



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 7 DECEMBER 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 Sidney Thompson

For the Registry:

Ms Rachel Irura
Mr Benedict Williams

For the Prosecution:

Ms Brenda J Hollis
Mr Nicholas Koumjian
Ms Kathryn Howarth
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Morris Anyah
Mr Terry Munday
Ms Salia Moi Lanen

1 Monday, 7 December 2009

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:32:04 5 PRESIDING JUDGE: Good morning. We will take appearances,
6 please.

7 MS HOLLIS: Good morning, Mr President, your Honours,
8 opposing counsel. This morning for the Prosecution, Brenda J
9 Hollis, Nicolas Koumjian, Kathryn Howarth, and our case manager,
09:32:46 10 Maja Dimitrova.

11 PRESIDING JUDGE: Thank you. Yes, Mr Griffiths.

12 MR GRIFFITHS: Good morning, Mr President, your Honours,
13 counsel opposite. For the Defence today, myself Courtenay
14 Griffiths, with me my learned friends Mr Morris Anyah and
09:32:59 15 Mr Terry Munyard. Also with us today, Mr Michael Herz and our
16 case manager Ms Salla Moilanen.

17 PRESIDING JUDGE: Thank you.

18 MR GRIFFITHS: Mr President.

19 PRESIDING JUDGE: Yes, Mr Griffiths.

09:33:11 20 MR GRIFFITHS: There is an application - or should I say
21 two applications - which I would like to make this morning
22 orally.

23 What you see here is what was provided to us at 12 minutes
24 past - at 3.30 on Friday.

09:33:36 25 PRESIDING JUDGE: I'm sorry, when you say "what you see
26 here" - oh, in front of you there.

27 MR GRIFFITHS: All of this was disclosed to us at 3.30 on
28 Friday and we are told --

29 JUDGE SEBUTINDE: Mr Griffiths, don't you think you should

1 describe "this" on the record?

2 MR GRIFFITHS: We are talking about five lever arch files.
3 In addition, we have the material disclosed to us during the
4 cross-examination of Mr Koumjian. That's another lever arch file
09:34:08 5 plus the initial disclosure. So in total we now have some 165
6 documents which were disclosed to us by 3.30 on Friday afternoon.

7 Now, upon receipt of the one set of documents, which was
8 not provided to us in electronic format, my case manager,
9 Ms Moilanen, attempted to photocopy them. Unfortunately, the
09:34:41 10 photocopier in the Defence office was not working. She inquired
11 from Court Management whether or not it would be possible to have
12 them reproduced and was told that could not be done. So
13 consequently, copies have not been made and have not been
14 provided, either to me or to Mr Taylor or, indeed, any other
09:35:04 15 member of my staff apart from our case manager, who received it.

16 Now, the context in which I make this application,
17 Mr President, is this: In our submission, the Office of the
18 Prosecution by this disclosure concedes that on one
19 interpretation, as demonstrated on Thursday of last week when
09:35:33 20 Mr Koumjian sought to deploy certain documents, ostensibly purely
21 for impeachment purposes, when we discovered that almost all of
22 those documents sought to be used could also be probative of the
23 guilt of the accused.

24 Now, there is nothing surprising here, since the borderline
09:35:56 25 between cross-examination as to credit and cross-examination on
26 issues that may be probative of guilt is difficult, if not
27 impossible, to determine. We demonstrated that, we submit, on
28 Thursday last, and your Honours were perforce required to
29 indicate to Mr Koumjian that all of the - almost all of the

1 documents he sought to be - introduce fell into both categories
2 delineated by your Honours in your decision of last week.

3 Now, we having come to this stage, in our submission,
4 before any document can be used we must address whether, first of
09:36:43 5 all, it is in the interests of justice that the document be used;
6 secondly, that it does not violate the fair trial rights of the
7 accused, bearing in mind also given the volume of the material
8 now disclosed, that this Court is enjoined by Rule 89 to always
9 have in mind the spirit of the statute and the general principles
09:37:10 10 of law to be applied in this tribunal; and furthermore, this
11 Court is also enjoined by Rule 90(F) to avoid the wasting of
12 time.

13 As an indication of how, in our submission, time will be
14 wasted, let me give your Honours an example of one of the
09:37:36 15 documents disclosed on Friday afternoon. It's a declaration by
16 Mia Farrow, the actress, following a telephone conversation she
17 had with Mr Koumjian, in which - and that conversation took place
18 in August of this year - in which that Hollywood actress claims
19 that Mr Taylor caused a diamond to be given to her whilst in
09:38:07 20 South Africa. That is an indication of the quality of the
21 material this man is now supposed to be dealing with when all of
22 this is dumped on him at the last minute.

23 Now, in our submission, bearing in mind all of these
24 principles, bearing in mind also the unfulfilled expectation
09:38:32 25 expressed by your Honours at paragraph 22 of your decision in
26 anticipation of being in a position to make specific orders
27 relevant to the documents sought to be used, it seems to us a
28 most efficient and helpful use of the Court's time for
29 your Honours now to be provided with all of the documents given

1 to us so that the expected and necessary judicial supervision can
2 be applied. This would have the advantage, in our submission,
3 that all parties would know where they stand and the trial could
4 proceed expeditiously.

09:39:22 5 So the first application I make is that the proceedings be
6 adjourned today to give your Honours time to consider all of this
7 material, because in our submission, assessing each document as
8 it is presented in evidence will be time consuming and affect the
9 smooth running of the trial and would also prevent the prejudice
09:39:52 10 caused to the accused by the stop-start nature of his
11 cross-examination over the last four weeks.

12 Now we need to bear in mind, of course, that this is the
13 first tranche of documents. Full disclosure will not be
14 concluded until close of business tomorrow, so we anticipate
09:40:18 15 receiving even more documents. The question I ask is this: How
16 is the accused and his lawyers supposed to assimilate all of this
17 material whilst he is in Court from 9.30 to 4.30 every day, along
18 with his lawyers, being cross-examined? How is he supposed to do
19 that? How are we supposed to advise him in these circumstances?

09:40:48 20 By way of example, suppose these documents taken in toto
21 totally undermines the defence put forward by the defendant? We,
22 as his lawyers, in the circumstances would be professionally
23 obliged to advise him, for example, to reconsider his plea. We
24 would be professionally required to do that. How are we going to
09:41:15 25 do that if we do not have, to quote the statute, "Adequate time
26 and facilities for the preparation of his defence and to
27 communicate with his counsel of his or her own choosing", how is
28 he supposed to exercise that right?

29 Because in our submission, your Honours - and I say this

1 quite bluntly - the Prosecution have totally lost sight of the
2 guarantees provided to an accused by Article 17. They have
3 already sought to ignore his access to legal advice. They have
4 also sought to ignore his right to be provided in detail with the
09:42:04 5 nature and content of the case against him. Now they are seeking
6 to ignore, in our submission, his right to have adequate time and
7 facilities to prepare his defence.

8 We need, in this regard, to contrast the situation during
9 his examination-in-chief when we were required by order of this
09:42:27 10 Court to provide the Prosecution with copies of documents we
11 intended to rely upon two weeks before they were due to be used,
12 and in our case, in a couple of days, we have been presented with
13 this. In our submission, it's just not fair.

14 So the two requests we make are these: Firstly - and I
09:42:52 15 make no apology for making this request, because, in our
16 submission, it's prompted by the cavalier attitude displayed by
17 the Prosecution towards this accused's rights under Article 17.
18 So I am firstly asking for an adjournment and that this
19 cross-examination should not continue until the new year.

09:43:20 20 So I am asking that we be given the remainder of this week
21 and also the recess in order to properly assimilate this
22 material, advise the accused as to his rights so that the
23 guarantees provided to him under Article 17 are properly
24 recognised.

09:43:40 25 Now, before I sit down, could I make one correction. I am
26 told that the diamond in South Africa was actually given to the
27 model Naomi Campbell, but this was reported to Mr Koumjian in
28 that telephone conversation by Mia Farrow.

29 Mr President, that is my application.

1 PRESIDING JUDGE: Just before you sit down, Mr Griffiths,
2 we have taken note of all your submissions, but you said you had
3 two applications. Now, if I am not wrong, the applications are:
4 Firstly, you are applying for an adjournment to consider all of
09:44:23 5 this material; and, secondly, that adjournment - I will withdraw
6 that.

7 You are applying for an adjournment to consider all of this
8 material. You are asking that - the Court to call for the
9 material, to consider it and to exercise some judicial control;
09:44:46 10 and finally, you are asking that the accused and Defence be given
11 the rest of this week and the recess to assimilate all of this
12 material.

13 MR GRIFFITHS: It really comes down to two things,
14 Mr President: Firstly, the adjournment until the new year;
09:45:04 15 secondly, that your Honours be provided with all the material we
16 have been given so that your Honours can properly consider the
17 documents and decide, firstly, which category they fall into; and
18 secondly, if it is the second category, what use can be made of
19 it.

