building - since I left, there have been apparently some

1 additional work done on - because the property outside here is
2 not my property. This building, the top here is that Secret
3 Service building that has offices at the top. Now I can see some
4 new structures are being made. But these individuals - you can
12:14:05 5 see how high the fence is because it's cut in close. So this is
6 that SSS building. This is it here.

7 Q. Right. So where - the photographer has his back to what in
8 this photograph, Mr Taylor?

9 A. The photographer must have been his back toward Tubman
12:14:22 10 Boulevard and looking --

11 Q. Looking towards the rear of your premises?

12 A. That is correct.

13 Q. But on the left-hand side of the premises, as one looks at
14 it from Tubman Boulevard?

12:14:34 15 A. That is correct.

16 Q. And we can see the top of the SSS building now, yes?

17 A. Yes, yes.

18 Q. Okay?

19 A. Yes.

12:14:41 20 Q. And what are you telling us? You see the two trucks parked
21 at the front of this photograph and the structure behind it. Was
22 that structure behind it there when you occupied White Flower?

23 A. No, no, no. These are new improvements. I understand that
24 the owners of this property outside have leased it out to people
12:15:05 25 and these are all new. This is new. This is new. This is new.
26 These trucks. This is all new.

27 Q. All right. Let's put that one away. 167. We can deal
28 with this one quite quickly. We've now got our bearings. This
29 is another view of the left-hand side looking towards the front

1 of the building with the orchard to the left, yes?

2 A. That is correct.

3 Q. 168, please. What are we looking at in 168, Mr Taylor?

4 A. Wait a minute here. Let me see something. Just a minute.

12:15:58 5 Okay, great. Now, in this picture, the photographer is standing
6 and looking into the direction of Benjamin Yeaten's house that is
7 in this sector down here.

8 Q. So the photographer has got his back to the rear of the
9 building, yes?

12:16:28 10 A. Yes. He's midway here and he's looking at the middle rear
11 right corner across and in this sector is Benjamin Yeaten's
12 house.

13 Q. Right. I think we've all got that, so let's move on. 169.
14 Tennis courts?

12:16:53 15 A. That is correct, yes.

16 Q. 170, tennis court, rear of SSS building, yes?

17 A. Let me see that. Just a minute. That is correct.

18 Q. 171, Mr Taylor. We're looking at the corner of the
19 swimming pool, the top of the SSS building and bottom right-hand
12:17:18 20 corner is the top of the squash court, right?

21 A. That is correct. Now, this picture is being taken with his
22 back apparently turned toward the right of the fence from the
23 boulevard looking toward - here is the SSS building and this is
24 the upstairs back staircase, yes.

12:17:47 25 MR GRIFFITHS: Can I invite everyone now, please, to put
26 that bundle for week 39 away and can we take up the week 40
27 bundle, please. Do we all have it to hand now, week 40?

28 PRESIDING JUDGE: Yes.

29 MR GRIFFITHS:

1 Q. Mr Taylor, I want us to start, please, behind divider 1,
2 okay?

3 A. Yes.

4 Q. First of all, Mr Taylor, who created this hand drawn map?

12:19:02 5 A. I described this map and you did this.

6 Q. On whose directions?

7 A. On my direction. I described it, and on my directions, you
8 put this together.

9 Q. All right. Now, let's just go through it slowly. We have
12:19:29 10 Tubman Boulevard running across the bottom, yes, Mr Taylor?

11 A. That is correct.

12 Q. And if one travels to the left, you go towards central
13 Monrovia, yes?

14 A. That is correct.

12:19:46 15 Q. And if you go to the right, you head towards Roberts
16 International Airport?

17 A. Yes.

18 Q. Right?

19 A. Yes.

12:19:59 20 Q. We have White Flower itself there, don't we, with the
21 swimming pool and the tennis court? And none of this is to
22 scale, is it, Mr Taylor?

23 A. None of it is to scale, that is correct.

24 Q. And then we have the wall which is indicated 20 foot high
12:20:17 25 perimeter fence, yes?

26 A. Yes.

27 Q. Which goes all the way round the tennis court, the swimming
28 pool and White Flower, yes?

29 A. That is correct.

1 Q. Now, the building to the left, is that the SSS building
2 that we spoke about?

3 A. Right there, yes.

4 Q. Okay?

12:20:33 5 A. Yes.

6 Q. And then there's a generator behind it, yes?

7 A. Right there, yes.

8 Q. And then there's a guard house at the back?

9 A. That is correct.

12:20:41 10 Q. And then Benjamin Yeaten's house is down that dirt road
11 which we saw in the first couple of photographs?

12 A. That is correct.

13 Q. Yes?

14 A. That is correct.

12:20:50 15 Q. Okay. And as we can see, as one looks at the front of your
16 premises, the Taiwanese embassy is to the left?

17 A. That is correct.

18 Q. And then, as indicated, there's a slope going down from
19 Tubman Boulevard to the rear of the building, yes?

12:21:10 20 A. Yes. This is that road that we saw that red car that you
21 described peeking at the rear end, that's it. This is that slope
22 going down, yes.

23 Q. Right. Now, photograph DP-173, yes, Mr Taylor?

24 A. Yes.

12:21:37 25 Q. What are we looking at in this photograph?

26 A. We are looking at the front of White Flower.

27 Q. What's the name of the road we can see?

28 A. This is Tubman Boulevard right here.

29 Q. To the right of the photograph there is a red square

1 gateway, yes?

2 A. Yes.

3 Q. Is that the red square gateway we saw from the - looking
4 from the rear of the building looking towards the front?

12:22:11 5 A. That is correct, yes.

6 Q. All right. Now, Mr Taylor, what I want you to do is this:
7 Starting from that side of the building, yes, just describe to us
8 what we can see. Just take us from right to left as we look at
9 the photograph and tell us what we're looking at.

12:22:32 10 A. Here - right here, this is a small door entry. This is a
11 walk-in entry. Here is an SSS - it's a Secret Service post that
12 has, well, these walk-through machines, like a metal detector.
13 This is an office, a little inspection area for walk-through
14 visitors to White Flower. They go through inspection here before
12:23:05 15 entering.

16 Q. So there's a security check in there, yes?

17 A. In here, that is correct. This is the main entry gate that
18 we saw. As we come here, you see there is a staircase going up
19 here. Outside, and totally outside of the fence but connected,
12:23:23 20 this is a sitting area, a post area, for the Secret Service.
21 These are all offices here that are connected outside of the
22 fence. You cannot leave here to enter. This is just an outside
23 sitting post for Secret Service personnel. You can enter from
24 here and exit from this area, where you see the stairs here, or
12:23:48 25 vice versa.

26 Q. So the spiral staircase we can see about an inch and a half
27 from the left of the photograph, that takes you up to that SSS
28 area as well as the stairway we see to the right, yes?

29 A. That is correct.

1 Q. So it can be accessed from either end?

2 A. Either end, that is correct.

3 Q. Right. Now, take us to the other end of the photograph,
4 please.

12:24:14 5 A. This is the exist door, the same size as this, but the
6 angle of the camera, it looks a little smaller, but it's a same
7 size. This is the entry gate. This is the exit gate.

8 Q. And what's above the exit gate?

9 A. Up above here is another - this is a position for the
12:24:35 10 military. There is - inside here, you can't see it, there's a
11 winding staircase that you access the top of the fence where the
12 military walk up and change - here, these are flag posts. The
13 military access through this top part here. They have to put up
14 the flag and take it down, so they access it from in here and get
12:25:02 15 on top to change the flag and take the flag down at 6 in the
16 evening.

17 Q. Right. Now, beyond that exit gate we see a white painted
18 wall with some trees in front of it. What are those premises?

19 A. Beyond here --

12:25:25 20 Q. What's behind that wall where your pen is? What's behind
21 that wall?

22 A. That's the Taiwanese embassy.

23 Q. That's the Taiwanese embassy?

24 A. Yes.

12:25:44 25 Q. And, Mr Taylor, whilst we're here, we're look at the front
26 of your premises, yes?

27 A. That is correct.

28 Q. Now, the SSS building which we saw when we looked at the
29 other photographs, the two-storey building with the warehouse,

1 yes?

2 A. Yes.

3 Q. Is that behind what you've indicated is the Taiwanese
4 embassy?

12:26:08 5 A. I wouldn't say behind. It is down in here, but it's not
6 directly behind the embassy. That building is somewhere between
7 this left fence and the back of the embassy.

8 Q. Very well. Let's move on to DP-174. Where are we now,
9 Mr Taylor?

12:26:42 10 A. You are inside of the fence. This is at the very - this
11 shot is the very front door of my house.

12 Q. Now, Mr Taylor, the structures we looked at in the previous
13 photograph, 173, the front of the house, yes?

14 A. Yes.

12:26:58 15 Q. In DP-174, is that structure now behind the photographer?
16 Remember we were looking at the front of the building and you
17 indicated where the SSS offices were at the front?

18 A. That's the behind the photographer, yes.

19 Q. So that's behind the photographer in DP-174, yes?

12:27:25 20 A. Yes.

21 Q. So one has come through the entry gates, yes?

22 A. Yes.

23 Q. And, effectively, we're now in the front garden looking at
24 the front door?

12:27:35 25 A. Yeah, at a portion, yes. It's a close shot.

26 Q. 175, please. This is a close-up of the front door, yes?

27 A. Yes, just the front door, yes.

28 Q. So based on what you've told us already, Mr Taylor, your
29 office is to the right of the front door as we look at it?

1 A. That is correct.

2 Q. Yes?

3 A. That is correct.

4 Q. And the parking areas that we looked at where that silver
12:28:09 5 car was parked, that's the right of what we're looking at, yes?

6 A. That is correct.

7 Q. Okay. Let's look at 176. I needn't stay for long.

8 Close-up front door, yes?

9 A. That is correct.

12:28:25 10 Q. 177. Now, the photographer in this one, am I right, still
11 has his back to the front of the building, he's looking to the
12 right of the front door, and tell us what we can see to the right
13 of that photograph, Mr Taylor.

14 A. Okay. Here what we can see, this is another section of the
12:28:49 15 front. This is the fountain at the front right before the front
16 door. And may I add, it is at the front door which is the inlet
17 parking. You're looking at the fountain. This is the fountain.
18 That's all we can see here. Well, when we get to it we will see
19 this structure a little clearer. But the first structure that we
12:29:19 20 saw is in front of this fountain. You can't see it in this
21 picture. There's another like Mary holding a baby in the front
22 of this.

23 Q. Now, to the right of the photograph we see some vehicles
24 parked, Mr Taylor?

12:29:35 25 A. Yes.

26 Q. Is that the upper parking area?

27 A. That is correct. What we saw in that former picture, yes.

28 Q. And what's above where we see those cars parked?

29 A. My office. The same offices that we - my private study,

1 that's where it is.

2 Q. Right. So now we're getting our bearings, all right?

3 A. Yes.

4 Q. DP-178, please. Fountain, front door, yes?

12:30:17 5 A. That is correct.

6 Q. Balcony area above front porch?

7 A. That is correct.

8 Q. Am I right?

9 A. That is correct, yes.

12:30:30 10 Q. 179, please. Again we can move fairly swiftly. Now,
11 Mr Taylor, starting from the right of the photograph, yes?

12 A. Yes.

13 Q. We've got the driveway - circular driveway coming in from
14 the entrance gate, yes?

12:30:58 15 A. That is correct.

16 Q. That circular driveway goes under the porch area by the
17 front door?

18 A. That is correct.

19 Q. Yes. What we see now is the upper parking area, right?

12:31:13 20 A. That is correct.

21 Q. With your office above?

22 A. That is correct.

23 Q. With the Liberian emblem in the centre?

24 A. That is correct.

12:31:22 25 Q. Right?

26 A. That is right.

27 Q. And so from the front of the building it looks like a
28 two-storey building, yes?

29 A. That is right.

1 Q. Because of the slope. But as we know, when you get to the
2 back it's actually on a lot more levels, yes?

3 A. Two other levels down, that is correct.

12:31:57

4 Q. And DP-180, the next photograph, illustrates that, because
5 now we see rear of offices, yes?

6 A. That is correct.

7 Q. And that as one comes to the back, there is a lot more to
8 the building than meets the eye from the front?

9 A. That is right.

12:32:08

10 Q. And 181 again further illustrates that, yes?

11 A. That is correct. Now, 181 actually shows - we talked about
12 the squash court. Here it shows the entry to the squash court.

13 As you come down, this is the entry. This is the top. The

14 swimming pool is right here, and it shows the rest of the

12:32:36

15 building.

16 Q. That's DP-181. 182: Self-explanatory, Mr Taylor?

17 A. That is correct. This is the back lawn of that - part of
18 it. We can't see this. To your right is the tennis court and to

19 the left is the same fence --

12:33:05

20 Q. That's the one that we saw the wire on top of?

21 A. That is correct.

22 Q. And it's the orchard beyond that to the left, right?

23 A. That is correct.

24 Q. Okay. And we have to the left beside the wall a driveway
25 running from the top entry gate, yes?

12:33:20

26 A. That is correct.

27 Q. And remember the hand-drawn plan we looked at, Mr Taylor?

28 A. Yes.

29 Q. If one goes down that driveway into the bottom left-hand

1 corner of the photograph you get to that guard house, which we
2 marked on the plan, don't we?

3 A. You have to go through the gate.

4 Q. You go through a gate and you get to the guard house, yes?

12:33:47 5 A. That is correct.

6 Q. 183: Self-explanatory, yes?

7 A. Yes.

8 Q. Right. We're on the swimming pool level - well, we're just
9 below the swimming pool level looking at the back of the

12:34:10 10 building, yes?

11 A. That is correct.

12 Q. 184, we've come in through the entry gate?

13 A. Yes.

14 Q. And there's the driveway towards the front door?

12:34:21 15 A. That is correct.

16 Q. With the steps leading up to the office on the right?

17 A. That is correct.

18 Q. And we can see the Liberian emblem in front of the window
19 to your office?

12:34:34 20 A. That is right.

21 Q. DP-185, self-explanatory?

22 A. If you don't mind, counsel, could we just show DP-184?

23 Q. Okay, DP-184.

24 A. This is the drive. This here I just wanted to mention.

12:35:06 25 This is a statue. It's looking - it's looking small - it's a
26 very huge statue. This is an African statue of a man, a hunter -
27 a man coming in with an animal. And, of course, we know that
28 right over here is the fountain and this - and another third
29 statue with the woman holding - Mary holding the baby. I wanted

1 to just mention here, because in relations to another witness
2 that was brought before this Court that he was brought into White
3 Flower and I came down in my nightclothes or something, and a
4 question was asked by the Defence if he could identify anything,
12:35:52 5 and he couldn't. This is a huge statue here. This is also a
6 huge fountain plus Mary and --

7 Q. Right. Just to see what you're talking about, let's go
8 back to DP-178. DP-178, Mr Taylor, what was it you were pointing
9 out to us?