09:45:24 20 It may be premature at this stage to be considering issues
21 of admissibility, but I note that in the second part of your
22 Honours' decision, use and admissibility is made and/or, and so
23 it seems that the initial question is can the documents be used
24 bearing in mind, firstly, the interest of justice and, secondly,
09:45:50 25 whether or not such use would violate the fair trial rights of
26 the accused?

27 So we submit that your Honours should be in a position to
28 make that decision in the round to avoid the kind of hiccups we
29 had last week where a document is presented, then there is a

1 hiatus whilst we consider issues surrounding it, and in our
2 submission, it's unfair to the accused for his cross-examination
3 to be proceeding in that way. Better if we come back, in our
4 submission, in January, knowing precisely what documents the
09:46:27 5 Prosecution can use and for what purpose. In our submission,
6 that would aid both sides and the smooth running of the case.
7 That's application number one.

8 The second application is merely the application for the
9 adjournment.

09:46:42 10 PRESIDING JUDGE: Yes, that's clear now. Thank you,
11 Mr Griffiths. I assume the Prosecution wishes to reply to those
12 applications.

13 MS HOLLIS: Thank you, Mr President. Yes, we do. First of
14 all, the disclosure of the documents which are being disclosed is
09:47:02 15 not a concession by the Prosecution that indeed they fall under
16 (ii), because our reading of the decision that your Honours
17 placed before us, both (i) and (ii), in connection with the
18 explanatory paragraph 27 is that documents or material that we
19 intended to use for the purposes of impeachment only need not be
09:47:28 20 disclosed. The great majority - the overwhelming majority of the
21 material we intend to use will be for impeachment only, so we do
22 not concede a disclosure obligation.

23 To ensure that we complied with your Honours'
24 interpretation of your decision we disclosed all of the material
09:47:48 25 but not because we believed that it actually was other than
26 material under (i), material intended for the sole purpose of
27 impeachment which does not require disclosure. Nonetheless, we
28 have disclosed it.

29 In terms of the Defence argument that the line between the

1 use of evidence for credit and the use of evidence for guilt is
2 very difficult, if not impossible, to determine must be rejected
3 even in jury trials because even when you are not before
4 professional judges evidence may be offered and accepted and used
09:48:32 5 for a limited purpose. And we have made it very clear that the
6 overwhelming majority of the material we seek to use is for the
7 limited purpose of impeachment. There are no cute little games
8 that we intend to play. If it is for the purpose of guilt, the
9 proper procedure will be followed and notice will be given, as
09:49:00 10 notice was given on Friday to the Defence of which materials we
11 intended to use today and tomorrow among all the materials that
12 were disclosed and of those which, if any, were intended to - we
13 would ask the purpose also be to prove guilt.

14 And the Mia Farrow affidavit was the one instance that we
09:49:25 15 would use to prove guilt as well, or ask your Honours to consider
16 for guilt as well. So it is not only possible, it is often done
17 in trials, especially before judge alone, professional judges,
18 that material is used and clearly identified for a particular
19 purpose. So there is nothing difficult about that.

09:49:49 20 In terms of wasting of time, we have attempted to move
21 forward efficiently and certainly we do not wish to waste time.

22 In terms of the quality of materials that have been
23 provided, that is for your Honours to determine either at the
24 time of admission where you would find they are not relevant or,
09:50:13 25 the other appropriate test, have not been met or at the time you
26 consider all of the evidence. So speaking of the quality of
27 material at this point is immature.

28 In terms of the argument about the Defence's ability to
29 advise their client, if the Defence is totally undermined because

1 the Prosecution evidence shows that the accused has not testified
2 truthfully before you, that is not a denial of a right to a fair
3 trial. Even an accused doesn't have a right to come forward and
4 testify untruthfully. So materials used for impeachment, first
09:50:56 5 of all there is no right to give legal advice on those and,
6 secondly, it certainly would not undermine the accused's fair
7 trial rights if he has chosen to testify untruthfully and the
8 impeachment materials show the lack of truthfulness of his
9 testimony.

09:51:13 10 The Prosecution has done anything but act in a cavalier
11 manner. We reject that. We find it is unfounded and unfair. We
12 have attempted very diligently to comply both with what we
13 understood your decisions to be and then what we learned
14 subsequently your decisions were meant to involve, if we did not
09:51:33 15 understand this.

16 In terms of providing your Honours with all of the material
17 that we disclosed, we are most happy to do that. We are most
18 happy to do that. Now, as to the potential use of that, of
19 course, that will depend upon how it is used in cross-examination
09:52:00 20 and any arguments that would be put forward. But in terms of
21 providing your Honours with that material, you are professional
22 judges; just as with the Defence MFIs, if ultimately you do not
23 admit them into evidence, you simply disregard them. So we are
24 happy to provide that to your Honours if your Honours wish it.
09:52:20 25 We do not know that it is necessary, but, if your Honours wish
26 it, we are very happy to do that and we find it no violation of
27 any procedural or other rights or procedures.

28 In terms of an adjournment to consider the materials, the
29 Defence will be getting materials that we intend to ask you to

1 consider for guilt as well as the vast majority of materials that
2 we only intend to ask you to consider for impeachment. If the
3 Defence needs the time to talk to their client about those which
4 we will ask you to consider for guilt, not those which
09:52:58 5 hypothetically may be probative of guilt, then of course that is
6 something that they should have the right to do.

7 But we do want to point out to your Honours our position is
8 that it doesn't matter what hypothetical uses material may be put
9 to. If the party using the material asks you to limit
09:53:20 10 consideration of that material to a particular use, then what
11 scenario are you faced with? Either the imposing party will say
12 don't just use it for impeachment, also use it to consider guilt.
13 We don't think that will happen. Or your Honours independently
14 will determine that you wish to use it as probative of guilt even
09:53:43 15 though we are asking you only to consider it for impeachment.
16 That is of course within your prerogative but we find that
17 unlikely as well.

18 So we do not believe there is this huge amount of material
19 that the Defence will have to advise their client on because
09:53:57 20 there is only a very small amount of that material which we will
21 be asking your Honours to consider for purposes of proof of
22 guilt. The overwhelming majority we will be asking your Honours
23 to consider only insofar as it impeaches the 7,200 plus pages of
24 direct examination and/or the some 300 documents that have been
09:54:22 25 marked for identification.

26 So the bottom line after all those comments is: Should
27 your Honours wish the material, we are most happy to provide it
28 to you. And should the Defence feel it needs this time to
29 discuss and give legal advice relating to documents which we will

1 have clearly identified that we will seek your Honours to
2 consider for guilt, then of course that is within their rights
3 and it's up to your Honours' discretion. Those are our
4 submissions, Mr President.

09:54:53 5 PRESIDING JUDGE: Just before you sit down, we have been
6 told by the Defence that up until Friday, Friday afternoon, they
7 have been served with 165 documents. How many more documents are
8 you going to serve on them?

9 MS HOLLIS: I cannot give you an accurate number but there
09:55:13 10 are a substantial number of documents and these documents, as I
11 indicated, will be used for matters that arise out of this
12 accused's 13 weeks, 7,200 page direct examination and the some
13 300 documents that have been marked for identification. But I am
14 bad at estimates, I don't want to give you an estimate, but there
09:55:37 15 will be a substantial additional number. They will all be
16 disclosed as of close of business tomorrow as per the direction
17 of your Honours.

18 PRESIDING JUDGE: Thank you, Ms Hollis. Well, do you wish
19 to reply to that response, Mr Griffiths?

09:55:55 20 MR GRIFFITHS: Just to say this, Mr President: In our
21 submission, my learned friend's argument betrays the real
22 difficulty now faced by this Court because it seems to us it's
23 really not for a party to proceedings to be the ultimate
24 decision-maker as to which category documents fall into. In our
09:56:29 25 submission, that is a judicial decision and it is not for my
26 learned friend to say that hypothetical considerations are
27 unimportant, when in the same breath she concedes that it may
28 well be open to your Honour in due course to use the additional
29 matters included in those documents of your own volition in

1 support of guilt.

2 Now, in our submission, if there is - and by the argument
3 my learned friend is conceding that the documents can be used, if
4 only hypothetically, for more than one purpose, why are we being
09:57:13 5 provided with those parts which hypothetically could be proof of
6 guilt and which she concedes in due course your Honours may well
7 decide to rely upon in proof of guilt?

8 Bearing in mind the very fine line here between the two
9 categories, it seems to us that it's for your Honours to make
09:57:36 10 that decision, not for the Prosecution. And it seems to us that
11 your Honours should be given sufficient time to discharge, in our
12 submission, that important judicial function. That's all I say
13 in reply.

14 PRESIDING JUDGE: All right. Thank you. We are going to
09:57:54 15 have to adjourn --

16 [Trial Chamber conferred]

17 JUDGE SEBUTINDE: Mr Griffiths, I just seek clarification
18 from you. On Thursday last when we adjourned, the Defence, if I
19 recall properly, asked for an adjournment till Monday to consider
09:59:14 20 that batch of financial documents that had been disclosed on
21 Thursday with a view that you would have been ready today to
22 proceed with the trial in respect of those documents, just the
23 financial documents.

24 MR GRIFFITHS: We are in a position to proceed on just the
09:59:32 25 financial documents, although there is a submission I would make
26 in respect of one part of it.

27 JUDGE SEBUTINDE: So when we are going to retire to
28 deliberate on your applications, we just wanted clarification,
29 are you prepared to continue this trial this week at least in

1 relation to the financial documents?

2 MR GRIFFITHS: Yes, I am.

3 JUDGE SEBUTINDE: And that would be fine with the
4 Prosecution as well?

09:59:59 5 MS HOLLIS: Yes indeed.

6 JUDGE SEBUTINDE: Thank you.

7 PRESIDING JUDGE: We are going to have to go off the Bench.
8 We are not sure how long we will be, but we will let everybody
9 know when we are ready to come back on with a decision on the
10 applications that have been made this morning.

10:00:21

11 Mr Taylor, no need for you to sit there waiting for us.
12 You can leave the courtroom and we will send word to you when we
13 are ready to come back.

14 [Break taken at 10.00 a.m.]

11:34:06

15 [Upon resuming at 12.01 p.m.]

16 PRESIDING JUDGE: Before the Trial Chamber are two
17 applications by the Defence. Firstly, the Defence seeks an
18 adjournment until the new year in relation to the material served
19 on it by the Prosecution which the Prosecution intends to use in
20 cross-examination of the accused. The Defence points out that up
21 to 3.30 p.m. last Friday, a total of 165 documents were served on
22 them. We note also, the Prosecution advised today, that there
23 are a substantial number of documents still to be served.

12:04:41

24 Furthermore, the Trial Chamber has seen in Court the lever arch
25 files containing the documents already served on the Defence and
26 they are indeed voluminous.

12:05:13

27 Secondly, the Defence applies for an order that all the
28 material served on the Defence by the Prosecution be also
29 provided to the Bench so that judicial supervision can be applied

1 in deciding which documents fall into category 1 and which
2 documents fall into category 2 of the Trial Chamber's decision
3 dated 30 November 2009.

4 At the outset, the Trial Chamber wishes to state that it is
12:06:03 5 surprised to hear the Prosecution today is still misunderstanding
6 the Trial Chamber's order of 30 November 2009. The disclosure
7 obligation of category 2 documents is based on the content - I
8 emphasise that word content - of the documents and not, as the
9 Prosecution seems to think, the intended purpose for which the
12:06:33 10 Prosecution wishes to use the documents.

11 Neither of the Defence applications is opposed by the
12 Prosecution.

13 Moreover, in view of the volume of documents served on the
14 Defence, the Trial Chamber considers that the Defence's first
12:06:55 15 application for an adjournment until the new year is reasonable
16 and is granted accordingly, that is, upon completion of today's
17 proceedings.

18 As regards the Defence's second application, the Trial
19 Chamber orders as follows: (1) that the Prosecution provide the
12:07:18 20 Trial Chamber with all material referred to earlier which has
21 been or will be served on the Defence; (2) in order to render the
22 volume of material manageable and to save time that the
23 Prosecution indicate both to the Bench and to the Defence on each
24 document, firstly, which passage or passages will be used to
12:07:48 25 impeach the credibility of the accused and, secondly, which
26 passage or passages will be used to prove the guilt of the
27 accused; (3) in light of order 2 and also in light of the volume
28 of material that we have seen in Court today and the material yet
29 to be served, we extend the time limit for disclosure of these

1 documents to close of business Friday, 11 December.

2 Now we will proceed with the matter concerning the bank
3 statements. I think that's your matter, Mr Koumjian.

4 MR KOUMJIAN: Yes.

12:08:39 5 PRESIDING JUDGE: Mr Taylor, just before you are asked
6 further questions, I'll remind you that you are still bound by
7 your oath to tell the truth.

8 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

9 [On former affirmation]

12:08:46 10 CROSS-EXAMINATION BY MR KOUMJIAN: [Continued]

11 Q. Good morning, Mr Taylor.

12 A. Good morning, Mr Koumjian.

13 Q. Sir, I wish to remind you of some prior testimony that you
14 have given during your direct examination and the first passage
12:09:08 15 which I'll read to you comes from 11 August beginning at page
16 26498. I believe it starts at the last five lines.

17 MR KOUMJIAN: Your Honour, do you wish me to wait for a
18 signal that - before I proceed to read these passages?

19 PRESIDING JUDGE: We'll just wait to see if he's got them
12:09:34 20 first, Mr Koumjian.

21 MR KOUMJIAN: Just to repeat, it's 11 August, page 26498:

22 Q. Sir, you were asked by your counsel and this is I believe
23 five lines up from the bottom:

24 "Q. You left office which year?

12:10:20 25 A. No, no, '93. I'm talking - this thing got me so upset
26 - 2003, excuse me. Two years before I left office I was
27 accused of amassing billions so I put that back to 2001,
28 2002. Until today, recently as - as recent as a few months
29 back I heard the Chief Prosecutor of the Sierra Leone Court

1 talking about millions and billions. No one - no human
2 being from 2001 until now has ever come up and said, 'Here
3 is a bank account with a million dollars belonging to
4 Mr Taylor.' It is just hanging out there. That's all you
12:11:02 5 get."

6 Before I ask you any further questions, I want to refer to
7 you two other passages. The second is from 20 July, page 24837.
8 I'm going to begin on line 18 when it's ready.

9 PRESIDING JUDGE: I think it's ready now.

12:11:54 10 MR KOUMJIAN:

11 Q. Mr Taylor, on that line you said:

12 "Listen, there is something about - I've been using certain
13 terminologies and what I know, you know, the demonisation and
14 they make you look like you are some scum of the earth so they
12:12:08 15 can destroy you. Nonsense. Listen, I am a Pan-African
16 revolutionary and I have respect for myself. Look, all this
17 thing to try to make thee look like a scum in order - listen,
18 never. Not Charles Ghankay Taylor. This is all why we have seen
19 this and my record is clear. You know all this thing in the
12:12:28 20 public eye. Charles Taylor stole millions of dollars. He has
21 assets scattered around the world. The same lies and constructs
22 to make you appear worse than human until today and I sit in this
23 Hague today before these honourable judges and I challenge the
24 United Nations, I challenge any human being or organisation in
12:12:52 25 this world - I mean on this planet to bring one bank account that
26 Charles Taylor has money in. They continue to lie. I have heard
27 the Prosecutor blatantly lie saying we found millions. Bring the
28 millions here. Please, today, if you have any. If there is any
29 bank anywhere in the world, in Europe, Switzerland, wherever,

1 that has an account - a numbered account for Charles Taylor or
2 anyone associated with me that brought money to you, I urge you
3 today to come forward here in this Europe and bring it. If
4 anyone anywhere on the planet knows of a building or any property
12:13:37 5 in Europe or the United States, please, you're authorised to come
6 forward today. They can hear it throughout the world. This lie
7 about Taylor. I'm supposed to be such a scumbag that people
8 bring me diamonds and nothing but a mayonnaise jar. How much
9 more can they demonise me? How much more? I challenge them
12:14:02 10 today to bring any evidence. It's a lie. Never brought me any
11 diamonds in nothing just as there are no bank accounts anywhere
12 in the world. I will tell anybody, if a bank account is found
13 anywhere in the world that has any money belonging to Charles
14 Taylor, then Charles Taylor has lied. His whole life is a lie."

12:14:27 15 The next passage I wish to read to you is from 3 August.
16 It begins on page 25847, line 3. Your counsel had been reading
17 from a speech you gave in France in November 1998 that was on
18 page 142 of the presidential papers, but the question begins on
19 line 3, page 25847, 3 August. On 3 August, your counsel asked
12:15:10 20 you:

21 "Q. ... Pause there. Let's confront that too, Mr Taylor.
22 The popular image of you is of someone running a country
23 and lining your pocket in the process; that you were
24 involved in a little personal enterprise. What do you say
12:15:24 25 about that?

26 A. I would say that is total falsehood and total nonsense.
27 Look, we are in a court of law. I have heard these
28 accusations before. Taylor is supposed to have robbed the
29 Liberian treasury dry and Taylor - I can still remember I

1 was by this time in Nigeria and the Gyude Bryant who led
2 the transitional government, the name is on the record, was
3 at a donors conference in Washington DC and the former
4 Secretary of State of the United States, a very good man,
12:16:06 5 Colin Powell, in describing me or my activities at that
6 time said that he has assets scattered around the world.
7 We have since heard about Taylor with billions. How long
8 has it been?