12:36:45 10 A. There was a Prosecution witness that is protected that came
11 here and said - he explained all of his ordeal that he had,
12 nearly killed at Gbatala at the base, brought to me, I came down
13 in the night and ordered them to take him out and kill him, and
14 he's supposed to survive all the ordeals but --

12:37:06 15 Q. He's the one who escaped from a pit in the ground.

16 A. That is it. And he was asked a specific question as to
17 whether he had been into my yard and what he had seen. I raise
18 this because when you enter this yard, there is tremendous light.
19 All of these are huge statues. He did not describe it. I just
12:37:25 20 bring this matter up because this is the first time the judges
21 are seeing this front entrance to my house. And this witness
22 said that I was supposed to have come down in my robe and ordered
23 him to be taken to the beach or wherever he described - I'm
24 paraphrasing - and be killed.

12:37:42 25 Q. Just for reference, TF1-590. Right. Let's go back to -
26 we'd got as far as DP-185. Let's go back to that now, please.
27 Self-explanatory, Mr Taylor?

28 A. Yes. This is looking toward the - this is the service
29 entry here, the kitchen area. This is a service entry here. The

1 front door is, of course, here. This is the exit going out. But
2 this is a service entry for the cooks and different things.

3 Q. Mr Taylor, I am not personally quite sure what we're
4 looking at here, right?

12:38:33 5 A. Yes.

6 Q. So let's take this one slowly?

7 A. Good.

8 Q. The wall to the left - yes - what's on the other side of
9 that wall?

12:38:42 10 A. On the other side of this wall is that driveway down to go
11 to the SSS place, and further down is the Taiwanese embassy to
12 the left of this wall.

13 Q. Right. And this in the middle of the photograph with what
14 appears to be some kind of domestic appliance on the ground,

12:39:06 15 what's that?

16 A. I don't know how they - this looks like a stove or
17 something. I didn't leave it there. But here is a door that
18 accesses the top of this building. You can come through this
19 door, climb up stairs, and come and walk anywhere on the top of

12:39:24 20 this building to reach these outlook positions. Here is a
21 service entry into the kitchen here. So we're just looking to
22 the little left side of the house. This is all one structure and
23 this is the exit that - entry that comes around, this is that
24 exit part, and this is the service entry to the kitchen.

12:39:47 25 Q. All right. Go back to it, Mr Taylor.

26 A. Yes.

27 Q. To the right of the photograph, the structure which appears
28 to be on two concrete plinths, what is that?

29 A. Right under here is the front door. The very front door

1 that we looked at. The front door is right here.

2 Q. Right. So, Mr Taylor, am I right then - if you could just
3 look at me for a moment. This is the driveway coming round that
4 way --

12:40:17 5 A. That is correct.

6 Q. -- under the porch area?

7 A. Yes.

8 Q. And then back out to the front gate?

9 A. That is correct.

12:40:24 10 Q. All right. Got you.

11 JUDGE SEBUTINDE: The figure of a person, I think whose
12 legs we can see sort of near the bottom right-hand corner, that
13 is the front door? He's standing by the front door?

14 THE WITNESS: Here?

12:40:46 15 JUDGE SEBUTINDE: Well, I can't see --

16 THE WITNESS: No, the front door, your Honour, is under
17 here. You can't see?

18 JUDGE SEBUTINDE: Do it again, please. Show us.

19 THE WITNESS: The front door of my house is here.

12:41:00 20 JUDGE SEBUTINDE: Yes. Those are the legs I'm referring
21 to. If you look carefully, legs of a person.

22 THE WITNESS: Yes, your Honour.

23 JUDGE SEBUTINDE: Thank you.

24 MR GRIFFITHS: Okay, Mr Taylor. Do we all understand
12:41:13 25 photograph DP-185, now? Good.

26 Q. Well, let's go and look at DP-186. Now that we've got our
27 bearings, Mr Taylor, fairly straightforward, isn't it?

28 A. Yes.

29 Q. We've now got the fountain to our right. We see the figure

1 of Mary holding child, yes?

2 A. Yes.

3 Q. And we're looking back towards your office, yes?

4 A. That is correct.

12:41:54 5 Q. Now, Mr Taylor, when someone, for example, say a government
6 minister, came to see you at your address, what part of the
7 premises would they come to? Would they come to your front door,
8 would they go to the office? What would happen? Just explain.

9 A. The government minister would drive in, he would disembark
12:42:18 10 here at the front door, and he would be taken to me. Directly on
11 this floor is all a receiving area. Inside there would be a
12 receiving area. If it's probably in the evening hours, if I'm in
13 my studies he would be taken upstairs to my study.

14 Q. Okay.

12:42:44 15 A. And the car will leave. Now - and I mention this because
16 it was being portrayed that somebody was being treated as though
17 he was nothing - and I think referring to Blah. This, if you
18 look at it, the procedure here, you will drive in, disembark, the
19 car will drive out. There's no parking space in here. The only
12:43:08 20 vehicles that park here are my personal vehicles. So it was not
21 because somebody was being treated any less than his position,
22 but because that was the procedure. You drive in, you disembark,
23 the car drives out. Minutes before you are about to leave the
24 car is called back in, and you come back through. That was the
12:43:30 25 procedure.

26 Q. All right. Let's move quite swiftly now. I think we've
27 got as far as 187, have we?

28 PRESIDING JUDGE: We have now. I don't think you've dealt
29 with it yet.

- 1 MR GRIFFITHS: Thank you, Mr President:
- 2 Q. 187, Mr Taylor, straightforward, yes?
- 3 A. Yes.
- 4 Q. We know where we are, office, yes?
- 12:44:01 5 A. That is correct.
- 6 Q. Parking area below?
- 7 A. Yes.
- 8 Q. 188, yes?
- 9 A. Yes.
- 12:44:08 10 Q. We know where we are?
- 11 A. We do, yes.
- 12 Q. And the driveway to the right, we see at the end of that
- 13 driveway a red square, yes?
- 14 A. That is correct.
- 12:44:23 15 Q. What is that?
- 16 A. That's the rear exit gate.
- 17 Q. And that rear exit gate goes to where?
- 18 A. It goes out, and at the end here there is a road that
- 19 continues on to - this place is something like a little island.
- 12:44:42 20 The Foreign Minister lived back here. So you enter, you exit,
- 21 there's that road. Remember when the first picture was shown to
- 22 the Court, that dirt road that came down this way, it turned - it
- 23 had a T shape. The right went to the Benjamin Yeaten area and
- 24 there are many houses. The left went toward the Foreign
- 12:45:07 25 Minister, where the Foreign Minister lived, back here.
- 26 Q. And can we see that guard house which you asked me to draw
- 27 on that hand drawn diagram, Mr Taylor?
- 28 A. In this picture, no, we can't see it.
- 29 Q. But where is it?

1 A. That guard house would be right after this gate outside.
2 The buildings you are looking at now are at a little distance.
3 This is on the island we're looking at it. But to see that guard
4 house, you have to be immediately after this red gate and
12:45:43 5 outside. You had the guard house, you had other people. In
6 fact, behind here, the deputy director, Joseph Montgomery, lives
7 back here. Aide-de-camp, Musa N'jie, lives back here. There are
8 buildings at the back here.

9 MR GRIFFITHS: I think can we put those photographs away.

12:46:15 10 Now, Mr President, we also have a short DVD traversing the
11 whole area. I wonder if that could be shown at this moment,
12 please, which will put everything in perspective and then we'll
13 end this chapter.

14 PRESIDING JUDGE: Yes, that can be shown.

12:47:18 15 MS IRURA: Please press PC-2 on the control panel in front
16 of you, but the AV booth will show the video automatically.

17 PRESIDING JUDGE: I take it you want it shown now,
18 Mr Griffiths?

19 MR GRIFFITHS: Yes, please.

12:48:41 20 [Video played to the Court]

21 MR GRIFFITHS:

22 Q. [Microphone not activated] the right of the front door a
23 plaque bearing the word "Villa Yassa Zoe 1997", what does the
24 name and the date refer to?

13:01:03 25 A. Yassa Zoe is the name of my late mother. The year is the
26 year that I bought the property from the owner. The property was
27 originally built by the late Lawrence Morgan and a little before
28 I was elected President in early 1997 I bought it and named it
29 after my mother.

1 Q. And when did you move into the property?

2 A. I completed it by late 1998 and by January of 1999 I moved
3 into it. All of the structure of the offices - the upstairs
4 offices, those were not part of the structure. The walkway that
13:01:50 5 you described from - that goes actually almost into my bedroom
6 into the study, those were all parts constructed. The building
7 was not completed when I bought it in 1997. I completed it
8 throughout 1998 and moved in in January 1999.

9 MR GRIFFITHS: Mr President, given the amount of time we've
13:02:12 10 spent on this I don't know if there are any questions which arise
11 from the Bench which we could clarify at this stage before I go
12 on to ask for these photographs to be marked for identification.

13 PRESIDING JUDGE: I'll ascertain that now, Mr Griffiths.
14 There's nothing from the Bench.

13:02:30 15 MR GRIFFITHS: Very well. Mr President, can I ask then,
16 please, that the 36 photographs and one hand drawn diagram, and I
17 hope my sums are correct, be marked for identification MFI-264
18 and that would be - can we designate them A, B, C and so on until
19 we get to 26 and then AA and that way, Mr President?

13:03:02 20 PRESIDING JUDGE: Yes.

21 MR GRIFFITHS: It starts at DP-154.

22 PRESIDING JUDGE: That's MFI-264A.

23 MR GRIFFITHS: 155 would be B. 156 will be C. 157 D. 158
24 E. 159 F. 160 G. 161 H. 162 I. 163 J. 164 K. 165 L. 166
13:03:56 25 M. 167 N. 168 O. 169 P. 170 Q. 171 R. And then we go to the
26 hand drawn plan which would be S. Then DP-173 where we pick up
27 again will be T. 174 U. 175 will be V. 176 will be W. 177
28 will be X. 178 Y. 179 Z. 180 will then be AA. 181 will be BB.
29 182 will be CC. 183 will be DD. 184 will be EE. 185 FF. 186

1 GG. 187 HH. 188 II. Finally 189 will be JJ.

2 PRESIDING JUDGE: Why don't we make the DVD a separate -
3 rather than have it linked in with the photographs.

13:05:55

4 MR GRIFFITHS: Okay. So we will have the DVD as MFI-265
5 then, Mr President.

6 PRESIDING JUDGE: Yes, that DVD is marked for
7 identification MFI-265.

8 MR GRIFFITHS: Okay, Mr President?

9 PRESIDING JUDGE: Yes.

13:06:14

10 MR GRIFFITHS:

11 Q. Mr Taylor, I want to go through a similar exercise which
12 I'm hopeful we can do fairly swiftly and conclude before the
13 luncheon adjournment and that's to look at some other

13:06:40

14 photographs. Can I ask everyone, please, to put away the two
15 bundles of photographs in relation to White Flower and could we
16 now take up, please, a bundle of photographs, week 44, and can I
17 say right at the outset for the assistance of Court Management
18 staff that I want us to exercise some care with this bundle.

13:07:10

19 Under no circumstances must the photographs behind dividers 1 and
20 2 be made public.

21 So the first photograph I want us to look at is behind
22 divider 3. It should be DP-191. Mr Taylor, what are we looking
23 at in that photograph, please?

13:08:12

24 A. This photograph, I can't point it out, do I have the
25 permission to move?

26 Q. Yes, please. My fault.

27 A. Thank you. This photograph that we are looking at is now
28 in Gbarnga and this is the building that has been referred to,
29 that was destroyed, as the Executive Mansion in Gbarnga. This is

1 the building.

2 Q. Now I just want us to pause.

3 JUDGE SEBUTINDE: Did you mean that was destroyed or that
4 was not finished? Which is it?

13:08:59 5 THE WITNESS: No, the Executive Mansion in Gbarnga was
6 destroyed at the time that ULIMO attacked Gbarnga and captured it
7 in 1994. While I was at Akosombo it was destroyed.

8 MR GRIFFITHS:

9 Q. Which year was that, Mr Taylor?

13:09:22 10 A. 1994.

11 Q. It may have been destroyed, Mr Taylor, but as we go through
12 the photographs is the fundamental structure as it was when you
13 occupied it?

14 A. Yes. This is the fundamental structure. What is absent is
13:09:41 15 the roof. The roof is off. That was not replaced. This is the
16 structure that --

17 Q. As it was?

18 A. That is correct.

19 JUDGE SEBUTINDE: So this is a recent photograph or this is
13:10:00 20 a picture taken way back then?

21 THE WITNESS: Recent. This is a recent photograph.

22 MR GRIFFITHS:

23 Q. Now, Mr Taylor, taking matters slowly, firstly how many
24 storeys did this Executive Mansion have in Gbarnga?

13:10:21 25 A. One floor. This is it.

26 Q. And what part of the building are we looking at in this
27 photograph DP-191?

28 A. Here is the very front entrance of the building, right
29 here. If you see this little drive up, this is where cars drove

1 right up, stopped on top of this, it looks rounded but it's flat,
2 and guests got out and walked into the building.

3 Q. So where is the main entrance?

13:11:06

4 A. You see where these guys are standing - this person in the
5 red T-shirt, the entrance is right through there.

6 Q. So this photograph DP-191 depicts, does it, the front area
7 of the Executive Mansion in Gbarnga, yes?

8 A. Yes.

13:11:42

9 JUDGE SEBUTINDE: I'm sorry to ask again, Executive Mansion
10 meaning official residence?

11 THE WITNESS: Yes, your Honour.

12 JUDGE SEBUTINDE: Not private residence?

13:11:59

13 THE WITNESS: No, your Honour. This building was a
14 building used by the we call it superintendent or in other areas
15 they may call it governor of the county, Gbarnga is the capital.
16 I lived in this building. It is called Executive Mansion because
17 at that time wherever the leader lived it was referred to as the
18 mansion. It was not a mansion mansion. They just described it
19 because that's where the leader lived.

13:12:25

20 MR GRIFFITHS:

21 Q. Now, Mr Taylor, on that note, just so that we're clear,
22 this building, was it a building you lived in or was it a
23 building which only served as an official function as --

24 A. I lived in this building.

13:12:40

25 Q. You lived in this building?

26 A. Yes.

27 Q. Did you have offices in this building?

28 A. Yes.

29 Q. So did you conduct all of your business as leader of the

1 NPFL as you then were in this building?

2 A. That is correct.

3 Q. And whilst we're looking at this photograph, at least in
4 the shot we're looking at we see no other structures apart from
13:13:10 5 this building. Were there other structures around this building
6 at the time you occupied it?

7 A. Yes, many. You can't see it in this, this is a close shot,
8 but there are other structures. There is a low concrete - I keep
9 calling it fence. A low concrete structure I would say about 5
13:13:39 10 feet high, a very low structure, that circles this. The building
11 itself is situated I would say on at least an acre and a half
12 that is fenced in, enclosed, but there is this one building in
13 that enclosure.