9 The issue of money, having it or not having it, is about
10 ten years old now. I was still President of Liberia when I
11 was accused of amassing billions. I went on the national
12 radio and I announced to the Liberian people - I said to
13 them if any human on this planet earth goes to any bank
14 anywhere in the world and brings one bank account of
12:16:47 15 \$100,000 belonging to Charles Taylor, I said I will resign
16 the office of President. It's been ten years.

17 I've heard the United Nations has passed asset freeze, all
18 these things. All these asset freeze, what bank accounts
19 have the United Nations ever come up with and said, oh,
12:17:08 20 guess what, here is a former bank account of Charles Taylor
21 or here is what is in it.

22 You know, we're in this Court in Europe and this may be the
23 only time I may have to really - for the world to hear from
24 me. This situation in the world where people just get up
12:17:31 25 and make up things, unsubstantiated allegations. You'll
26 just hear it one day, boom, Mr Taylor is this. And you
27 will be working for the rest of your life trying to
28 straighten it up and it never gets straightened up. Nobody
29 ever brings factual evidence, but it is repeated and

1 repeated and repeated until people - it begins to sound
2 like it's true.

3 I have heard the Chief Prosecutor of this Court talk about
4 monies of Taylor. I challenge him again here today in this
12:18:03 5 Court that he is Chief Prosecutor, bring one bank account.
6 Bring any evidence from any financial institution. There
7 is none. Let the gentleman come forward and say, 'Well,
8 here is an account belonging to Charles Taylor. He had it,
9 but even he closed it years ago'. Bring anything."

12:18:29 10 Do you recall - Mr Taylor, do you believe that I've read
11 accurately from your testimony?

12 A. Very much so. Yes, I do.

13 Q. Sir, when you told the Liberian people that if anyone found
14 an account with \$100,000 in it you would resign, when was that?

12:18:44 15 A. Oh, that was back at - I will put it to what? 2000. I
16 will put it to thereabout.

17 Q. Sir, when you were President were you referred to as "His
18 Excellency" at times?

19 A. Yes.

12:19:08 20 Q. And in correspondence was that sometimes abbreviated by the
21 initials "HE"?

22 A. Yes.

23 Q. Were you ever addressed then as "HE Charles G Taylor"?

24 A. No, they would not just say - they would just say "His
12:19:33 25 Excellency Charles G Taylor" in addressing me.

26 Q. When you were President would your business address have
27 been the Executive Mansion?

28 A. Yes. If I had a business the address would be at the
29 Executive Mansion.

1 Q. Sir, you were President of Liberia at that time, correct?

2 A. That is correct.

3 Q. And what was the address of your office as President of
4 Liberia?

12:19:54 5 A. The Executive Mansion.

6 Q. You lived at that residence that was named White Flower at
7 that time, correct?

8 A. No.

9 Q. During the time you were President - during times when you
12:20:06 10 were President did you live at a residence called White Flower
11 that was in Congo Town?

12 A. Yes.

13 Q. Mr Taylor, you did have a bank account at the Liberian Bank
14 For Development and Investment, isn't that true?

12:20:20 15 A. That is not true.

16 Q. In your name, correct?

17 A. That is not true.

18 Q. And this was a personal chequing account. Is that correct?

19 A. That is not correct.

12:20:34 20 MR KOUMJIAN: Your Honours, I would like to show the first
21 document in the bundle that was distributed last Wednesday to
22 Mr Taylor. The document at tab 1.

23 PRESIDING JUDGE: I think we should see those documents as
24 well. We don't have them.

12:20:56 25 MR KOUMJIAN: They are being distributed now. I'll
26 distribute the packets now.

27 MR GRIFFITHS: Can I indicate, Mr President, your Honours,
28 that so far as this disclosure bundle is concerned, before my
29 I earned friend refers to the document behind divider 14 there is

1 a matter of law that I would like to raise in relation to that.

2 MR KOUMJIAN: Yes, that's understood and I will be sure to
3 alert counsel before I get to that document:

4 Q. Mr Taylor, I'm directing your attention to the document at
12:22:41 5 tab 1. We see that it's labelled Liberian Bank For Development
6 and Investment, Monrovia, Liberia, new account application. It
7 then states names number 1, and there's only a number 1, Charles
8 G Taylor. Home address, Congo Town. Business address, Executive
9 Mansion. Looking down the form there are several blank boxes and
12:23:22 10 then it states initial deposit, US \$1,000. Next below that is an
11 applicant signature and then the date 8 December 1999.

12 Mr Taylor, do you recognise your signature as being the signature
13 in the box for applicant signature?

14 A. That is correct. That is me.

12:23:50 15 MR KOUMJIAN: I believe the microphone is not activated for
16 Mr Taylor.

17 THE WITNESS: Oh, I'm sorry. That is correct. It is my
18 signature.

19 MR KOUMJIAN:

12:23:58 20 Q. Let's go to tab 2. Just as a way of explanation, we have a
21 poor copy of what appears to be a signature card and then a
22 better copy of what appears to be the same card with another --

23 JUDGE SEBUTINDE: Mr Koumjian, before you go on to another
24 tab or another document, I haven't quite understood from the
12:24:29 25 records what is this document that we've just looked at? What is
26 it?

27 MR KOUMJIAN: This is a new account application at the
28 Liberian Bank of Development and Investment and I would also note
29 it shows an initial deposit of \$1,000, it's dated 8 December 1999

1 and at the bottom is written in hand a number. It says C/A
2 number 32851-01.

12:25:05 3 JUDGE SEBUTINDE: And does Mr Taylor agree with your
4 statements of the evidence? Is this Mr Taylor's evidence or is
5 this your interpretation of the document? In other words, have
6 you put this to the accused? Because I'm reading it. I don't
7 know - where it says C/A number and then a number. I don't know
8 what that is. Is that part of the record or is that something
9 someone added?

12:25:26 10 MR KOUMJIAN: Your Honour, I will get to that later - the
11 significance of that number later in my examination. I think it
12 will be clearer than asking Mr Taylor now. What I have simply
13 asked him is whether he recognises his signature on the form
14 that's stated as a new account application. But could I ask that
15 the document be marked for identification at this time?

12:25:48 16 PRESIDING JUDGE: Madam Court Manager, do you have an MFI
17 number there?

18 MS IRURA: Your Honour, it would be MFI-305.

12:26:05 19 PRESIDING JUDGE: Thank you. That document is marked for
20 identification MFI-305.

21 MR KOUMJIAN: If Mr Taylor could please be shown the
22 documents behind tab 2:

23 Q. Perhaps Mr Taylor to deal with - to properly address the
24 Justice's concern, do you have any comment to make about what
12:26:36 25 this document I just showed you behind tab 1, MFI-305, what that
26 is?

27 A. Well, this is going to take a little bit of time but I'll
28 go through it. The document, your Honours, behind tab 1 is only
29 the smallest part of the issue dealing with this bank account.

1 I'm waiting for Mr Koumjian to go further because looking at that
2 document it really doesn't say anything. That is my signature.
3 But the full document, I'm sure he will come to it as we go a
4 little further. I recognise my signature on that document. That
12:27:16 5 document is only part of the entire puzzle that he is trying to
6 impeach that I did not have a bank account, which I did not have
7 a personal bank account. But as we go further we will see that,
8 so I will give him an opportunity to go further.

9 Q. Thank you. Let's do exactly what you suggest, Mr Taylor,
12:27:35 10 and put the puzzle together and then we'll get your comments.
11 Behind tab 2 there is a photocopy of an LBDI chequing account
12 signature card. It's a very poor quality. The same card then
13 appears on the bottom with another card on the second page, just
14 to explain why it's repeated, just because of the quality.

12:28:01 15 A. That is correct.

16 Q. Sir, first of all, we see - so let's use the second page
17 which is the better copy.

18 A. Yes.

19 Q. We see at the bottom half something that says Liberian Bank
12:28:20 20 For Development and Investment, LBDI, chequing account signature
21 card. The account title, Charles G Taylor. The account number
22 00201-32851-01. It then has printed Charles G Taylor and a
23 specimen signature. Sir, is that your signature?

24 A. That is my signature.

12:28:51 25 Q. And the printing by the way, is that your printing for
26 Charles G Taylor?

27 A. That is correct.

28 Q. It's dated 8 December 1999. Do you agree?

29 A. I do agree.

1 Q. Now, above this on the same page appears to be another
2 card. The account number is the same. The account title is
3 different only in that it states HE Charles G Taylor. And the
4 authorised signature printed is "Kaddi eyatu Darrah". First of
12:29:27 5 all, Mr Taylor, of course is this the Kadiatu Diarra that has
6 previously been mentioned in your testimony?

7 A. That is correct.

8 Q. She was your special assistant. Is that correct?

9 A. That is correct.

12:29:36 10 Q. Do you recognise her signature in the line for the specimen
11 signature?

12 A. Yes, I do.

13 Q. And it is dated 15 December 1999, one week after your
14 signature, correct?

12:29:50 15 A. That is correct.

16 Q. Now, Mr Taylor, I would like to go to tab - perhaps the
17 two-page document can be given the next MFI number, which I
18 believe would be 306.

19 PRESIDING JUDGE: We'll mark the first document referred to
12:30:30 20 which is a fairly illegible copy of an LBDI chequing account
21 signature card, that will be MFI-306A and the second document
22 that's just been referred to is MFI-306B.

23 MR KOUMJIAN:

24 Q. Perhaps before we leave these, Mr Taylor, if we could just
12:31:00 25 note that the account number listed on these signature cards, the
26 last seven digits, that is 3285101, is what was written on the
27 bottom of MFI-305, the new account application, what was
28 handwritten. Now if Mr Taylor could be shown tab 4. Sir, tell
29 me when you're ready?

1 A. I'm ready.

2 Q. Sir, we see that this document is entitled the Liberian
3 Bank For Development and Investment with an address in Monrovia,
4 Liberia, debit ticket. The date which is handwritten appears to
12:32:05 5 me to be 7/18/00. And there's remark under a box called debit,
6 RAD 211112. Then it states offset credit, in the next box to the
7 right Charles G Taylor and then there's a number 0020132851-01.
8 The details are a little difficult to read. I'll do my best and
9 if you disagree with how I'm reading the handwriting please

12:32:55 10 correct me. Actually I cannot make out the first word. "Basing"
11 or something like that?

12 A. I can't help I think.

13 Q. RAD?

14 A. Yes.

12:33:07 15 Q. Then REF number. And then it appears to be C0001991535601.
16 Then it says - the letters appear to me to be INDGOLB/0. Those
17 are three separate words or three separate groupings of initials.
18 Natura Holdings and PTE Limited?

19 A. I agree.

12:33:49 20 Q. As per - and I cannot make out that word - W/LD, 7/17/00,
21 and then handwritten, one million, nine hundred, ninety nine
22 thousand, nine hundred seventy-five dollars. Then we see amount
23 in figures, US dollars, this is in numerals, \$1,999,975. Do you
24 believe I've read this correctly?

12:34:40 25 A. Yes. I will say yes.

26 Q. Sir, Natura Holdings --

27 JUDGE SEBUTINDE: Mr Koumjian, I for one would like to hear
28 from the accused. If he knows this document, if he could read
29 out to us, because obviously some words you couldn't read. So

1 when he says, "Yes, you've read it correctly," I would like a
2 clearer reading of this document. I can't read this document and
3 I'm not satisfied with the way you've gap read it, but if the
4 accused can give us a better reading of this document, I think I
12:35:10 5 would do with that. If he can't, that's a different story.

6 Mr Taylor, could you please read for us this document, if
7 you can?

8 THE WITNESS: Yes. To the best of my ability, because this
9 is not my handwriting, but I'll read it. This is a debit ticket
12:35:31 10 dated July 18, 2000. You have offset credit and that box reads,
11 Government of Liberia, GOL. That's what GOL means, Government of
12 Liberia-00-201-32851-01. To the left a debit box has RAD 211112.
13 Now, I too cannot make out the first word. That's RAD or RAD,
14 reference number C0001991535601 IMD - GOL, Government of Liberia,
12:36:32 15 B/O Natura Holding and PTE Limited as per copy - I can't make out
16 that - 17 - I mean 7/17/2000, one million, nine hundred ninety
17 nine thousand, nine hundred and seventy-five dollars, in words.
18 And the numbers in the box below, amount in figures, United
19 States dollars, \$1,999,975.

12:37:12 20 MR KOUMJIAN:

21 Q. Mr Taylor, Natura Holdings is a business familiar to you,
22 correct?

23 A. That is correct.

24 Q. And that is, correct me if I am wrong, owned by or was
12:37:21 25 partially owned by Guus Kouwenhoven. Is that right?

26 A. That is correct.

27 Q. That business was engaged in the timber business in
28 Liberia, correct?

29 A. That is correct.

1 Q. Now, Mr Taylor, you recall telling us in your testimony
2 that all funds received from businesses in the timber business in
3 Liberia must, by law, be deposited into the Central Bank?

4 A. No, I said revenues. I did not say all timber, because I
12:37:56 5 told this Court that there were accounts that were set up that
6 timber money did go into and I can give the reference. On
7 December 1 in this Court I mentioned to this Court, page 32804, I
8 mentioned Guus and monies being deposited in a special
9 operational account. So I have told the Court that monies did go
12:38:29 10 into an operational account and this is the account.

11 Q. Sir, let's go to MFI-193. If that could be shown --

12 JUDGE DOHERTY: Before you move from that document,
13 Mr Koumjian --

14 Mr Taylor, you have read the box stating offset, brackets,
12:38:46 15 credit, brackets, and you read it as Government of Sierra Leone,
16 GOL.

17 THE WITNESS: No, I said Government of Liberia.

18 JUDGE DOHERTY: Of Liberia, my mistake. Apologies. But to
19 my reading, there appears to me to be a line through GOL and an
12:39:01 20 initial at the side and a name above that.

21 THE WITNESS: The name above that is Charles Taylor. That
22 is an initial, okay, and the initial, apparently by signing,
23 that's how it got crossed. But GOL is there and GOL is repeated.

24 Now, we're about to move, your Honour. I have not answered
12:39:27 25 the Prosecution's - I had said before that exhibit behind number
26 1, 2 and 3, that after the Prosecutor exhibited them, then I will
27 answer his question regarding what really this is, because the
28 picture that he has given is not the full picture. So if I may
29 be permitted now to answer his question.

1 MR KOUMJIAN:

2 Q. Mr Taylor, why don't you go ahead and tell me what you want
3 to say about this deposit into your account at LBDI.

4 A. Well --

12:40:07 5 JUDGE SEBUTINDE: Which deposit? Which of the documents?

6 MR KOUMJIAN: The debit ticket behind tab 4:

7 Q. Do you want to talk now, Mr Taylor, or would you like me to
8 go through the rest of the --

9 A. Yes. It's very important, your Honours, these are
10 financial documents that will take our time because what the
11 Prosecution seeks to impeach is the fact that I said I had no
12 personal account and I had no personal account. If you look
13 behind divider 2 in that bundle that he gave, that he has

14 exhibited and marked, you will see there, your Honours, that
12:40:52 15 Kadiatu Diarra and Charles Taylor have the same bank account.
16 This account, if you look at the first - at the top of the page
17 where Kadiatu Diarra signs, the account number is the same,
18 201-32851-01. If you look at the bottom of that page, you will
19 see my signature on a signature card that gives - that is signed
12:41:20 20 on December 8. It's the same account number 201-32851-01.

21 Now, what does that tell us? This account is a Government
22 of Liberia account. I am a signatory to that account. Kadiatu
23 is a signatory. If your Honours look at the top of that page, as
24 you come below Kadiatu Diarra's name, you will see number,
12:41:56 25 combinations of signatures required. I'm not sure if I can - if
26 I can better go on this thing.

27 PRESIDING JUDGE: We can see it clearly, Mr Taylor.

28 THE WITNESS: Okay. Very good. You see there,
29 your Honour, it says "anyone". "Anyone". There are two

1 signatures on this account. Any one of the two. It is an
2 operational account being operated by the Government of Liberia.
3 It is not mine. So when you go now behind divider number 4 and
4 you look at the deposit from Natura, and the Prosecution has
12:42:34 5 exhibited documents that showed that that deposit went through
6 the Finance Ministry. In their bundle that they gave, you will
7 see that in that box it states Government of Liberia on line 1.
8 As we're going through, it further indicates for the second time
9 GOL means Government of Liberia. It is not my personal account.
12:42:56 10 Never was and never will be.

11 So that's what I wanted to bring into focus. That's why
12 even on the deposit it is stated Government of Liberia.

13 MR KOUMJIAN:

14 Q. Mr Taylor, in fact, the account is entitled only in your
12:43:13 15 name, Charles G Taylor, correct?

16 A. No, that is not correct.

17 Q. Let's go back, sir, to the first document behind tab 1, the
18 new account application. Now, we've already pointed out what the
19 names are on the account, one name, Charles G Taylor. But let's
12:43:35 20 look at the box that states type of account requested, check one.

21 And we see an X next to the third line down. "United States
22 dollars personal chequing account." Is that correct, Mr Taylor?

23 A. That is correct. So what's the question?

24 Q. Sir, let's look at some testimony you gave on 26 August at
12:44:13 25 page 27448, beginning at line 17. Again, that's 26 August 2009,
26 page 27448, line 17. And at that time I believe - actually, your
27 counsel is reading from MFI-193. And I'm sorry I don't have the
28 page reference within the MFI, but from the transcript he read:

29 "It is important to clarify" --

1 PRESIDING JUDGE: I don't think that transcript is in front
2 of you yet.

3 THE WITNESS: Not yet. I'm sure it will come up,
4 your Honour.

12:45:06 5 MR KOUMJIAN: It's 26 August, 27448.