14 Q. Okay. So that's DP-191. Let's go to DP-192, over the
13:14:13 15 page. Mr Taylor, what are we looking at now?

16 A. Let me see here. This is the same building.

17 Q. What part of it are we looking at?

18 A. It looks like we are looking at a side view of this
19 building.

13:14:52 20 MR GRIFFITHS: Could you return DP-191 to the witness,
21 please:

22 Q. Keep that in your left hand for reference, Mr Taylor, and
23 then help us, the view in DP-192, what are we looking at?

24 A. We're looking at the front of the building. This building,
13:15:09 25 I described it here before. What you see up front here, these
26 are offices. To the right is a sitting room for receiving
27 people. Now, there is a hallway that runs at the end of this
28 into another structure where it's the family living quarters. So
29 in this other picture --

1 Q. Right. Put that one back up now, DP-192.

2 A. Okay. What you are looking at now is the extension into
3 the family living quarters.

4 Q. So just take us through from left to right as we look at
13:15:47 5 this photograph. The building on the left, what is that?

6 A. Front offices. Front entrance.

7 Q. So that's what we saw in the other photograph?

8 A. That is correct.

9 Q. Then what we are looking at at the back?

13:16:01 10 A. You're looking at the walk through and then the family
11 quarters.

12 Q. So we're looking at the living quarters then, yes?

13 A. That is correct.

14 Q. Okay. I think we've all got that now. Right. Let's go to
13:16:14 15 DP-193, please. What are we looking at now, Mr Taylor? Take us
16 this time from right to left.

17 A. Okay. You are looking at the front entrance and you are
18 looking at the left side of the yard. So you're still looking at
19 the - in this section, you see this is an entrance. You have a
13:16:40 20 kitchen here and sitting quarters, and behind here you are
21 looking at the living quarters.

22 Q. Right. Got it. So what we're looking at then is a side
23 elevation of the building?

24 A. That is correct.

13:16:55 25 Q. Okay. Let's put up DP-194 now, please. Right, Mr Taylor,
26 what are we looking at now?

27 A. That's about similar to one of the previous ones. You're
28 looking at the very tip end of the entrance and you're looking at
29 the family living quarters.

1 Q. All right. Let's not tarry then. DP-195?
2 A. Similar. This is the front and you're looking again at -
3 okay, now, this is the section here where guests that are coming
4 in would sit in here, and again back here you are looking at the
13:17:55 5 living area.
6 Q. Okay. 196, please. Yes, Mr Taylor?
7 A. Still the side. This is still the left side coming from
8 the front.
9 Q. 197, please?
13:18:28 10 A. This picture here is part of the structures at the training
11 base at Gbatala.
12 Q. So DP-197 is where?
13 A. This is the training base. This is one structure at the
14 training base at Gbatala.
13:18:57 15 Q. So training base Gbatala, yes?
16 A. That is correct.
17 Q. DP-198?
18 A. Same thing, training base at Gbatala. It's one of the
19 structures.
13:19:32 20 Q. DP-199?
21 A. Same thing, training base at Gbatala.
22 Q. 200?
23 A. Still Gbatala, yes.
24 Q. 201, Mr Taylor?
13:20:08 25 A. Gbatala. This looks like the chapel at Gbatala.
26 Q. 202?
27 A. This is the party headquarters of the ruling party at the
28 time, the National Patriotic Party in Gbarnga.
29 Q. So DP-202 is what?

1 A. The headquarters of the National Patriotic Party in
2 Gbarnga, Bong County.

3 Q. So HQ NPP party in Gbarnga?

4 A. That is correct.

13:21:05 5 Q. DP-203, please?

6 A. This is again Gbarnga, Bong County. This is the building
7 hosting the administrative headquarters of Gbarnga and Bong
8 County. This is where the - all county workers and officials
9 they have their offices here, administrative headquarters.

13:21:37 10 Q. Now, was this structure used by your administration when
11 you were based in Gbarnga?

12 A. Yes.

13 Q. For what purpose?

14 A. In the NPRAG, ministers, county officials, county
13:21:53 15 commissioners all had their offices. Their offices remained
16 there. We did not remove them.

17 Q. DP-204, please.

18 A. This is my house, unfinished, at my farm.

19 Q. So this is the unfinished house of Charles Taylor at his
13:22:25 20 farm near Gbarnga?

21 A. That is correct.

22 Q. Now let me just ask you something else about that before we
23 move on. When did you start constructing this building,
24 Mr Taylor?

13:22:51 25 A. In 19 - I would say late 1998/early '99.

26 Q. And how far did you get with the construction work?

27 A. Right there. No further.

28 Q. So at the time when you used to visit the farm, where did
29 you used to stay?

1 A. There was a smaller house off here. We don't see it. And
2 we don't have a picture of it because it was destroyed during the
3 war. And I said to the Court, these are very, very recent
4 pictures. All of the pictures we've seen here are not even three
13:23:41 5 months old. They're very recent pictures. So you cannot see
6 that house, but I used to live not too far from this structure.
7 And I did not finish this, because you will hear about this farm
8 in Gbarnga, it's another point of contention that we really
9 haven't gotten into. I did not start the farm in Gbarnga until
13:23:59 10 '98, late '98. This structure now has to be about late '98/early
11 1999. So even some of the references to this farm, if we get
12 specific to the dates, we would have some questions about that.

13 Q. All right. DP-205, Mr Taylor?

14 A. This is still the house, my house at the farm in Gbarnga.

13:24:31 15 Q. Unfinished house?

16 A. In Gbarnga.

17 Q. DP-206?

18 A. This is my house. What view is this? This has got to be,
19 I think, from the rear of the house in Gbarnga at my farm.

13:25:04 20 Q. DP-207, quickly. Same thing, right, 207?

21 A. That is correct. This is the front of the house.

22 Q. And, finally, 208?

23 A. This is the house, yes.

24 MR GRIFFITHS: Now, Mr President, what I'm going to suggest
13:25:35 25 is this: That we break these photographs down into categories,
26 and I'm going to ask, first of all, that the photographs of the
27 Executive Mansion in Gbarnga, those being DP-191, 192, 193, 194,
28 195 and 196, all be referred to as MFI-266A, B, C, D, E, F.
29 Okay, Mr President?

1 PRESIDING JUDGE: Yes. Those photographs will be marked
2 for identification accordingly.

13:26:37 3 MR GRIFFITHS: That the five photographs of the training
4 base at Gbatala, DP-197, 198, 199, 200 and 201, all be designated
5 MFI-267A, B, C, D and E.

6 PRESIDING JUDGE: Yes, marked accordingly.

7 MR GRIFFITHS: That the photograph DP-202 of the NPP party
8 headquarters in Gbarnga be designated MFI-268.

9 PRESIDING JUDGE: Yes, that photograph is marked MFI-268.

13:27:07 10 MR GRIFFITHS: That the photograph of the administrative
11 headquarters for Bong County in Gbarnga, DP-203, be referenced
12 MFI-269.

13 PRESIDING JUDGE: Marked MFI-269.

14 MR GRIFFITHS: And then that the photographs DP-204, 205,
13:27:31 15 206, 207 and 208 of Charles Taylor's unfinished house at his farm
16 near Gbarnga be MFI-270A, B, C, D and E.

17 PRESIDING JUDGE: Yes, those photographs are marked for
18 identification accordingly.

19 MR GRIFFITHS: I note the time, Mr President. I have no
13:27:55 20 further questions on this particular topic. Would that be a
21 convenient point?

22 PRESIDING JUDGE: Yes, I think we'll break rather than
23 start a new area.

24 We will adjourn now for lunch and come back at 2.30.

13:28:13 25 [Lunch break taken at 1.27 p.m.]

26 [Upon resuming at 2.32 p.m.]

27 MR GRIFFITHS:

28 Q. After the brief respite of looking at those photographs, we
29 go back to - we go back to the procedure in which we were engaged

1 before. I'm looking at another witness now. Varmuyan Sherif.

2 Yes?

3 A. Yes.

4 Q. TF1-406 gave evidence in open session in January 2008.

14:34:39 5 Now, Mr Taylor, during the course of the Liberian civil war, on
6 how many occasions was Gbarnga occupied by ULIMO?

7 A. Once.

8 Q. What year was that?

9 A. In 1994.

14:34:59 10 Q. Can you give us a month? You were away somewhere at the
11 time, weren't you?

12 A. Yes. That's got to be late - I was at Akosombo. That's I
13 would say the last quarter of 19 - that's got to be October,
14 November - no, no, no. Around September, I would put it to,

14:35:22 15 1994. September/October.

16 Q. Right. Now, bearing that landmark date in mind, I take up
17 the witness's account at page 808, testimony of 9 January 2008,
18 line 4:

19 "Q. How long did you hold control of Gbarnga?

14:35:52 20 A. We were there for one month when we received
21 instruction from an Alhaji Kromah that we should retreat.

22 Q. And during the one month you were in control of
23 Gbarnga where were you yourself based?

24 A. In the central town of Gbarnga, the headquarters of the
14:36:16 25 NPFL."

26 Now, Mr Taylor, what was - have we seen a photograph of the
27 headquarters of the NPFL in the photographs we looked at of
28 Gbarnga today?

29 A. Yes.

1 Q. Which one was it?

2 A. That's the one they refer to as the Executive Mansion.

3 Q. Right. Okay.

4 A. Yes.

14:36:39 5 Q. "Q. And while you were based at the headquarters of the
6 NPFL did you see any kind of television satellite
7 equipment?"

8 And he said he saw a black satellite. Now, just on that
9 detail, Mr Taylor, was there such a facility at the Executive
14:36:54 10 Mansion in Gbarnga?

11 A. A black satellite? Well, what he could be describing,
12 which was there, around this time the satellite - the dishes were
13 huge parabola type dishes. There was one huge --

14 Q. So there was one there?

14:37:19 15 A. -- satellite dish. Yes.

16 Q. And what as - what were you able to access by means of that
17 dish?

18 A. We could - at that particular time we could get most of the
19 Middle Eastern stations. We could get CNN. We could get - some
14:37:46 20 of the North African stations.

21 Q. BBC?

22 A. Oh, at that time no. We could get BBC by radio. No, BBC
23 TV, we could not access it at the time.

24 Q. He goes on to say at line 20 that you were the leader of
14:38:08 25 the NPFL at the time. Okay. Now, when we go over the page to
26 page 809, he says that:

27 "A. We retreated to St Paul Bridge. That was the
28 boundary between the NPFL and the ULIMO until the final
29 peace was signed."

1 Do you agree with that, Mr Taylor?

2 A. Well, the way - the way this witness starts off with they
3 were asked to withdraw, I disagree with that part, even though
4 you didn't ask me, but I disagree. We forced ULIMO out of
14:38:52 5 Gbarnga after not one month. We forced ULIMO out of Gbarnga
6 after three months of fighting. That was ULIMO and the coalition
7 forces, along with ECOMOG, that were involved and we did push
8 them to the St Paul River Bridge. To that I say yes.

9 Q. Right. And bearing in mind earlier testimony that you've
14:39:19 10 provided, do you accept that that St Paul River Bridge formed the
11 boundary between ULIMO-controlled territory and NPFL-controlled
12 territory?

13 A. That is correct, yes.

14 Q. So you're agreeing with Mr Sheriff on that aspect, yes?

14:39:43 15 A. Yes.

16 Q. And then he is asked about the year that the final peace
17 was signed and he says 1996, the Abuja Peace Accord. You agree
18 with that, again, don't you? Line 16.

19 A. Well, no, he has got it a little wrong. The Abuja Peace
14:40:05 20 Accord is signed before 1996. But, anyway, the Abuja Peace
21 Accord brought an end to the crisis, but the year is a problem.

22 Q. Now, he is then asked this specific question:

23 "Q. During the time that you were in ULIMO fighting in
24 Liberia against the NPFL and in some instances the RUF and
14:40:25 25 LDF, what if anything did you learn about the treatment of
26 civilians by these groups?

27 A. Well, the treatment of the civilians, we didn't get any
28 good news about that because most of the places that we
29 captured, we realised that people were tied. Sometimes you

1 ask why they are executing people, they tell you that we
2 heard that they are supporters of NPFL. And that was ULIMO
3 at the time. And some other time people were taken from
4 there. If you complain you will be executed. And some
14:41:01 5 other people, people's children who were under the age of
6 13, 14 year-old girls were used as their wives. If their
7 parent complains the person will die. If you had food they
8 would tell you that, 'You civilians, you don't have blood
9 in your body, you cannot be having food and the soldier who
14:41:20 10 is carrying the gun does not have food' and then your food
11 will be taken away from you. So sometimes you have to
12 leave your food in the bush and if you have your food you
13 bring it to the town it will be taken away from you. Those
14 were the informations that we heard from them."

14:41:36 15 Mr Taylor, you accept, do you, that atrocities were
16 committed during the Liberian civil war.

17 A. Yeah, but not what - there were atrocities but as being
18 described here I have serious disagreement with what he is
19 talking about here because I have a completely different
14:42:01 20 recollection of what happened at that time.

21 Q. What's your recollection then?

22 A. Well, these were some of the things that the NPFL was
23 trying to stop and these are some of the things that caused the
24 NPFL to prevail after the elections. So the type of atrocities
14:42:25 25 that he is talking about are the things that most of the
26 foreigners that he brought - because most of the people that
27 fought in ULIMO were from Guinea that had done most of this
28 stuff.

29 Our traditional people - you know rape and different things

1 in our tradition is a terrible thing. When you hear about the
2 Poro and Sande societies, rape in our tradition is unacceptable
3 and this is why during the NPFL period I have said it over and
4 again. Any military soldier or personnel that raped a woman
14:43:01 5 during the NPFL time was tried and executed, okay. So his
6 description here came mostly from the things that these people
7 came to do. The burning of buildings and different things were
8 never the type of thing that the NPFL did, you understand me?
9 This is why when you look back at the records that we've shown
14:43:20 10 this Court during the time of the elections in Bong County and
11 other counties, look at the percentage of winning that - in some
12 counties that we had elections we won up to 95 per cent. So this
13 was not a trait of the NPFL. I disagree with him fully.

14 Q. Very well. The witness goes on to say at line 20 on that
14:43:48 15 page, Mr Taylor: "In 1995 I was appointed as the assistant
16 director for operations, SSS, Executive Mansion, Monrovia." Do
17 you agree?

18 A. Yes.

19 Q. Was it in 1995?

14:44:02 20 A. In 1995, yes.

21 Q. So he was appointed into that position prior to your
22 election as President?

23 A. That is correct. During the - I'm not sure if you need the
24 clarification on this.

14:44:16 25 Q. Yes, please. Just briefly tell us.