6 MS IRURA: Your Honour, that page does not correspond to
7 that transcript.

8 MR KOUMJIAN: I'll come back to that later then.

9 Thank you:

12:45:34 10 Q. Sir, let's look at another document concerning this
11 account, and that would be behind tab 5. It is entitled
12 "Statement of Account". I'll wait until everyone has it.

13 PRESIDING JUDGE: I think everybody has tab 5 in front of
14 them.

12:46:13 15 MR KOUMJIAN:

16 Q. It's entitled "Statement of Account Liberian Bank For
17 Development and Investment" and it gives the address. It then
18 gives the accounts number. I won't repeat it. We've read it
19 before. The name, Taylor, Charles G. US dollar chequing
12:46:30 20 accounts personal. Mr Taylor, if this account belonged to the
21 Government of Liberia, why is it in your name as your personal
22 account?

23 A. Very, very clear. I've explained this and I'm sure these
24 financial records will be understood. Mr Koumjian, this account
12:46:53 25 is opened by the President on authorisation and countersigned -
26 Kadiatu Diarra is not my wife. She is not my lover. She works
27 for the Government of Liberia. The only reason why she is
28 signing and is capable of signing, that's what that form said,
29 anyone that is capable of signing that, because she's acting on

1 behalf of her government under instructions. That's the only
2 reason why she is on this account. So the fact that it says here
3 - this, your Honour, is a covert account opened up by the
4 Government of Liberia during this period, and I've gone through
12:47:36 5 this and you will get to see where the Government of Liberia is
6 finding means, okay, to purchase arms and ammunition to fight our
7 war after we have informed the United Nations. And so there's a
8 government official - it has to be opened in my name as President
9 Charles Taylor, but it is operated by a government official for
12:48:01 10 the purpose intended as a covert account. That's why those two
11 accounts. So the fact that it says here United States dollars or
12 chequing, the documents will show monies going into that account
13 as Government of Liberia - is shown as Government of Liberia and
14 there's another official that has a single signature that can
12:48:23 15 operate this account. That is not my wife, that is not my lover
16 or anything but an employee of the Government of Liberia. That's
17 why it is covert. That's why it states this way.

18 Q. Mr Taylor, Kadiatu Diarra was your loyal personal
19 assistant, correct?

12:48:39 20 A. No, no, no. Kadiatu Diarra worked for the Government of
21 Liberia as my personal assistant. To just say "your loyal", she
22 did not work in the private capacity, no. She was Assistant
23 Minister of State for Presidential Affairs and special assistant
24 to the President.

12:49:00 25 Q. Sir, are you telling the Court that this was a covert
26 account set up in your name?

27 A. It is not just set up in my name. It is set up in two
28 names, Mr Koumjian. That's what I'm telling this Court.

29 Q. The title of the account, sir, is Charles G Taylor.

1 Kadiatu Diarra is listed as an authorised signatory. The title
2 of the account, sir, is not Kadiatu Diarra, it's Charles G
3 Taylor, correct?

12:49:30 4 A. It doesn't really matter. The bank did not require that
5 the two titles be put there. What the bank required are the
6 authorised individuals to operate that account.

7 Q. So, Mr Taylor, to keep this account secret, because you
8 were expending government revenue on secret causes, you put it in
9 the name of the President?

12:49:46 10 A. No, no, no, no. You got it wrong. The secrecy had nothing
11 to do with the government and legislature of Liberia because the
12 legislature had authorised the President to do anything necessary
13 to secure the country. The secrecy had to do with dealing with
14 the international community. It was personal and once it was not
12:50:09 15 coming out of a government account it could not be blocked, it
16 was a personal account so it could not be blocked.

17 Q. You believe that accounts cannot be blocked?

18 A. No, excuse me, Mr Koumjian. As far as I understand, your
19 Honours, I would answer Mr Koumjian's question. Mr Koumjian
12:50:26 20 seeks to tell this Court --

21 MR KOUMJIAN: Your Honour, could the witness pleased be
22 asked to answer the question.

23 THE WITNESS: I'm referring to the judges now, please. I'm
24 referring to the judges. I'm referring to the judges. The issue
12:50:39 25 at question you are questioning me on here as to whether this
26 account is my personal account or a government account, I'm
27 saying it's a government account. Now go ahead with your
28 questions.

29 PRESIDING JUDGE: I think you are both talking about two

1 different things. Mr Taylor is referring to blocked in a
2 different sense than you are referring to it, Mr Koumjian, so I
3 think you ought to rephrase your question.

4 MR KOUMJIAN:

12:51:02 5 Q. My question, sir, is you said it was personal and once it
6 was not coming out of a government account it could not be
7 blocked. It was a personal account, so it could not be blocked.
8 What are you talking about there?

9 A. Mr Koumjian, the United Nations imposed an arms embargo on
12:51:30 10 Liberia. Any transfer from this account for the purchase of arms
11 would have been stopped because the clearing for all of the money
12 coming out of LBDI went through New York, Citibank. So it was
13 impossible. So if money is coming out of this account being paid
14 on a personal level the United Nations will not know that what it
12:51:49 15 is going for and it is none of their concern, but the Government
16 of Liberia it would be a different concern because New York
17 served as a clearing house for LBDI.

18 Q. So to hide the account that this was government money you
19 put it in the name of the President of the country. Is that what
12:52:08 20 you are telling us?

21 A. With the authorisation of the legislature, yes, that is
22 exactly what I'm saying.

23 Q. Mr Taylor, you said this was a covert account to buy arms,
24 correct?

12:52:19 25 A. No.

26 Q. Yes, sir, you did. Do you want me to find the line?

27 A. This covert account was used to buy arms, but that's not
28 the only reason why it was used. It was used to buy arms but let
29 me clear it's not the only reason why it was used.

1 Q. Well, sir, first of all which arms did you buy using money
2 from this account?

3 A. Well, in 2001 we expended monies from this account to help
4 pay for the arms that we were getting from Serbia in 2001.

12:52:50 5 Q. Who did you transfer the money to?

6 A. We did not transfer. It was taken out and paid in cash.

7 Q. Sir, let's go back to the document behind tab 5.

8 A. 5?

9 Q. Yes.

12:53:14 10 A. Yes, we are there.

11 Q. And let's look, so we understand it, again this is the
12 document that shows that this is an account in the name of
13 Taylor, Charles G, US dollar chequing accounts, personal. It
14 then lists various dates in July 2000 and has transactions record
15 of debits and credits. Now we see a credit in what appears next
16 to the number 12 down, I believe, seven lines. I'll read exactly
17 what I read from that line: 18 and then the next column 20856.

12:53:34 18 The next column the letters RAD as in David, then INO, then CGT
19 initials with periods after each, B/O Natura HOL. There we see
12:54:18 20 in the credit column 1,999,975. Sir, this was a deposit from
21 Guus Kouwenhoven into this account in your name at the Liberian
22 Bank For Development and Investment, correct?

23 A. No, you are trying to - you are trying to mislead this
24 Court as you are speaking, Mr Koumjian. I'm sorry. Let's look
12:54:47 25 at that document. This is a financial document and we ought to
26 take our time and look at it. Let's first go back to your
27 Charles Taylor. The account number, your Honours, 32851 is the
28 same account that we're referring to with the two signatures of
29 myself and Kadiatu Diarra. If you look at the statement of that

1 account, that statement is the statement that covers the period 1
2 July 2000 through 31 July 2000. Again I'm sure your Honours are
3 following this. If not I could point it out on the stuff.

4 So if you look back at what Mr Koumjian is talking about,
12:55:29 5 this 1 million 999 is the same document that he showed behind
6 divider number 4 that shows the 1,999,000 deposited under what I
7 say the government of - I mean of Liberia. So this is the same
8 period that is being reflected here. There's not a separate
9 amount. This is the amount from Natura and if we look at behind
12:55:54 10 exhibit 4, Natura there states that this is a GOL deposit.
11 That's what he is reflecting on this page. I don't know if we
12 agree.

13 Q. Mr Taylor --

14 A. So I need to probably.

12:56:09 15 JUDGE SEBUTINDE: Mr Taylor, on issue of Natura investments
16 and the document I think behind divider 4 this was precisely the
17 point that Justice Doherty was trying to say before. The words
18 GOL have been deleted and been replaced by the words Charles G
19 Taylor. Now, this is the account to be credited.

12:56:38 20 THE WITNESS: No, your Honour. Let me point out to you
21 it's not deleted. Look down. If you look down on the line you
22 still see GOL being mentioned. If you come down on the first
23 line of the details GOL is mentioned there again, okay. What we
24 are saying there is that's an initial, okay, I do not know how
12:56:57 25 that - but look down on the details, it still says GOL right
26 there. GOL.