26 A. The Council of State, the collective presidency, all of the
27 warring parties come and we were six on the Council of State.
28 Each of the parties, Kromah is on the council, Alhaji Kromah for
29 the sake of the record. George Boley from the LPC. These names

1 are all known by the Court now. We are all on the council. The
2 SSS is there to protect the presidency. So what they did to
3 guarantee their own protection, each member of the council
4 nominated certain individuals to work.

14:44:54 5 Q. And in fact, Mr Taylor, we can deal with this quite swiftly
6 because the witness does go on to explain this.

7 A. Okay. Very well.

8 Q. When we go further down that same page, picking it up at
9 line 25, he does say, "There was a peace agreement that they
10 decided to have the representatives of all the main three key
11 warring factions"?

12 A. That is correct.

13 Q. "The NPC headed by George Boley, ULIMO headed by Alhaji
14 Kromah, NPFL headed by Charles Taylor. They decided to have a
15 government of inclusion."

16 You would agree with all of that so far, yes?

17 A. All of that is correct.

18 Q. He goes on, "When Sankawulo was the council's chairman"?

19 A. That is correct.

14:45:38 20 Q. "And all the security operations was distributed amongst
21 the various warring factions." You agree with that?

22 A. I agree with that.

23 Q. Very well. Good. Move on. Now, he goes on on that page,
24 and I just want to swiftly just confirm some of these details to

14:46:01 25 describe the ULIMO split into ULIMO-K and ULIMO-J. At line 18:
26 "ULIMO-K had all tribes but was predominantly Mandingo." Do you
27 agree?

28 A. I disagree.

29 Q. What's wrong with that?

1 A. That ULIMO-K was predominantly I would say 95 per cent
2 Mandingos.

3 Q. That's what he says, Mr Taylor?

14:46:26

4 A. No, he said all tribes and they did not have - there are 17
5 tribes in Liberia. They had predominantly Mandingos, the rest of
6 them were a few Krahn's but that's it.

7 Q. Okay. And he goes on: "ULIMO-J also had all tribes but
8 predominantly they were Krahn." Do you agree with that?

9 A. I disagree.

10 Q. What's wrong with that?

14:47:07

11 A. ULIMO-J was predominantly about 95 per cent Krahn and a few
12 per cent is Kru and Grebo. There were no Mandingo people left -
13 if a Mandingo man had been found in ULIMO-J they would have
14 killed him, there were none. And like there were no Krahn people
15 left in ULIMO-K.

16 Q. Then he goes on to describe his duties as assistant
17 director for operations. He goes:

14:47:25

18 "At that time was a factional government. You were only
19 there to seek the interest of your faction at that time. Because
20 whenever there would be a group of men who were supposed to come
21 to security section every faction would have to provide 50 people
22 and the other faction will provide 50 persons and that's how it
23 happened. Then they will have to meet the director, they discuss
24 about it and then they get the training and then they start the
25 service."

14:47:44

26 I just want to take one part of that. "You were only there
27 to seek the interest of your faction at the time", is that a fair
28 description?

29 A. Very fair. Yes, I agree with that.

1 Q. Page 813, please. Do you agree that he was assistant
2 director of operations up to 1999/2000?

3 A. Yes. But let me just make one distinction. Between 1995
4 through '97 as assistant director for SSS he did not provide any
14:48:30 5 security functions for me or for Boley. That was a title, but he
6 was responsible for Kromah, his man. Now, as of my election in
7 1997 I keep him on, now he begins to perform the general
8 functions. So there are two periods I just wanted to separate.

9 Q. So there's 1995 to '97?

14:48:54 10 A. That is correct.

11 Q. Then 1997 onwards?

12 A. That is correct.

13 Q. And do you agree the end date of '99/2000?

14 A. Well, he stretches it to '99/2000. I don't know what he is
14:49:11 15 talking about, but 1999 I would say no. Varmuyan is sick in
16 1999, so --

17 Q. Sick how?

18 A. He goes mad. So this '99/2000 that he opens up that way,
19 no. I would say most of 1998 yes, but 1999 Varmuyan goes mad.

14:49:34 20 Q. When you say goes mad, what do you mean, Mr Taylor?

21 A. Well, Varmuyan - I don't know. We call it going mad in
22 Liberia in that area. He had what you would call - how did - I
23 don't know how they would call it here - describe it in Europe -
24 but he went mad. Varmuyan walked around naked and he had to be
14:49:56 25 restrained. He lost - what we call like losing your mind, okay.
26 That's what happened to him and I had to send him out for
27 treatment.

28 Q. Where?

29 A. I sent him to Mali.

1 Q. To whom?

2 A. Well, there was a man - there was an area in Mali that we
3 understood could cure people and apparently they did. There's an
4 area called Djenne and we sent him to Djenne. Djenne is an area
14:50:24 5 where there are very senior, senior Islamic scholars and Imams
6 and it's a holy place and he stayed there for some time and was
7 cured.

8 Q. After that what happened to him?

9 A. He came back and we transferred him to the bureau of
14:50:49 10 immigration.

11 Q. Which is what he says at line 17: "I was transferred from
12 the SSS to immigration as the deputy chief of security." You
13 agree with that?

14 A. I agree.

14:50:59 15 Q. And he says that he continued to work at immigration up to
16 2003. Do you agree?

17 A. I agree.

18 Q. Good. He also said that you appointed him as deputy chief
19 of security army division, line 27 to 28?

14:51:17 20 A. Yeah. That's during the war now. He begins to fight,
21 yeah.

22 Q. Now that we've located him let's go on to deal with some of
23 the specific allegations he made. Now, you will recall,
24 Mr Taylor, he spoke, amongst other things, of recovering arms
14:51:44 25 hidden by ULIMO in Lofa County. You remember that?

26 A. Yes.

27 Q. Let's go to page 821. Pick it up at line 5:

28 "They finally showed me where the guns and the ammunition
29 were hidden.

1 Q. When you went to this area where the guns were hidden
2 what quantity of guns did you find there?

3 A. Together there were four loads of pick-up but I didn't
4 bring all in one go.

14:52:20 5 Q. What did you find there?

6 A. I found AK-47, the ammunition, the RPG, that's the name
7 that we have for an RPG, the bomb, mortar, 60."

8 He goes on to give some descriptions and he says:

9 "Q. What was the condition of these weapons and the
14:52:38 10 ammunition when you found them in Voijnama district?

11 A. The condition was in better condition because they had
12 been greased and placed in a big hole and put into a
13 plastic. Even though mud was on it when it got wet they
14 only need clean up but they were all in functioning
14:52:58 15 condition.

16 Q. I believe you said that you ended up with four loads of
17 arms and ammunition but you only took one. Was that on
18 this trip back to Charles Taylor that you took one load?

19 A. I carried one and I went back also. When I was going
14:53:12 20 that time now Joe Montgomery - I had brought them to
21 Mr Taylor at his residence. He came outside, he saw them,
22 he was happy with me. He also gave me - he gave
23 instructions to the deputy ADC. He was the Gambian Musa."

24 Pause there. Mr Taylor, what he is describing there is
14:53:40 25 arms and ammunition being dug up, four pick-up loads worth of
26 arms, yes, and one of those loads is taken to you at your
27 residence. What do you know about this?

28 A. Well, yes. There is some - some truth, but let's get the
29 full picture. Varmuyan Sheriff did not find any weapons. He

1 didn't find any weapons. What happened, after my election we
2 chose to keep some of these individuals on board, including
3 Sheriff in the position of assistant director of operations.
4 There are a lot of our people that do not trust Sheriff.

14:54:40 5 "Mr President, this man" - Sheriff was one of the most senior
6 generals of ULIMO. I think either deputy chief of staff of
7 ULIMO. "This man, who is an enemy, who tried to kill you, we
8 can't keep him in this position." I said, "No, for
9 reconciliation let him stay" and this is when we decided that we
14:55:06 10 would put him in charge of the convoy.

11 Now, I remember this vividly as it happened today. Sheriff,
12 in trying to convince us, me and the rest of the NPFL now NPP
13 individuals that we're sceptical of him, said that during the
14 disarmament there were some weapons that ULIMO had hidden and he
14:55:36 15 was aware of some of these weapons. So this matter that he
16 described how they were greased and wrapped in plastic, they did
17 it. Varmuyan. They knew what was going on. So we said well -
18 and he wanting to demonstrate his loyalty will go and bring some
19 of these weapons that he knew. So we said fine.

14:55:57 20 He went and he brought some weapons. I did come out and I
21 had asked him to bring a sample of some of the weapons that he
22 brought because I wanted to see the condition. I did come out
23 and look at some of the weapons at White Flower.

24 Q. At which White Flower, Mr Taylor?

14:56:15 25 A. At the mansion. He brought them to me.

26 Q. Which mansion?

27 A. At the Executive Mansion in Monrovia.

28 Q. Right.

29 A. And I came out and I looked at the weapons and I said that

1 was good. I am not sure of the quantity that he described, four
2 pick-ups. I didn't look at the - I only looked at the samples.
3 But it is true that he brought weapons. But this is not weapons
4 that he found. This is weapons that he said, in demonstrating
14:56:43 5 that he was loyal to the government, he will bring what he knew
6 of and he did.

7 Q. And so he did do that?

8 A. He did do that.

9 Q. Now, how many times did he do that, Mr Taylor?

14:57:01 10 A. To the best of my knowledge, once. Varmuyan brought
11 weapons once.

12 Q. Because he does go on to say on this same page, line 19:

13 "Q. You indicated that you took a second trip to Lofa
14 County and what happened as a result of that trip?

14:57:18 15 A. This time when I was going on the second trip Joseph
16 Montgomery gave one of his senior bodyguards to go along
17 with me. So during my second trip these things we brought
18 were taken to Joseph Montgomery's home, residence, and that
19 he had the instruction that was everything was to be
14:57:39 20 cleaned up and handed over to the Liberian security."

21 Do you know about that incident?

22 A. No. And if any weapons had come, they would not have gone
23 to Joseph Montgomery's house, no. I don't know about this. No.

24 Q. He goes on to describe - and I'm jumping to page 826. He
14:58:08 25 says that you were - he was called into your office. Line 9:

26 "A. Mr Taylor called me at his - in his fourth floor
27 office at the Executive Mansion in the presence of Musa
28 Cisse, Joe Tuah, Benjamin Yeaten, Joseph Montgomery, Momo
29 Dgiba, when he gave the instruction that, 'Sherif, will you

1 be able to go to the territory of the RUF and get Sam
2 Bockarie for me? "

3 Was there such a meeting?

4 A. No, there was no such meeting. And here we are, I do not
14:58:56 5 know what time again, maybe we'll get it, that he is talking
6 about, but there was no such meeting. How - all of the people
7 that he is talking about here are real, and all of these people
8 are very senior and close trusted people to me, and I don't ask
9 them? I will ask him. But maybe it may be interesting to see
14:59:22 10 what time he is talking about.

11 Q. Well, he does describe this as taking place in late '98,
12 early '99.

13 A. Well, then we have a problem here. Then there are two
14 problems. Number one, this never happened. But don't let's
14:59:39 15 forget, Hassan Bility came before this Court and said in 1997,
16 when he was arrested at NPP headquarters, Sam Bockarie was there.
17 I didn't need them - if this is true, I didn't need Varmuyan
18 Sheriff to do anything because I should have already known - I
19 should have already known Sam Bockarie. So why would I need him
15:00:04 20 for? Why on earth would I, Charles Taylor, a man that just been
21 trying to kill me over years of fighting on an important mission
22 to Sierra Leone would send an enemy? No, it never happened. But
23 then if he is telling the truth, then Hassan Bility must account
24 for where he saw this Sam Bockarie at NPP headquarters after the
15:00:27 25 election in 1997.

26 Q. Well, let me put another scenario then to you, Mr Taylor,
27 so you can deal with it now in case it provides the basis for an
28 argument at a later stage. You do recall, do you not, a letter
29 you received from your ambassador in Guinea in August 1998?

1 A. That is correct.

2 Q. And in that letter your ambassador, Tiagen Wantee,
3 mentioned a connection between Varmuyan Sherif and the RUF?

4 A. That is correct.

15:01:10 5 Q. And we know from the juxtaposition of the two forces that
6 it was geographically possible for such a connection to have been
7 fostered when ULIMO occupied in particular Lofa County in
8 Liberia, yes?

9 A. Definitely, yes.

15:01:28 10 Q. Now, Mr Taylor, bearing in mind the contents of that
11 letter, wouldn't it make sense for you to select the very man
12 mentioned in that letter to go and make contact with Bockarie?
13 You follow?

14 A. I follow. No, I wouldn't. In fact, when that letter
15:01:47 15 finally surfaced and we saw Varmuyan, oh, oh, eyes open. "But,
16 chief, we told you about this man." Because up until that time
17 Varmuyan had not said to anybody that he knew Sam Bockarie. So
18 when the letter came in, people were saying, "But wait a minute,
19 you're telling me these people have been working with the RUF and
15:02:07 20 did not tell anybody?" So people's eyes were open. This is why
21 we deliberately sent someone other than him to the border,
22 General Menkarzon, to go and get Sam Bockarie, because he,
23 Varmuyan, apparently, they had been working and selling and doing
24 business with the RUF even before my elections as President.

15:02:29 25 Q. So, in one word, Mr Taylor, what do you say about this
26 suggestion by Sherif that you summoned him and gave him this
27 instruction?

28 A. It's a lie.

29 Q. Very well. He goes on that pursuant to that instruction he

1 makes a trip to Sierra Leone and arrives in Buedu. Page 834,
2 line 5:

3 "A. When we get at Buedu, entering we met a checkpoint and
4 they told us - they asked us what our mission and we said
15:03:02 5 we met Sam Bockarie at Kailahun and his bodyguards told us
6 to follow him and they said, 'No, we did not receive any
7 instruction so you have to wait here and we will go and
8 inform him.' We waited. In fact, they disarmed us because
9 we had our arms with us. They disarmed us. When they got
15:03:23 10 to him -

11 I explained that to them I explained, that I was coming
12 from Liberia and that I was working with the Executive
13 Mansion as an SSS officer and I only came to see Sam
14 Bockarie. I didn't explain any further details to them.
15:03:43 15 But then they told me that there wasn't any instruction
16 given to them for that, so we have to wait until they
17 inform him. Then they had to take all of our arms away
18 from us. Then when they came back they said, 'We are
19 sorry, Sam Bockarie is annoyed with me that you guys are
15:04:03 20 the President bodyguards, why should I take your weapons
21 from you.' Then he said, 'I should return your weapons to
22 you before I reach him.'"

23 So they returned their weapons. And he goes on, that they
24 went to Sam Bockarie's house. Page 835:

15:04:24 25 "Q. And what happened when you arrived at Sam Bockarie's
26 house?