27 JUDGE SEBUTINDE: Yes, I've seen the second GOL. But I
28 think perhaps we're arguing at cross-purposes here. The monies
29 reflected behind divider 4 were debited from the Natura Holdings

1 account.

2 THE WITNESS: That is correct.

3 JUDGE SEBUTINDE: And credited on the account in your
4 names, the account number --

12:57:35 5 THE WITNESS: 32 --

6 JUDGE SEBUTINDE: Yes.

7 THE WITNESS: 851, yes.

8 JUDGE SEBUTINDE: Which account you say is a Government of
9 Liberia account but in your names.

12:57:46 10 THE WITNESS: This is the same Government of Liberia - yes,
11 your Honour, that is co-signed again by the second government
12 official. It's the same account, they are not two accounts.

13 JUDGE SEBUTINDE: Did you say co-signed or --

14 THE WITNESS: Yes, if you look, Kadiatu Diarra behind
12:58:05 15 divider number 2 signs the same account and any one of us can
16 withdraw from this account. You see where it says anyone. It's
17 the same account that the Kadiatu Diarra signs. That's why I'm
18 insisting it's not my personal account.

19 JUDGE SEBUTINDE: Even though there is the word "personal"
12:58:23 20 you're saying it's not a personal account.

21 THE WITNESS: No, no, no, it's not. You have personal
22 accounts, you have chequing accounts. The way the account is
23 opened there's no other nomenclature that the bank uses except
24 those categories, personal accounts, chequing accounts, and it
12:58:43 25 does not say joint, you know, account like that but that's why
26 she comes and she signs, because this, if you see, she signs a
27 week later because all of these technicalities are worked out.

28 MR KOUMJIAN: If the witness could be shown the transcript
29 for 26 August. I have the correct reference. I apologise, I had

1 one digit wrong. It's page 27748, line 17. 26 August, 27748:

2 Q. Do you recall, Mr Taylor, your counsel was reading to you
3 from MFI-193, the preliminary response of the Government of
4 Liberia to report of panel of experts and at line 17 he read:

12:59:51 5 "It is important to clarify that each logging company
6 operating in Liberia is a signatory to a standardised concession
7 agreement. The concessionaire's obligations are detailed in the
8 agreement and each is required by law to pay all taxes directly
9 into the central government revenue depository maintained by the
13:00:25 10 Ministry of Finance, the statutory agency empowered to assess,
11 receive and collect taxes."

12 So, Mr Taylor, given that that is the law that all
13 deposits, revenues, have to go to the Central Bank, why is this
14 almost \$2 million going into an account - personal chequing
13:00:48 15 account in the name of Charles G Taylor?

16 A. Well then again, Mr Koumjian, based on your documents that
17 you have presented here, and I will have to go through it because
18 I have gone through it since you gave it to me, you see that the
19 Finance Ministry you see the transmittal from the Finance
13:01:11 20 Ministry that you presented amongst your documents. That the
21 Finance Ministry is involved in this and that's how it goes on to
22 the bank. I would have to go through this to find it again, but
23 you presented it over the weekend to me.

24 Q. So, sir, you are saying that this deposit directly into
13:01:24 25 your account violated the law that all revenue must go to the
26 Central Bank?

27 A. It did not violate the law. This was - this involved an
28 operation with the Ministry of Finance and that's why I'm saying
29 the document that you have presented in this folder shows that

1 the Ministry of Finance was involved. So to ask me that I think
2 is unreasonable because you know the Finance Ministry is
3 involved.

13:01:52 4 Q. Sir, let's go to talk about - you mentioned Citibank
5 records and you said you used this account to pay for arms
6 through Citibank?

7 A. No, I did not say that.

8 Q. Okay, please explain. If I misquoted you, please correct
9 me.

13:02:02 10 A. No.

11 Q. What did you say about the use of Citibank?

12 A. Mr Koumjian, Mr Koumjian, I did not say that I used
13 Citibank to pay - to buy arms. I never said that. Let's get
14 that straight.

13:02:15 15 Q. What did you say about Citibank, sir?

16 A. Well then you ask me. What is your question?

17 Q. My question is this morning you said you mentioned that you
18 used Citibank and this account?

19 A. No.

13:02:26 20 Q. What did you use Citibank for?

21 A. I did not. I said that LBDI used Citibank as their
22 clearing house. That's all I said about Citibank.

23 Q. Let's explain something because you've told us you have a
24 background as an economist and use some terminology - you used
13:02:51 25 the word clearing house. But is it correct that in order to
26 transfer money between Liberia and most banks around the world
27 there are intermediary financial institutions that are used in
28 order to make that transfer?

29 A. I would say yes.

1 Q. These are usually called correspondent banks?

2 A. That is correct, yes.

3 Q. And at this time in Liberia, Citibank in New York was a
4 correspondent bank for some Liberian banks including LBDI,
13:03:34 5 Liberian Bank For Development and Investment, correct?

6 A. To the best of my knowledge, yes, Citicorp served as a type
7 of clearing point, yes.

8 Q. Just so we understand an example of how that works, let's
9 look behind tab 6.

13:03:52 10 JUDGE DOHERTY: Is it Citicorp, C-O-R-P? I note two
11 things: First, the record itself and, secondly, we've had a
12 reference to Citibank.

13 THE WITNESS: Citibank, Citicorp, your Honour, it's the
14 same.

13:04:11 15 JUDGE DOHERTY: The same institution?

16 THE WITNESS: Yes. Citicorp, yeah.

17 MR KOUMJIAN:

18 Q. Mr Taylor, I want to use these two pages as an example to
19 show how correspondent banks are used to transfer money. And

13:04:26 20 these are two pages from the web page of the Association for the
21 Legal Defence of Charles G Taylor. The pages are entitled at the
22 top "How to Help". And we see - for example, we see there are
23 several financial institutions listed on these two pages, six in
24 total. But let's just look at the first page. We have Citibank
13:04:55 25 listed and it has a telex and a swift code, but it states "for
26 credit to Echo Bank" with an account number. For credit to an
27 account number for the Association for the Legal Defence of
28 Charles Taylor.

29 So just so we understand how this would work, would you

1 agree with me, Mr Taylor, that someone who wanted to give money
2 to this association would send it - could send it to Citibank
3 following these instructions and then from Citibank it would be
4 transferred into the account at Echo Bank the account number
13:05:35 5 given for the Association for the Legal Defence of Charles
6 Taylor?

7 A. I would say yes.

8 Q. Below that, just to use another example, is Deutsche Bank.
9 The same procedure would be used. Correct?

13:05:50 10 A. Yes.

11 Q. And then on the next page we see a bank in Paris and a bank
12 in Switzerland. Similar reasoning: These banks would have a
13 relationship with the Liberian bank that would allow money to be
14 transferred, correct?

13:06:05 15 A. Using these specific examples, yes.

16 Q. Just use that as an example. Now, I want to talk about the
17 Citibank - some Citibank records. Just so we know where they
18 come from, perhaps if we could look behind tab 7.

19 MR KOUMJIAN: I'm sorry, your Honour, could that last
13:06:37 20 document be marked for identification? I believe I missed one or
21 two. Tab 4 has not yet been marked. So I would ask first for an
22 MFI for tab 4.

23 PRESIDING JUDGE: Tab 4, the debit ticket, is marked for
24 identification MFI-307.

13:07:14 25 MR KOUMJIAN: And then the July statement of account, which
26 would be tab 5, it says Statement of Account, 1 July 2000 through
27 31 July 2000.

28 PRESIDING JUDGE: That will be marked for identification
29 MFI-308.

1 MR KOUMJIAN: Then the document we just were discussing,
2 the two-page document listing how to help with the listing of
3 correspondent banks, may that be marked next in order.

4 PRESIDING JUDGE: That last document is marked MFI-309.

13:08:09

5 MR KOUMJIAN:

6 Q. Now, Mr Taylor, when a bank has a relationship with a
7 correspondent bank, it actually will have an account. So, for
8 example, LBDI will have an account with Citibank that allows it
9 to transfer money between LBDI and other institutions that have a
10 relationship with Citibank, correct?

13:08:27

11 A. No. You are asking me now to testify almost as an
12 expert.

13 Q. If you don't know, just say you don't know.

14 A. I really don't know the details.

13:08:36

15 Q. Thank you. We see, just to make clear where documents came
16 from, behind tab 7, something dated May 19, 2004, the letterhead
17 from Citigroup Incorporated, 399 Park Avenue, New York, and it
18 indicates that documents - read it - "pursuant to the subpoena
19 described above, I am producing the enclosed documents on behalf
20 of Citibank."

13:09:04

21 On the next page we see that there's a Citibank address in
22 the top left and then it indicates this is a - "Dear Roslyn,
23 please find attached an update to the signature list for Liberian
24 Bank for Dev and Investment, account number 36006105." So
25 there's a specific account number given for the bank for LBDI.