27 A. When I got there, he sent for me to enter to meet him
28 in his room. He asked me about my mission, what my mission
29 was and I told him that I was sent by Mr Taylor, the

1 President of the Republic of Liberia at that time, and
2 that I should take you along with me to go and see him. He
3 asked for my name and I told him my name is Varmuyan
4 Sherif. He said, 'Are you not from ULIMO?' I said yes.
15:04:59 5 He said, 'Oh, I don't trust you. I don't trust you.' He
6 said, 'Why didn't Mr Taylor not send some other person like
7 Joseph Montgomery or any other NPFL man except you ULIMO
8 men who have been fighting against me?'
9 Then I explained some reasons to him. I told him the
15:05:20 10 reason is in Lofa County area, now it's controlled by
11 ULIMO-K and now the fighters there did not disarm properly,
12 some of them had weapons. If Mr Taylor used any of the
13 NPFL guys to come for you maybe they would have ambushed
14 that person, you can't tell. But knowing me to be one of
15:05:44 15 the most senior commanders in the ULIMO-K I can pass
16 through them and I can take anybody through them anywhere
17 and there wouldn't be an any problem. Maybe, I said, that
18 will be the reason why Mr Taylor sent me to collect you."
19 Now, pause there, Mr Taylor. That's sound quite plausible,
15:06:09 20 doesn't it?
21 A. Your Honours, you know, this level of deception - let me
22 remind this Court. We are told here in this Court that Sam
23 Bockarie on one occasion when times were rough in Sierra Leone
24 came along with some men to ULIMO in Foya. We are also told that
15:06:42 25 he was arrested because they were concerned I did not trust him.
26 After a couple of days of discussions they made peace and the
27 relationship between ULIMO and the RUF started. By this time the
28 borders are still - in that entire region is still in ULIMO's
29 care.

1 So for this man to say that Sam Bockarie now tells - "Oh,
2 you are from ULIMO. I don't trust you," but let's don't forget,
3 they have been working with ULIMO for years, base on Prosecution
4 witnesses after witnesses here, that they go there, they meet
15:07:25 5 with them, and they smoke the peace pipe and they begin this
6 trade of weapons for some time. So now Sam Bockarie is at a
7 point where he doesn't trust them, basically a lie. He is lying.

8 Secondly, here is this individual here now who by this
9 time, if the account is right, I've mentioned this before, all of
15:07:55 10 a sudden why would Eddie Kanneh tell the ambassador of Liberia in
11 Conakry that the contact that they have already in Monrovia is
12 Varmuyan Sherif, that Varmuyan Sherif would enter RUF territory
13 and he is molested? Nonsense. A basic lie. You understand me?
14 That's what makes it so, you know, deceitful and you can see the

15:08:24 15 deception. So here is a man who has been dealing with these
16 people, the most senior general in ULIMO who has been selling
17 weapons to them before ULIMO gives up Lofa. Here is a man that a
18 senior RUF man goes to Guinea and says, "We want to see the
19 President now. We have this information and we have this
15:08:46 20 contact," and he is supposed to go back and he is molested? He
21 is lying.

22 Thirdly, this whole issue about Joseph Montgomery and what
23 not is also basically a lie. The very Montgomery he is talking
24 about who is a paramilitary, very good combatant, if anybody
15:09:11 25 wanted Sam Bockarie at that time, at least I would have sent some
26 NPFL people along with Varmuyan. Why would Varmuyan Sherif be
27 sent on a mission by me to go and get Sam Bockarie and there
28 would not be one NPFL man that will go along with him? And don't
29 let's forget, at the time we are talking, we're talking about

1 1998, 1999, the NPFL is no longer there, but I'm President and we
2 have security personnel all the way up to the border. He is
3 lying through his teeth. A basic lie.

15:10:01 4 Q. He says that having met up with Bockarie, Bockarie being
5 sceptical and he providing that explanation, he then says that
6 Bockarie told him - and I am jumping to page 836, line 6:

7 "Bockarie said he was going to call Monrovia to find out.
8 So the next day - we should sleep until the next day while I
9 explained to him, he didn't trust nothing that I explained to
15:10:26 10 him. So we had to sleep. So he would call tomorrow to the
11 Executive Mansion to find out. So I began getting worried, how
12 he was going to get in contact with Monrovia. And Monrovia, I
13 don't know RUF had any communication with the Executive Mansion.
14 From the time I had been there up to election of Mr Taylor coming
15:10:54 15 there I did not know that link. So we were worried throughout
16 the night until the following day."

17 He goes on to say:

18 "The next day he said we should walk to go to the radio
19 room. The radio room where they had their communication area.
15:11:12 20 And we walked just about 20 yards from the house. We walked up
21 there and he told the radio operator to contact Monrovia, the
22 Executive Mansion. So I was still worried because this thing was
23 discussed among a few people in the Executive Mansion."

24 He goes on to describe, and we can move swiftly, a call
15:11:35 25 being made and that call being received by a radio operator
26 located on the fifth floor of the Executive Mansion in Monrovia.
27 Taking it up from there: The radio operator was asked to get
28 Joseph Montgomery. Mr Sheriff continues in this way, Mr Taylor,
29 on page 839 at line 11: "Joseph Montgomery came on the radio

1 and said, 'This is 52.'" Was that Mr Montgomery's code?

2 A. Yes.

3 Q. "And that is our secure code and I know that he is 52. I
4 am 56. And I recognised his voice."

15:12:22 5 And then he goes on, he was asked this:

6 "Q. You indicated that the communication to the Executive
7 Mansion went to the fifth floor of the Executive Mansion.
8 How did you know that?

9 A. That is why when I came back before I went to the fifth
10 floor to find out that a radio at the fifth floor - so when
11 I came back before I got to know the entire detail that
12 there was a radio, they had brought it from Gbarnga and
13 they stored it at the fifth floor and that's where they do
14 their communication is different from the Executive Mansion
15 radio. I did not know about it when I was in the
16 Executive Mansion until when I got back from the trip and I
17 visited the area that I got to know about it."

18 A number of issues there that I want you to deal with,
19 Mr Taylor. Firstly, was there this radio on the fifth floor of
15:13:26 20 the Executive Mansion which was used to keep in touch with the
21 RUF?

22 A. No.

23 Q. A radio which had been brought from Gbarnga?

24 A. No. This liar knows - he had been in the mansion from
15:13:43 25 1995. The fifth floor of the Executive Mansion, your Honours,
26 contained the communication section of the Secret Service. All
27 of the - whether it is - whatever sophisticated equipment,
28 whether it is listening, whether it is monitoring, whether it is
29 telephone, all of the communication gear of the Secret Service

1 are located on the fifth floor. This Varmuyan Sheriff working as
2 assistant director for operation from 1995, your Honour, is lying
3 if he says he did not know that the communication quarters of the
4 Secret Service that he worked for as assistant director was not
15:14:31 5 on fifth floor. So he is lying.

6 What he is trying to do - I know what he is trying to do -
7 is to say that there was supposed to be a secret radio on the
8 fifth floor. That's why I'm saying he's lying, because that
9 fifth floor contained all communication. There was no specific
15:14:48 10 radio for contacting no RUF and he knows that.

11 Q. He is saying in terms that this was a different
12 communication system from the normal Executive Mansion radio.
13 That's what he is saying, Mr Taylor?

14 A. But that would be --

15:15:05 15 Q. It's a distinct unit?

16 A. Nonsense. Total lie. What kind of - I mean, in fact, the
17 SSBs that were being used during the war, the Secret Service had
18 more sophisticated radios that if anybody wanted to use would
19 use. That is a total lie. Total lie.

15:15:24 20 Q. I want you to look at another aspect of this account,
21 Mr Taylor, and it's this: Note, Mr Sheriff's account is he
22 arrives, Bockarie is suspicious about him and consequently, in
23 order to verify his credentials, Bockarie calls this secret radio
24 located on the fifth floor of the Executive Mansion. Yes,
15:15:51 25 Mr Taylor?

26 A. Yes.

27 Q. Consequently, it follows that prior to Mr Sheriff being
28 dispatched to Sierra Leone, you had the capacity to communicate
29 with the RUF. So help us, why hadn't you informed Mr Bockarie

1 that you were sending Varmuyan Sheriff to see him?

2 A. Well, that's the very crux of the lie, that if anybody -

3 except we are stupid. If anybody - if the same radio that

4 Varmuyan Sheriff could have called - that Sam Bockarie was

15:16:32 5 supposed to have called the mansion, wasn't it logical for the

6 Executive Mansion to get on the radio and call Bockarie before

7 Sheriff left and say, "Sam, there is a gentleman called Varmuyan

8 Sheriff that we are sending over to get you." Wouldn't it make

9 sense? Maybe he has not recovered from his watchamacallit, maybe

15:16:56 10 he was getting to that point before he went mad. Because it

11 doesn't make any sense that no one would inform these people

12 until he gets there, he is embarrassed, he is heckled or whatever

13 and then a call is finally made. Does it make any sense? I

14 don't operate that way.

15:17:15 15 Q. Now, you will recall, Mr Taylor - and again because of our

16 familiarity with this evidence we can move quite swiftly. You

17 recall that after that initial doubt on the part of Bockarie,

18 Sheriff's account was that they left and en route back to Monrovia

19 they stopped in Voinjama. Yes?

15:17:39 20 A. Yes.

21 Q. And he goes on, page 845, line 5:

22 "Voinjama is my home where I originated from. That is the

23 reason why I said at our house. We have a house there that is

24 called Sheriff Quarter. When we got there Bockarie said he wanted

15:18:00 25 to take his bath and to get a haircut, so he had a haircut, he

26 had a bath, he took off his jacket to enter the bathroom. Three

27 of us together: He, myself and one of my senior officers. At

28 the back of the house" - line 20 - "he took his jacket off to

29 hang it. Whilst in the process of taking his jacket off, I saw a

1 mayonnaise bottle that he took out of his jacket and we realised
2 there were diamonds in it in his pocket. One of my senior
3 officers who saw these diamonds said, 'Oh, we can get rid of this
4 man and take these diamonds and then we will cross over to a
15:18:40 5 different country and then go away.' Then I said to him, 'No, if
6 you do that we will be putting ourselves into problems and we
7 have our families in Monrovia, so that is not necessary.'"

8 Now, you recall, Mr Taylor, that those diamonds
9 subsequently, we're led to believe, ended up in your pocket, yes?

15:19:05 10 A. Yes.

11 Q. Now help me, Mr Taylor. On this account given by
12 Mr Sheriff, he is going to create or initiate this link between
13 Bockarie and you, yes?

14 A. Yes.

15:19:26 15 Q. You've sent him to fetch Bockarie to meet him, yes?

16 A. Yes.

17 Q. Logically, therefore, on his account you had not met
18 Bockarie before, yes?

19 A. Yes.

15:19:37 20 Q. Now help me, Mr Taylor. Had you said to him, Mr Sheriff
21 that is, "When you meet Mr Bockarie please tell him to bring a
22 gift of diamonds with him, otherwise perhaps I'm not going to see
23 him." Did you?

24 A. No, I did not.

15:19:59 25 Q. Can you explain why it is that Bockarie, uninvited on this
26 account, is bringing a mayonnaise jar of diamonds to you, a man
27 you had never met before, on Sheriff's account?

28 A. I have no idea because it just didn't happen. Even on
29 Sheriff's account late '98, '99 if this is the account don't let's

1 forget by other accounts I have already received Foday Sankoh - I
2 mean Sam Bockarie on several occasions and I've already received
3 diamonds before. This is utterly wrong.

15:20:44 4 And in fact, Voinjama. Sam Bockarie comes from across the
5 border - if his accounts are right, from across the border into
6 Voinjama and he has to take a bath. He is dirty because he
7 didn't take a bath before coming and from Voinjama to the border
8 we're talking about - the road is good, we're talking about three
9 hours, he gets over there and he has to take a bath? This man is
15:21:04 10 just lying. Total, totally lying.

11 Q. He tells us, Mr Taylor, page 848, that given the success of
12 his mission you, at White Flower, line 26, gave him money and
13 told him you were happy with him. Yes?

14 A. Uh-huh.

15:21:37 15 Q. Is that true?

16 A. That is not true.

17 Q. And he also went on that you weren't the only person happy
18 with him; Sam Bockarie was also happy with him as well. Page
19 849. He says that after this meeting with you, he drove in Sam
15:22:13 20 Bockarie's vehicle:

21 "I was driving in Sam Bockarie's vehicle" - line 15 -
22 "when he was so happy with me he told me, 'Thanks very much,
23 because you have been the very first person to make things
24 possible for me to see Mr Taylor.' He said, 'I knew Mr Taylor
15:22:35 25 during the time when RUF was getting ready for the mission. At
26 that time I was just a little boy and Foday Sankoh was the leader
27 at that time, but all of the time we have just been communicating
28 through radio. For me to sit down with Mr Taylor face-to-face
29 and talk to see him and sit and talk, you have been the cause

1 that has happened for me and I will never forget about you. You
2 will always be my friend and any time I come down to Monrovia I
3 will reach to you. I have money. He gave me money. I have
4 satellite. He gave me satellite phone. Any time I want to
15:23:19 5 communicate with him, I can communicate with him. In any part of
6 the world I want to communicate, I will communicate with that
7 person.' "

8 Now, Mr Taylor, let's look at that. First of all, perhaps
9 I ought to continue a little further because he clarifies who is
15:23:56 10 the "he" he is talking about. Page 850:

11 "Q. You said that Sam Bockarie told you that he gave Sam
12 Bockarie money and he gave Sam Bockarie a satellite phone.

13 Did he tell you who he was referring to when he said 'he'?

14 A. He was referring to former President Taylor."

15:24:16 15 So that's the full passage. Now, Mr Taylor, first of all,
16 on that first trip that you accept Bockarie made to Monrovia in
17 the autumn of 1998, did you give him money on that occasion?

18 A. The first occasion, no.

19 Q. Did you give him a satellite phone on that first occasion?

15:24:45 20 A. No.

21 Q. When did you give him the satellite phone?

22 A. On the second visit.

23 Q. And on that second visit did you also give him money?

24 A. No, I didn't give him money.

15:25:01 25 Q. Was it the case that it was Sheriff you sent for him on that
26 second occasion?

27 A. No, no, no, no, no, no. Never for Sheriff. I would never
28 have sent Varmuyan Sheriff anywhere. And you know, I have to keep
29 reminding because this is all about my life, these lies are just

1 terrible. If Varmuyan Sheriff is right, don't let's forget, I
2 should have met Sam Bockarie. So Sam Bockarie cannot be saying
3 here to Varmuyan Sheriff, "oh, for me to sit down with Mr Taylor
4 face-to-face, thank you." Don't let's forget, Hassan Bility said
15:25:48 5 that I had already met this man at my headquarters in 1997 when
6 he was supposed to have been arrested and brought there through
7 the action of Joe Tait as police director. So I've already met
8 him. So how can Sam Bockarie be saying now that for you to bring
9 me to meet him face-to-face? So who is right now? Is Hassan
15:26:16 10 Bility right when he says that I have already encountered Sam
11 Bockarie at the NPP headquarters in 1997? Or this other liar who
12 is saying here that he is the one that goes to bring him to
13 Liberia when he is not the one?

14 Q. Now, Mr Taylor, let us not overlook a subtle point
15:26:39 15 contained in that passage. Note: "He said," line 18, "He said,"
16 that being Bockarie, "I knew Mr Taylor during the time when RUF
17 was getting ready for the mission. At that time I was just a
18 little boy and Foday Sankoh was the leader at the time." Do you
19 get it?

15:27:05 20 A. Yes.

21 Q. What he is saying is, when he's a little boy, before the
22 invasion of Sierra Leone --

23 A. Bockarie knows me.

24 Q. -- he knows you.

15:27:17 25 A. A blatant lie.

26 Q. Right. So that attaches you with knowledge of planning of
27 the invasion before it took place, again, contrary to what you
28 have told this Court. Do you follow?

29 A. I follow.

1 Q. Did you know Bockarie from back then?

2 A. Never knew any person called Sam Bockarie. Never. No.

3 Q. And the second subtle point that's there is, "And all of
4 the time we had just been communicating through radio." Again,

15:27:58 5 deal with that specifically. You understand what's being said?

6 A. Well, it depends on what he is talking about here. Maybe
7 he is talking about all that time, which would mean that during
8 the time he is in Sierra Leone they had been in contact. There
9 had been no radio contact with Sam Bockarie.

15:28:16 10 In fact, all of the months that Foday Sankoh came to
11 Gbarnga, he never brought Sam Bockarie. And besides, Sam
12 Bockarie does not begin to do anything serious with the RUF until
13 about when? 1996/1997, when Foday Sankoh is arrested. As far as
14 radio communication with Liberia, Sam Bockarie does not start any
15:28:50 15 communication with my government before 1998, last quarter,
16 October/November.

17 Q. Now, he goes on to describe, Mr Taylor, taking Bockarie
18 back to the Kailahun/Liberian border and then returning to
19 Monrovia.

15:29:22 20 MR GRIFFITHS: But before I pick up the thread of his
21 account, can I pause to mention a spelling, please, Mr President?

22 PRESIDING JUDGE: Yes.

23 MR GRIFFITHS: Djenne Mali, D-J-E-N-N-E, also spelt
24 J-E-N-N-E.

15:29:45 25 PRESIDING JUDGE: Thank you.

26 MR GRIFFITHS: Not at all:

27 Q. Now, at page 851, the account continues in this way, line
28 19:

29 "Q. And now you said that you came back to Monrovia after

1 taking Sam Bockarie to the Sierra Leone border. Did you
2 have another meeting with Mr Taylor after you came back
3 from that mission?

4 A. Yes.

15:30:11 5 Q. When?

6 A. He called me back and instructed me that whatever arms
7 and ammunition that I am bringing to Monrovia, I shouldn't
8 bring them to Monrovia again. I should take them and turn
9 everything over to Sam Bockarie that I had. At that time I
10 had only the last consignment, that is the last load, one
11 load of pickup, the last consignment that I had in hand.

15:30:31

12 Q. What else were you instructed to do?

13 A. He also said I should not speak to the former fighters
14 that are in Lofa. Everybody should be free. I should go
15 and open a corridor and nobody should arm any RUF man

15:31:04

16 whenever they do come to Liberia, or any of the former
17 fighters who go to Sierra Leone to be armed. All the areas
18 should be free. Those who have their arms they can take
19 their arms if they want to go across Sierra Leone to buy
20 and they were giving some money to Sam Bockarie and Sam
21 Bockarie will be buying arms and ammunition on their own.

15:31:27

22 Sometimes some of the arms were brought to Monrovia, not
23 everything. They may be having some arms there and Sam
24 Bockarie will send whoever he wants to send, whoever had
25 the arms and ammunition, to travel through Lofa area to buy
26 and the territory should be free to" - I guess that should
27 be everyone.

15:31:48

28 Then he is asked this question, line 23:

29 "Q. So, Mr Witness, Charles Taylor told you he wanted you

1 to take action to have an open border so that people in
2 Lofa County would feel free to provide arms and ammunition
3 to the RUF?

4 A. Yes."

15:32:25 5 There's two things there I want you to address your
6 attention to, Mr Taylor. Firstly this, because there are two
7 aspects to this answer: Did you tell Sherif - no, let me start
8 earlier.

9 You recall the testimony of this witness is to this effect:
15:32:47 10 That he had been recovering arms hidden by ULIMO in Lofa and
11 taking them to Monrovia. You recall that?

12 A. Yes.

13 Q. Now, bearing that in mind, the witness is now suggesting
14 that you told him, after Sam Bockarie was brought to Monrovia,
15:33:07 15 that in future he should no longer bring such arms back to
16 Monrovia but should take them to the RUF. Did you tell him to do
17 that?

18 A. Never did, no.

19 Q. Now, the second aspect is this: He is saying that you, in
15:33:27 20 effect, ordered a free zone in Lofa so that a trade could take
21 place over the border in arms and ammunition. Did you?

22 A. No, I did not. And Sherif is a lucky man because if I had
23 known that they were still - because at the beginning of 199 -
24 right after my election, that's when Sherif, in trying to show
15:33:57 25 his loyalty, talks about these arms. Quite frankly, Sherif says
26 he is from Voinjama. I'm not sure if he is from Voinjama, but
27 these boys, that's their home. And here we are in late 1998,
28 Sherif is still selling arms. But this Court has all the
29 evidence of RUF people that have said here that they came across

1 the border several times in Foya, Kolahun and Voinjama buying
2 arms. How would I as President of Liberia tell somebody, when my
3 security forces in Monrovia don't have arms, I will tell
4 somebody, "This is a free zone. You all sell whatever you have"?
15:34:39 5 When I am looking for arms to even arm the police that don't have
6 arms. How much sense does - these crooked boys are over there.
7 They are the ULIMO people that hid weapons in that particular
8 region and were doing their own thing in and out of this country
9 of Liberia without my knowledge.

15:35:02 10 If I had caught Sheriff, then he would have known how
11 serious a person I can be. I never knew these boys were over
12 there selling arms across the border to ULIMO.

13 Q. Well, Mr Taylor, let me interrupt you and let's break this
14 down, because the suggestion made by the witness assumes that you
15:35:27 15 had knowledge that arms and ammunition were available to people
16 living in Lofa for such a trade to go on. Do you follow?

17 A. Yeah.

18 Q. Now, help me: Were you aware that there were such arms and
19 ammunition available in Lofa after disarmament in order to make
15:35:51 20 such a trade possible?

21 A. No. That's the whole point I'm making. No. When we
22 received information, right after my election, that ULIMO had
23 hidden some arms, we then called Sheriff, who is more senior in
24 there, and say, "Sheriff, what can you do about this?" He said,
15:36:11 25 "Look, I want to prove I'm loyal to this government. I will go
26 up, and whatever I can find, I will bring." That's in 1997,
27 we're talking about August. What sense would it make if I as
28 President knowing that these people still have hidden arms and I
29 have security personnel running around in Monrovia without

1 weapons to defend themselves against armed robbers and different
2 things in the city? Does it make sense? No. Not at all. I did
3 not know that these people were still hiding arms in that Lofa
4 and selling. No, I didn't know.

15:36:49 5 Q. Now, he continues in this way, Mr Taylor:

6 "Q. So, what did you do after this meeting?"

7 That is the meeting with you. Line 28, page 852:

8 "A. When I went back to Lofa, that was in Voinjama and
9 Kolahun Foya, I met all the former fighters there and I let

15:37:12 10 them all understand that if any of them had arms and
11 ammunition they want to go and do business in the RUF

12 territories you are free, and also the RUF should have free
13 movement to Foya, to Kolahun, to Voinjama, wherever they
14 want to go. So, nowhere should be seen to be seen as your

15:37:36 15 own territory either on the Sierra Leone side, or the
16 Liberian side. Everybody was now a free man. RUF had
17 their rights in here and also you have your own right into
18 RUF territory."

19 Now, Mr Taylor, when reference is made at line 28 on page
15:37:57 20 852, "I met all the former fighters," what former fighters would
21 be in Lofa, in Voinjama and Kolahun?

22 A. All ULIMO-K that were under his command. All ULIMO-K.

23 Q. Now, help me. At this time in late 1998, this is when the
24 witness is talking about, what control did you have over these
15:38:27 25 former ULIMO combatants?

26 A. Well, I'm President of Liberia, but in terms of actual - of
27 actual control, what, we're talking about one year into a
28 seven-year civil war. It's people like Varmuyan and them that
29 still really, really have the command responsibility and, really,

1 control of these people. We are still trying to mend fence and,
2 you know, people are still - all of these people are still
3 entrenched in their positions from the war. They are still
4 there. That's why Varmuyan can go over there and speak to them
15:39:04 5 because these are the men that he commanded and still in control
6 of.

7 Q. Now, I asked for this reason, you see, Mr Taylor: So that
8 being so, Varmuyan Sheriff was precisely the person you needed to
9 give this mission to, wasn't he?

15:39:22 10 A. No. No. No. In terms of - I'm not saying that that
11 particular region was a region that nobody could enter. There
12 was not war going on. But in terms of ULIMO, they still saw
13 themselves - don't forget, after the election, a portion of these
14 people returned to Sierra Leone. ULIMO-K and ULIMO-J returned to
15:39:49 15 Sierra Leone. Some of them are recruited as Kamajors by ECOMOG.
16 A lot of these boys run away and go back. Some of their families
17 stay on the Liberian side.

18 So what we have, in terms of their arms and the secret that
19 is still amongst them, we have not penetrated that secret yet.

15:40:08 20 It is someone like Varmuyan who is a former general that has that
21 type of influence. There are other security personnel that are
22 moving in and out, but in terms of their inner circle - listen,
23 let's be very - the Mandingos are very, very close - a very close
24 knit people. There is no way that anybody could have infiltrated
15:40:34 25 those people. This is why a lot of the people that were
26 Mandingos and commanders, we kept them, because to infiltrate
27 them - the Mandingos are very, very secretive and a very close
28 knit people.

29 Q. But, Mr Taylor, that's the very point I'm making. In order

1 to crack the Mandingo group, these former ULIMO-K fighters, who
2 better for you to select than their former commander, Varmuyan
3 Sherif? Do you get it?

4 A. But to go --

15:41:01 5 Q. So you needed a Varmuyan Sherif, based on this account, to
6 crack the Mandingos, didn't you?

7 A. No, but your question was to get Bockarie and that's why
8 I'm saying no.

9 Q. No, no, no. But now we've got to the stage where we're
15:41:16 10 talking about free trade in arms and ammunition over the border
11 and you want that to flourish, so you need someone to go and
12 speak to the former ULIMO-K combatants and the point I'm making
13 is Varmuyan's your man, isn't he?

14 A. No. According to this that would be very cynical. No, I
15:41:36 15 mean because I would not accept a free trade when I need weapons.
16 So according to his thinking, okay, he will be the man to go in
17 an area. But when you look at it in the true picture, there is
18 no decision on my part or my government to sell arms to Sierra
19 Leone when I don't have arms, so it would be silly for me to say,
15:41:57 20 "Well, you go in and you arrange for the trade" when I need arms
21 myself. I mean, so what he is trying to explain here is he goes
22 over there and if he is doing this, then he's a very lucky man.

23 Q. Mr Taylor, there's something else I want to ask you about
24 that and it's this: Evidence we've heard, some of which we
15:42:27 25 looked at yesterday, suggested that you were sending consignments
26 of arms and ammunition to Sierra Leone just after the ECOMOG
27 intervention in March/April 1998. Do you recall that?

28 A. February, yes. February of 1998.

29 Q. And you remember the allegation that you had sent

1 consignments of arms then?

2 A. Yes.

3 Q. And that you had been sending consignments of arms
4 frequently across that border during that period. Yes?

15:42:59 5 A. Yes.

6 Q. Now help me. Why did you have this sudden change of
7 policy, according to Varmuyan Sherif, in late 1998 and suddenly
8 decide to declare a free trade zone? Why? Rather than hold the
9 monopoly yourself, why?

15:43:17 10 A. I guess maybe I'm supposed to be such crazy whatever.

11 There is no such thing. That's why there is no - can you imagine
12 a free trading zone of arms that I'm supposed to tell him now -
13 because there is no such thing, that's why. There's no such
14 thing. I've got policemen dying on the streets of Monrovia for

15:43:41 15 want of arms and I'm supposed to know that arms are in Lofa and
16 then say, "You guys are free to sell it across the border"?

17 Total nonsense. I would have - even if the government had to put
18 in a policy to buy the arms we would have done it. We would have
19 bought the arms from the combatants and said, "Bring these to
15:43:59 20 protect the citizens."

21 Q. The witness goes on in that same vein to describe how -
22 remember he spoke about recovering four pick-up loads of arms and
23 ammunition, Mr Taylor?

24 A. Yes.

15:44:25 25 Q. He says that three of those had gone to Monrovia. The last
26 one, page 853, line 12:

27 "The last one I was instructed to take to Sam Bockarie.
28 The first one, the second one, the third one were brought to
29 Monrovia. The last one was taken to Sam Bockarie. And when I

1 was going to Sam Bockarie I was supposed to meet him in Buedu,
2 but I was so lucky that I met him at Foya and so I told him that
3 we should move together to the border so that I can turn the
4 ammunition over to him."

15:45:05 5 Do you know about such an operation, Mr Taylor?

6 A. No.

7 Q. Very well. Move on. Now, the witness then goes on to
8 speak of another meeting. He says that after he arrived back in
9 Monrovia, the next day - page 856, line 20:

15:45:35 10 "He called me back to go to White Flower, and that I should
11 now try and look for one of the most senior officers of ULIMO -
12 that is the former ULIMO-K - who will now work alongside with Sam
13 Bockarie. And wherever the equipment was going, taking them from
14 Lofa area, going to the territory of the RUF, when they see one
15 of the ULIMO-K senior officers working alongside with Sam
16 Bockarie they will be free. They will feel free with them."

17 He goes on to explain that the person who called him back
18 to White Flower was you, at line 3, page 857:

19 "Mr Taylor called me back to White Flower and he gave me
15:46:28 20 another instruction that I should now look for one of the most
21 senior officers of the former ULIMO-K who will work alongside
22 with Sam Bockarie in Sierra Leone."

23 He goes on to mention that he is talking about:

24 "... the former fighters of ULIMO-K will now feel free
15:46:49 25 because the instruction was already there that they should
26 all feel free to go to RUF territories because RUF too was
27 looking for reinforcements and so they were recruiting. So
28 if they had one of the most senior officers of the ULIMO-K,
29 the senior officers hear that one of their senior officers

1 is working with Sam Bockarie they will feel free. Many of
2 them will feel free to go there.

3 Q. What did you do after this meeting with Charles Taylor?

4 A. From there I contacted Abu Keita."

15:47:29 5 Mr Taylor, did you ask Varmuyan Sherif to recruit Abu Keita
6 to assist you in your activities with Sam Bockarie?

7 A. Never. There is a second enemy now that I'm supposed to -
8 in major, major operation I'm going to get two former ULIMO
9 generals that just months before then were trying to kill me and

15:47:58 10 they are supposed to be central to my major operation in Sierra
11 Leone? It's a lie. I never told him to do that.

12 Q. Mr Taylor, we need to pause and consider the chronology of
13 events here. Now remember Mr Sherif tells us that after he
14 brought Bockarie to Monrovia on that first occasion, Bockarie

15:48:29 15 received a satellite phone.

16 A. Yes.

17 Q. Remember that?

18 A. Yes.

19 Q. Now you accept that you did indeed give Bockarie a
15:48:38 20 satellite phone, yes?

21 A. Yes. On his second trip.

22 Q. And when was the second trip?

23 A. In October.

24 Q. October of which year?

15:48:46 25 A. 1998.

26 Q. Bear that date in mind for this reason: The man Abu Keita
27 mentioned by Sherif, do you recall an account he gave as to how
28 he came to be recruited?

29 A. Yes.

1 Q. Do you remember that we are told that after the Camp
2 Johnson Road incident he is implicated and arrested?

3 A. Yes.

4 Q. And thereafter, after a period of a week or so, he
15:49:31 5 recruited to assist you, yes?

6 A. Yes.

7 Q. You remember that?

8 A. Yes.

9 Q. Now help us, please. Firstly, how did you come to recruit
15:49:42 10 Abu Keita? Was it through Varmuyan Sherif or was it following
11 the Camp Johnson Road incident in January? Which was it?

12 A. Neither. Neither.

13 Q. Try and help us. Which one is it?

14 A. Neither of the two. Here is - I didn't recruit him after
15:50:13 15 the incident, nor did I tell Varmuyan. Here is another incident.
16 Abu Keita, Mohamed Keita, just was involved in a second attempt
17 in September of trying to kill me. My government is attacked, he
18 is one of the combatants arrested and put in jail. The Mandingo
19 community, including Issa Sesay, asks for them to be released.

15:50:46 20 I'm supposed to immediately after this man just tried to kill me
21 - I'm talking about just a couple of weeks - designate him, or he
22 is brought to me and he is designated as a major operator for me
23 in Sierra Leone. Total, total nonsense.

24 Q. Now, there's another aspect to this that I want your
15:51:17 25 assistance with, Mr Taylor, because the suggestion also contained
26 in this passage is that you were, in effect, seeking to encourage
27 former ULIMO combatants to assist the RUF. Did you?

28 A. Never. No. No.

29 Q. Did you at any stage encourage any former Liberian

1 combatants from whatever faction to assist the RUF?

2 A. No. No.

3 Q. The witness continued in this way, line 25, page 857:

4 "Q. Who is Abu Keita?

15:52:14 5 A. I contacted Abu Keita and Abu Keita was deputy chief of
6 staff of ULIMO-K. His rank was major general."

7 Were you aware of that rank, Mr Taylor?

8 A. No, I was not aware of that. I knew he was a senior
9 general, but I was not aware of the rank.

15:52:34 10 Q. "He was one of the most senior officers that I would have
11 thought of at that time in the ULIMO-K and he told me that
12 he is unhappy about - he is suspicious about it because
13 these are people they have been fighting against. He
14 doesn't know whether his life would be secure or not.

15:53:03 15 Q. So you indicated that Abu Keita said he is suspicious
16 about it because these people have been fighting against
17 him and he doesn't know whether his life would be secure or
18 not. Who was he talking about, these people who had been
19 fighting against him?

15:53:17 20 A. He was talking to RUF people. He was referring to the
21 RUF people, because at that time now we wanted him to go
22 and work alongside with Sam Bockarie and he has been
23 fighting against Sam Bockarie for a very long time. So he
24 needed to readjust his mind whether he would feel it
15:53:40 25 necessary to do so or not."

26 Pause there, Mr Taylor. Tell me, were you aware of this
27 prior conflict between Abu Keita and Bockarie?

28 A. No. In fact, Abu Keita is expanding this when he says we
29 have been - in my interpretation he is talking about conflict

1 between ULIMO and RUF and that is far from what every witness
2 that talked about this contact from back in 1993 when the road is
3 cut off and the contact made with ULIMO, there is cooperation all
4 the way through 1997. So for Keita to even state, based on what
15:54:31 5 Varmuyan is saying here, that he had been fighting against ULIMO,
6 when did he fight the RUF? When? There is no time that he is
7 fighting the RUF.

8 Q. Now he continues:

9 "Q. What happened after this conversation?

15:54:53 10 A. Whilst we were on that, another fighting broke out in
11 September when Mr Taylor's government - that is Roosevelt
12 Johnson again. Roosevelt Johnson went for medical check-up
13 out of the country. When he came back we never knew where
14 he passed through. No security could identify the border
15:55:17 15 through which he passed. So Mr Taylor became very
16 concerned and so he invited Roosevelt Johnson at the
17 Executive Mansion and Roosevelt Johnson said he was not
18 coming. And the securities - the police were instructed to
19 arrest Roosevelt Johnson and we never knew because
15:55:37 20 Roosevelt Johnson too had bodyguards - a small armed group
21 - at his residence. So firing broke out at Camp Johnson
22 Road. Roosevelt Johnson resisted arrest."

23 That account, Mr Taylor, of the lead-up to the Camp Johnson
24 Road incident, do you accept it?

15:56:01 25 A. No, I don't.

26 Q. Do you accept that it was impossible to trace how Roosevelt
27 Johnson had got back into the country?

28 A. Yes, I accept that.

29 Q. And you accept, don't you, that thereafter there was some

1 suspicion about Roosevelt Johnson's activities?

2 A. I accept that, yes.

3 Q. And it resulted in a conflict at Camp Johnson Road, yes?

4 A. That is correct.

15:56:26 5 Q. And then it goes on, page 859, line 10:

6 "Q. So, it was after that incident that you again spoke
7 with Abu Keita?

8 A. Yes, Abu Keita accepted the offer. He said - then when
9 I contacted Musa Cisse, Musa Cisse said I should take Abu
10 Keita to Benjamin Yeaten's house.

15:56:49

11 I took Abu Keita to Benjamin Yeaten's house. The reason
12 was Sam Bockarie is there now waiting for Abu Keita. This
13 was the reason why he asked me, 'Now Sam Bockarie is waiting
14 for Abu Keita, you can take Abu Keita to Benjamin Yeaten's
15 house.' "

15:57:09

16 He locates where that is, confirms, "I took Abu Keita
17 there," and they had a meeting "when I saw Joe Tuah, Dopoe
18 Menkarzon, Benjamin Yeaten." Okay? Now, do you know anything
19 about that, Mr Taylor?

15:57:31

20 A. No.

21 Q. So Abu Keita is introduced, according to him, at your
22 request, to Abu Keita at Benjamin Yeaten's house. Is that true?

23 A. That's not true. How foolish would I be? That's not true.

24 Q. And he said, line 18:

15:57:45

25 "A. Sam Bockarie had a meeting and they were discussing
26 how to carry out the various attacks and Sekou was there.
27 He also would be there. In case there was anything coming
28 up for Guinea he was going to be the rebel leader, and also
29 RUF was instructed by Benjamin Yeaten to open an attack

1 from Sierra Leone territory to Guinea."

2 Now, pause there for a minute, Mr Taylor. Sekou, who is
3 that?

4 A. I have no idea.

15:58:20 5 Q. Do you know of a Guinean leader - a rebel leader by that
6 name?

7 A. No.

8 Q. And he concludes by saying that he had taken Abu Keita to
9 the meeting and "I just tried to make sure that Abu Keita was in
15:58:44 10 good hands before I took off."

11 Now, just to be clear, Mr Taylor, this recruitment of Abu
12 Keita, do you know anything about it?

13 A. Nothing whatsoever. I mean, I don't even think Abu Keita
14 was recruited.

15:59:09 15 Q. What do you mean?

16 A. All I can put it to, Abu Keita gets involved in this
17 situation in Monrovia. The situation I'm referring to is
18 Roosevelt Johnson. Abu Keita is arrested in Monrovia. And once
19 he is freed, he gets cold feet and decides that he is going to
15:59:28 20 run away because he doesn't trust - he knows nobody trusts him
21 anymore and he leaves Liberia, because these people, from 1993,
22 '94, '95, '96, '97 had been dealing with the RUF. In fact, they
23 dealt with the RUF longer than the NPFL. All of these, Keita,
24 the Varmuyans, they were right there in Voijnama, Kolahun, Foya,
15:59:58 25 across the border.

26 And don't let's forget, Varmuyan Sheriff told this Court
27 that he is what? Where is his mother from? Sierra Leone. He's
28 part Sierra Leonean. There was - nobody had to introduce these
29 boys to Sierra Leone. This is partly their home. These men,

1 this is their home. And so they had been dealing with these
2 people for five years, were in and out. Mohamed Abu Keita just
3 decided that he was at risk and left along with some of his boys.
4 This is the best I can put it how Abu Keita - it doesn't - for
16:00:38 5 God's sake, for somebody it say that Charles Taylor, knowing that
6 there are arms in 1998 in Lofa, and I need arms for my security,
7 will say, "Oh, there's a free zone. You all go ahead and sell
8 arms across the border." My God, no. No. No. These boys are a
9 bunch of liars. And Abu Keita that he is talking about who later
16:01:01 10 comes to this Court is under the control of this very Varmuyan.
11 That's how even Abu Keita came. Varmuyan had to bring Abu Keita
12 because he was senior to him. So it's just all a concoction.

13 Q. Who was senior to whom?

14 A. Varmuyan is senior to Abu Keita.

16:01:24 15 Q. Now, he goes on, Mr Taylor, to say this at page 864,
16 picking it up at line 8:

17 "A. I went to Foya to assess what was going on, because I
18 was now on the monitoring movement because the last
19 assignment that was given to me was to make sure whether
16:01:43 20 the RUF was moving freely and also the former fighters of
21 ULIMO-K who would want to go to Sierra Leone were moving
22 freely. Whilst I was doing that observation, when I got to
23 Foya I saw Benjamin Yeaten and Sam Bockarie together in
24 Foya. On my way back, I met with Zigzag Marzah. I met
16:02:05 25 with Zigzag Marzah, who told me, 'I have some logistics in
26 the vehicle. I am taking them to Sam Bockarie,' and these
27 logistics I mean arms and ammunition in the vehicle. He
28 also showed me money, that he had money. He had been
29 instructed to take it to Sam Bockarie from Mr Taylor."

1 Then he goes on to describe that it was a Land Cruiser jeep
2 loaded with - full up with arms and ammunition, but he couldn't
3 tell the exact quantity.

4 So there we have it, Mr Taylor. We have your director of
16:02:42 5 the SSS, Benjamin Yeaten, Sam Bockarie in Foya. We also have
6 Mr Zigzag Marzah, who you tell us is a bodyguard to Sam Bockarie.

7 A. No. To Benjamin Yeaten.

8 Q. To Benjamin Yeaten, sorry.

9 A. Yes.

16:02:59 10 Q. To Benjamin Yeaten. And we now have Varmuyan Sherif
11 spotting this vehicle with Zigzag Marzah loaded with arms and
12 ammunition destined for Mr Bockarie. What do you say about that,
13 Mr Taylor?

14 A. All I can just say, "My God." Benjamin Yeaten is supposed
16:03:28 15 to be going to Foya to meet with Sam Bockarie. I don't give him
16 arms, ammunition and money to give to Sam Bockarie. I gave the
17 arms, ammunition and money to his orderly after the fact. You
18 understand me? Now, what sense does it make, Varmuyan Sherif,
19 assistant director of SSS for operation, will leave Monrovia from
16:03:55 20 his duties and go to Foya and meet Benjamin in Foya? These
21 people are - my God. My God. My God. This is trouble.

22 How does this work? It's a lie. Why don't I give the
23 money to Benjamin? Why don't I give the arms to Benjamin? I'll
24 give it to his orderly after - who is this? If Varmuyan will
16:04:32 25 leave his post in Monrovia and go while Benjamin is also there?
26 No. It's not true. It's all a fabrication. It's all a
27 fabrication.

28 Q. Now, when we move on to page 866, testimony of 9 January
29 2008, we have this, first of all - there's two passages I want

1 you to deal with. First of all, beginning at line 4. He said
2 that he heard Sam Bockarie talking over the radio about the
3 attack on Freetown:

4 "When he was saying that he will not retreat except his
16:05:48 5 father tells him to retreat, and the journalists were asking him,
6 'Who is your father that you are referring to?', and he said,
7 'Charles Taylor'. And when that happened I think amongst the
8 bodyguard of Mr Taylor, who we are all together, we are all annoyed
9 about the news, why he had to publicly involve the man's name
16:06:12 10 because he said nobody would tell him to retreat except Taylor
11 tells him to retreat."

12 Mr Taylor, do you recall such an announcement by Sam
13 Bockarie over the BBC?

14 A. I don't recall it. It could have happened, but I do not
16:06:26 15 recall it, no. I have no recollection of this.

16 Q. Now, the testimony goes on in this vein, line 14 on the
17 same page:

18 "Q. ... You talked about a trip where you brought him to
19 see Charles Taylor. Now from that time," remember that's
16:06:49 20 late 1998, "that trip to see Charles Taylor, and the attack
21 on Freetown in January 1999, between those two time periods
22 did you see Sam Bockarie again in Monrovia?

23 A. Yes.

24 Q. How often did you see him?

16:07:07 25 A. I saw him over two time. I met him at Martina
26 Johnson's house and I also met him at Roberts International
27 Airport."

28 Now, pausing there for a second, Mr Taylor. In late 1998,
29 how many times, to your knowledge, did Bockarie come to Liberia?

1 A. Three times.

2 Q. Now, just to remind ourselves, first time, September, at
3 your request, yes?

4 A. That is correct.

16:07:47 5 Q. Second time, October, and you give him the satellite phone?

6 A. Yes.

7 Q. Again late November into December on his way to Burkina
8 Faso, yes?

9 A. That is correct.

16:07:54 10 Q. Okay. Now, the witness goes on to describe who Martina
11 Johnson is. Now, he goes on. He is asked:

12 "Q. Who is Martina Johnson?

13 A. Martina Johnson was one of the junior commandos of the
14 NPFL. He was a terrorist chief of staff."

16:08:37 15 What - "a terrorist artillery chief of staff". What gender
16 is Martina Johnson, Mr Taylor?

17 A. Martina is female.

18 Q. And was she the security director at the Roberts
19 International Airport?

16:08:58 20 A. That is correct, yes.

21 Q. That's true?

22 A. Yes.

23 Q. We find that at line 11 on page 867. He then goes on to
24 describe where Roberts International Airport is. And then

16:09:16 25 picking it up at line 24 on page 867:

26 "Q. On this occasion when you saw Sam Bockarie at Martina
27 Johnson's house, what happened when you met with him there
28 at her house?

29 A. We didn't actually talk much. I only went to speak to

1 him and that's all. The next time I saw him was at Roberts
2 International Airport."

3 Now, pausing. Do you know of any connection between
4 Martina Johnson and Sam Bockarie, Mr Taylor?

16:09:49 5 A. No, I don't know of any connection, but it's possible that
6 Martina knew Sam. But I don't know the connection. With -
7 because Martina was a senior general in the NPFL at the time, and
8 so the chances are she would know Bockarie. And she was always
9 in the company of Benjamin Yeaten, so I'm sure they would know.

16:10:28 10 Q. Now, was she the director of security at the Roberts
11 International airport in late 1998?

12 A. Yes.

13 Q. Now, the witness continues, page 868, line 1:

14 "Q. How did it happen that you saw him at Roberts
16:10:50 15 International Airport?

16 A. We were instructed by Mr Taylor that there are arms and
17 ammunitions coming. Paul Mulbah was with us and he was
18 the police director and he was responsible to go and
19 receive these arms and ammunitions. So, we all travelled
16:11:04 20 together to the airport."

21 Now, Paul Mulbah, was he the police director?

22 A. Yes, he was.

23 Q. Line 15:

24 "Q. You travelled to the airport together?

16:11:17 25 A. Yes.

26 Q. And when you got to the airport what happened?

27 A. I saw Joe Tuah, Musa Cisse and Sam Bockarie. Martina
28 Johnson had a restaurant at the back of the airport so
29 they were all seated there together discussing what the

1 quantities were that they will receive each and I heard it
2 myself. When Paul Mulbah said, 'Look, I have just
3 received this thing. I have to take it first to White
4 Flower before anybody gets any supply. Nobody is going to
16:11:47 5 get any supply right from here.' So that happened at
6 Roberts International Airport. And these ammunitions were
7 received and they were taken to White Flower and the
8 ammunition was distributed to the various front lines."

9 Now, Mr Taylor --

16:12:06 10 A. But what year? What time is he talking about? This can't
11 be --

12 Q. Well, remember the time frame mentioned right at the outset
13 was between the first time that he met - he brought Sam Bockarie
14 to you and the Freetown invasion in January 1999. You remember
16:12:25 15 that's the period he is asked about?

16 A. Yeah, but then he could not have seen Paul Mulbah because
17 Paul Mulbah is not police director at this time. Tate is still
18 not dead, so except he foresaw Tate's death. Tate is not dead by
19 late 1998.

16:12:45 20 Q. Because when we go back to page 866 we see:

21 "Now from that time, that trip to see Charles Taylor - that
22 is when he brought Bockarie to Charles Taylor - and the attack on
23 Freetown in January 1999. Between those two time periods did you
24 see Bockarie again in Monrovia?"

16:13:03 25 That's when he says at Martina Johnson's and at Roberts
26 International Airport.

27 A. Then he is lying.

28 Q. So that's the time frame we're talking about. So,
29 question, was Paul Mulbah police director at the time?

1 A. No.

2 Q. Who was police director at the time?

3 A. Joe Tate.

4 Q. Now, do you recall an occasion, Mr Taylor, when arms and
16:13:32 5 ammunition came in at Roberts International Airport and were
6 taken to White Flower, your home address?

7 A. No. In fact, as he mentions here, he said at the various
8 front lines. At the various front lines. So he is talking about
9 combat. There is no fighting going on inside Liberia where there
16:14:02 10 are front lines prior to January 1999 where there are these - to
11 the various front lines that he is talking about. So if there's
12 any period that he is talking about here about - about material
13 coming to Liberia, which materials do come to Liberia, he must be
14 talking about 2001.

16:14:27 15 So it's totally off because he is talking about various
16 front lines. There's no active war going on in Liberia at this
17 time. So I don't know which front line he is taking material to
18 in late 1998. And we have to stop it there because the invasion
19 of Sierra Leone takes place in January - 6 January. So it's not
16:14:51 20 possible that he could have been taking - so he confuses it. He
21 is talking about 2001. He cannot be talking about this period.
22 And in 2001 Paul Mulbah is director of police.

23 Q. Right. He continues by saying that ammunition goes to
24 White Flower, page 869, line 13:

16:15:35 25 "It was after everyone - Paul Mulbah always received
26 ammunition. Sometimes Musa Cisse say to me that he personally
27 also went to Burkina Faso and got arms and ammunition and bring
28 them to White Flower."

29 Now pause there, Mr Taylor. Did you send someone with Sam

1 Bockarie to Ouagadougou in late November/December 1998?

2 A. Yes.

3 Q. Who?

4 A. Musa Cisse.

16:16:07 5 Q. Right. Now you notice the juxtaposition here, don't you,
6 Mr Taylor?

7 A. Yes.

8 Q. We have Bockarie at Roberts International Airport, yes?
9 Then we have this mention of Musa Cisse travelling to Burkina

16:16:28 10 Faso and arms and ammunition. Do you follow?

11 A. Yes.

12 Q. And you accept that Musa Cisse did go with Bockarie to
13 Ouagadougou in late 1998, yes?

14 A. Yes.

16:16:41 15 Q. One possible suggestion may be, Mr Taylor, that this
16 shipment which arrives at Roberts International Airport, as
17 described by Sheriff, was something arranged in Ouagadougou during
18 that trip. Do you see how it all fits together?

19 A. Well, that's how he wants to put it, but the whole point is
16:17:11 20 lost because if we look at it from that position then we would

21 not get the point. This man talks about Paul Mulbah being at the
22 airport, receiving ammunition that he divides at various front
23 lines. Then he talks about where Musa Cisse is telling him that
24 sometimes he gets it from Burkina Faso. So I'm not sure if he is

16:17:38 25 talking about 1998. He may be talking about something different.
26 Because when you put the whole picture together of dividing arms
27 at the front line, which is talking about a period of war, and
28 you're talking about Paul Mulbah who is police director who is
29 not police director because Joe Tate is still alive in 1998, so

1 he cannot be talking about the same thing. Taken in this
2 simple context there is the appearance of this, but look at the
3 whole statement and you can see that he is talking pure nonsense
4 because all of these things don't fit together to give the
16:18:16 5 picture that maybe he is led to try to give because as soon as
6 you mention Joe Tate - you mention Paul Mulbah, police director,
7 I know is 1999 after the death of Joe Tate. So when you say he
8 is taking - he, Varmuyan Sherif, is taking materials to various
9 front lines then I know he is - in Varmuyan Sherif's statement
16:18:46 10 when does he say he is appointed as director of chief of security
11 for the army division? That gives you the time of the war.

12 Remember he talks about being sent to immigration and at
13 immigration he is appointed. So he is talking about the time of
14 the war. So we cannot tie it to 1998. Then he mixes up - he
16:19:09 15 forgot his cue, okay. Because he is at immigration by 2000.
16 That's when he is at immigration. So he can't have it here where
17 he is trying to tie it into this period. All the incidents that
18 he has mentioned point to somewhere other than the 1998 that he
19 is talking about. A little earlier he mentioned when he is
16:19:38 20 assistant chief of security but --

21 Q. He don't give a date when he was appointed as assistant
22 chief.

23 A. Yeah, but he does talk about when he leaves and he is sent
24 as immigration - at the immigration.

16:19:50 25 Q. I can remind you, Mr Taylor, it's page 813. It begins
26 really at page 810 where he says at line 20 in 1995 appointed
27 assistant director of operations.

28 A. No, that's not what I'm talking about. I'm talking about
29 he speaks about when he leaves the SSS after my being elected as

1 President.

2 Q. Yes, my fault. It's page 874, line 12:

3 "Q. I would like to ask you some questions about your job,
4 the army division and these army militias, but first of all
16:20:34 5 tell us again the time period during which you were the
6 deputy chief of staff for the army division?

7 A. From 2001 to the end of 2002 I was deputy chief of
8 staff army division."

9 A. That's the war. So that's the war. That's the
16:20:52 10 distribution of material at various front lines. So when you put
11 that in and then you put the Paul Mulbah in you can see where
12 he's mixed the whole thing up, so he cannot be referring to 1998
13 going to the invasion of Freetown in 1999, okay. That's the
14 point I'm trying to make.

16:21:10 15 Q. Got you. In relation to these arms which he says were
16 taken from Roberts International Airport to White Flower, he is
17 asked this, line 17, page 869:

18 "Q. Do you know if anyone at White Flower was in charge of
19 taking care of these arms and ammunition?

16:21:38 20 A. It was Mr Taylor who had total control over that White
21 Flower and he had his attendants who worked with him.
22 Sometimes he will tell them to give this amount to such a
23 person and that would be the only time when they will open
24 the warehouse and give the stated amount to that person.

16:21:59 25 That area was controlled by himself."

26 Is that true, Mr Taylor? You remember we looked at the
27 photographs today?

28 A. Yes. I had control over my house, that's true. But the
29 warehouse I did not, no. I did not even - as President of

1 Liberia I had more to do than try to be, what, a warehouse
2 superintendent? No. That warehouse was controlled by Benjamin
3 Yeaten. It is true arms were kept in that warehouse. And it was
4 a part of their job to make sure that I was protected so - but I
16:22:33 5 had nothing to do with what was going on at the warehouse, no.

6 Q. Okay. He is further asked this in relation to this meeting
7 at the Roberts International Airport, line 29, page 826:

8 "Q. This meeting that you had with Sam Bockarie at Roberts
9 International Airport, did that occur before or after the
16:22:57 10 meeting at Martina Johnson's house?

11 A. After the meeting at Martina Johnson's house. The
12 second time I saw him was at the Roberts International
13 Airport.

14 Q. And do you recall when saw him at Roberts International
16:23:12 15 Airport, was this before or after you heard him on the
16 radio?

17 A. I met him before. I met him before the Freetown attack
18 took place."

19 And remember that's the reference to the BBC radio thing
16:23:28 20 where he says he won't retreat until he gets word from his Pa,
21 yes?

22 A. Yes.

23 Q. So he is there making quite clear, Mr Taylor, when it is
24 he's suggesting this meeting took place.

16:23:53 25 A. Yeah, but then that means he's got it all mixed up. No.
26 If he is talking about meeting - if he is at the airport with Sam
27 Bockarie in 1998 then he did not see any Paul Mulbah as police
28 director. That's a blatant, blatant lie. And all we have to do
29 is to bring the death certificate of Joe Tate and bring the date

1 that Paul Mulbah was put in as police director. That will be the
2 end of that lie. Paul Mulbah is not police director in 1998.
3 That's a lie.

4 Q. Just a quick question, Mr Taylor, let's see if we can
16:24:29 5 answer it shortly. When LURD attacked in 1999 did you invite the
6 RUF to assist you?

7 A. No, I did not.

8 Q. That's page 872 at line 18. Mr Taylor, in 1999 did
9 Varmuyan Sherif travel with you to Lome to an ECOWAS meeting?

16:24:56 10 A. 1999? I'm not too sure. I will have to really reflect on
11 the delegation. It's possible. It's possible. It could have
12 been his time because what they used to do is to - travelling
13 gave people an extra chance to have extra money. It's possible.
14 I wouldn't be able to remember, but it's possible.

16:25:24 15 Q. Another quick little question. Page 881, line 5, the
16 witness is describing various units operating within Liberia and
17 he gives this description:

18 "A. The anti-terrorist was the Cobra Unit for Mr Taylor.
19 They were especially people who were mercenaries. We had
16:25:50 20 the RUF unit, we had a Burkinabes base, we had Gambians and
21 we had Ivorians. When the NPFL came to power there was not
22 any space for all of the mercenaries to be put into
23 positions or immigration, or other places. So they had
24 some SSU, special security division - SSU, yes - and then
16:26:12 25 we had the anti-terrorist. Those units you finally realise
26 that most of the mercenaries were amongst them because they
27 were directly operating under the executive. They cannot
28 go anywhere except by Mr Taylor's instructions or Benjamin
29 Yeaten's instruction or by Chucky Taylor's instruction."

1 Were those units composed of mercenaries, Mr Taylor?

2 A. Never. Never.

3 Q. But the ATU did have a large number of RUF - former RUF
4 combatants in it, didn't it?

16:26:47 5 A. But they were not mercenaries.

6 Q. What about Burkinabes? Were there Burkinabes in the ATU?

7 A. Not one. Not one Ivorian. Not one Ghanaian. Not one - the
8 ATU --

9 Q. Gambians?

16:27:02 10 A. Not one Gambian. All of the Gambians that came to Liberia
11 were trained Special Forces. And, in fact, they even assisted in
12 training the ATU along with the contractors, the general from
13 South Africa. There was not one Gambian as a member of the ATU.
14 No.

16:27:24 15 Only Liberians were members of the ATU. And I'm using it
16 generally because even those that came with Bockarie, before we
17 put them in - in fact, I'm sorry we did not get into that portion
18 of Jabaty Jaward's testimony when he was asked as to whether they
19 were told that they had been given citizenship. In his evidence
16:27:45 20 he said yes.

21 Q. Well, Mr Taylor, whilst we've still got the thought in
22 mind, can we swiftly, given the time, just deal with another
23 aspect of this. Because on the same page he goes on to say - he
24 is asked to explain what he means by mercenaries, and he say,
25 line 25:

26 "A. Foreign troops. Foreign troops. Under our
27 constitution you cannot recruit another citizen from a
28 different country into our SSS.

29 You cannot recruit them into our SSS. You cannot take a

1 foreign citizen or a foreign mercenary and enlist them into
2 the Liberian army or the police. The immigration and
3 police and the army were meant for citizens. This unit I'm
4 referring to, the SSU and the anti-terrorist, they were not
16:28:35 5 members of that Act that created the army of Liberia. By
6 that I mean these people were paid out of Mr Taylor's
7 pocket directly, so it was a new creation that he made that
8 he himself was paying the people."

9 You see that, Mr Taylor?

16:28:52 10 A. Yes, I see.

11 Q. What do you say?

12 A. It shows the level of his education. Does he know anything
13 about the constitution of Liberia? He doesn't know his --

14 Q. No, no, no. Were there mercenaries in the ATU and the SSU
16:29:09 15 who were being paid directly out of your pocket?

16 A. There were no individuals in Liberia paid out of my pocket.

17 MR GRIFFITHS: Would that be a convenient point,
18 Mr President?

19 PRESIDING JUDGE: Yes, that's a convenient moment.

20 MR GRIFFITHS: Thank you very much.

21 PRESIDING JUDGE: We'll adjourn now until 9.30 next Monday.

22 Mr Taylor, there's an order that you are not to discuss
23 your evidence.

24 [Whereupon the hearing adjourned at 4.29 p.m.
16:29:50 25 to be reconvened on Monday, 2 November 2009 at
26 9.30 a.m.]

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I N D E X

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