13:09:39

26 Turn to the next page. We see handwritten on the right A/C
27 36006105. "Dear Mrs So, please find attached our most recent
28 list of authorized signatures for your records."

29 Then on the following page there's a list of signatures of

1 various bank officers. Perhaps if I could just ask if you
2 recognise, Mr Taylor, Francis Dennis as being the President of
3 LBDI in 1998.

4 A. Yes.

13:10:29 5 Q. Thank you. So, sir, I want to take a look at some
6 transactions. You've already mentioned that you've looked at
7 these. So let's go -

8 MR KOUMJIAN: Sorry. May that document, your Honour, be
9 marked for identification, the bundle - the several pages in tab
10 7?

11 PRESIDING JUDGE: We'll count that as one document.

12 MR KOUMJIAN: Yes, please.

13 PRESIDING JUDGE: MFI-310.

14 MR KOUMJIAN:

13:11:05 15 Q. Now, sir, going to tab 8, this appears to be a computer
16 printout and there appears to be a page number at the bottom
17 right, 2417. I want to refer you to the second to last
18 transaction - second to the bottom. But before I do that, let's
19 look at the top just so we're clear what we're looking at. This
13:11:32 20 report, the computer report, is dated August - dated 080100.

21 We're in North America as far as the date. Using the North
22 American dating convention, that would be August 1. The account
23 number is 36006105, the same account number we saw in the last
24 tab 7 for LBDI.

13:12:01 25 A. Uh-huh.

26 Q. It indicates - there's a date range from 701 to 731.
27 Appears to be 2000, 0-0. Now, sir, second to last transaction
28 dated 17 July 2000 shows the ordering party Natura Holdings PTE
29 Limited. Do you see that, sir?

1 A. Yes, I do.

2 Q. And it says "for further credit to". And above that
3 there's a - excuse me - account and then there's an account
4 number, 0020132851-01. And that is the same account number as
13:12:51 5 the account we looked at in tabs 1 and 2, the account in the name
6 of Charles G Taylor with LBDI, with the signature cards from you
7 and Kadiatu Diarra; is that correct?

8 A. Well, let's - well, let's get the picture. It doesn't -
9 why doesn't it say Charles G Taylor here? It's the same point
13:13:10 10 that you've been trying to make to this Court that because it
11 says Charles G Taylor and open, even though there's another
12 government official, it means that it's personal. Why doesn't it
13 say Charles Taylor here? Because what is the important is the
14 account number and the signatures. Whether you put jack rabbit
13:13:27 15 on it, but for these judges, it's good to explain - what is this
16 page, Mr Koumjian? This page that you've just asked me to
17 respond to, what is it?

18 Q. Sir, do you recognise this as the same amount of money,
19 \$1,999,975, that was transferred into the account at LBDI that we
13:13:52 20 just looked at with the debit ticket we looked at?

21 A. That was transferred to this account, yes. But I asked the
22 question because, important - you know, I don't know if everybody
23 here is financial and these judges too are just looking at this
24 document. This document is the - is an account page of the
13:14:13 25 Liberian Bank for Development and Investments. This is not an
26 account statement of the account that I have told these judges is
27 the account of - that is using the 325 something. This is a bank
28 statement, not a personal account statement. And the amount
29 shown here, your Honours, is the same amount that was - is behind

1 divider number 4 showing the deposit July 17, 2000.

2 Q. Although it's the same account number, 32851-01, you are
3 saying it's significant that it does not have your name on it?

4 A. It's not important. What is important in the bank, the
13:15:02 5 account numbers and the signatures to that account are important.
6 Names could change any time. That's why my name is not mentioned
7 here because it goes to an account.

8 Q. Sir, let's look at another transaction behind tab 9.

9 MR KOUMJIAN: First, may tab 8 be marked for

13:15:25 10 identification, your Honour?

11 PRESIDING JUDGE: Yes, that page is marked MFI-311.

12 MR KOUMJIAN:

13 Q. Sir, the information on the top of the printout is the
14 same, the page number is 2071. And then in the middle, I direct
13:15:45 15 your attention to a transaction dated 03/30, 2000. March 30,
16 2000. It gives a reference number, for the record I'll read it:
17 F06009000F8201. Details. Further credit to Charles G Taylor.

18 Account - AC 0020132851-01. There's another reference number -
19 other reference, DC0003300032. And we see the ordering party,
13:16:36 20 embassy of the ROC, Monrovia, Liberia. The amount that that
21 account, 3285101, further credit to Charles G Taylor, the amount
22 that was deposited was \$3,500,000. Now, Mr Taylor, tell the
23 judges about this money that you received from the embassy of the
24 ROC, Monrovia?

13:17:06 25 A. What do you want me to tell them?

26 Q. Do you acknowledge that you received \$3.5 million to the
27 account in your name that we've been talking about at LBDI --

28 A. I.

29 Q. -- on March - please let me finish and I'll let you --

1 A. Go ahead.

2 Q. -- on March 30, 2000? It may have been received the next
3 day at your bank.

4 A. That is correct. I acknowledge that \$3.5 million went into
13:17:33 5 this account. I acknowledge that.

6 Q. Mr Taylor, what was this money for?

7 A. That's why the account, I'm saying, is covert.

8 Q. But you've already told us about money that Taiwan - let's
9 clarify one thing. Embassy of the ROC, that's the embassy for
13:17:55 10 Taiwanese government in Monrovia, correct?

11 A. That is correct.

12 Q. And you've already told these judges that Taiwan was giving
13 about \$10 million in aid per year to Liberia. That was not
14 covert. That was open, correct?

13:18:08 15 A. That was open, that is correct.

16 Q. So why is \$3.5 million going into the personal chequing
17 account in the name of Charles G Taylor?

18 A. It is not my personal chequing account and if these judges
19 accept your interpretation then I guess that's it, but it is not
13:18:26 20 - if you are asking me why was this money going into this

21 account, I have said that this account was a government account
22 used and the monies going into there are covert monies to take
23 care of certain things. That's why it is done personally.

24 Q. Mr Taylor, I want to give you every chance to explain that.

13:18:46 25 Why when you've already told us about Taiwan openly giving money
26 to Liberia, why do you have to have Taiwan give \$3.5 million into
27 a covert account? Explain this to us?

28 A. Because it's covert. That's as simple. Because it's
29 covert.

1 Q. Why is it covert? Because it's going directly into your
2 pocket?

3 A. No, Mr Koumjian.

4 Q. Then why can't Taiwan simply give this to the Government of
13:19:12 5 Liberia openly, sir?

6 A. Mr Koumjian, I know we are going through this again and I
7 don't want us to go backward and forward. As far as I'm
8 concerned, if I'm understanding you properly, and I'll answer
9 your questions, you seek to impeach what you read to these judges
13:19:27 10 that in fact the account was not - it was not a government
11 account, it is a personal account. I think that's the issue. As
12 to the covert nature of the account, that's the responsibility of
13 the people of Liberia to determine as to whether money went into
14 my pocket or not and none of your business. My answer to you is
13:19:44 15 that the amount that went into this account was covert, it was
16 used covertly and I'm under no obligation to tell you what those
17 covert operations were.

18 Q. Sir, I'm going to ask you please tell us what are the
19 covert operations that you convinced Taiwan to fund with \$3.5
13:20:03 20 million?

21 A. I did not - the Government of Liberia was operating
22 covertly. I asked Taiwan for \$3.5 million. I was given 3 - I
23 mean the government was given \$3.5 million and it was used for
24 the purpose that we decided without the Taiwanese knowing what it
13:20:22 25 was used for.

26 Q. Why wasn't it just deposited into the Central Bank of
27 Liberia?

28 A. Because the Central Bank of Liberia operated directly with
29 the IMF and the World Bank. All deposits, all withdrawals that

1 went into the Central Bank was monitored by the IMF and World
2 Bank.

3 Q. Sir, this transaction is dated March 2000. What did you
4 need millions of dollars in covert funds for in March 2000?

13:20:56 5 A. We were accumulating money, Mr Koumjian. We were
6 accumulating money and in 2001 that's how we managed to pay for
7 the arms and ammunition that I have said that I ordered and it
8 was done in 2001. And these judges will see that that account
9 ends after this covert operation. It doesn't go any further.

13:21:16 10 Q. I'm sorry, explain that. Which account ends? Which
11 accounts ends, sir, after the covert operation?

12 A. 32851. You will see when it ends. It does not continue
13 until my presidency ends.

14 Q. We will continue. We'll look at this some more. Let's
13:21:33 15 look, sir - may that document, your Honour, labelled page 2071
16 with the \$3.5 million credit be marked for identification next in
17 order.

18 PRESIDING JUDGE: Yes, that's marked for identification
19 MFI-312.

13:21:57 20 MR KOUMJIAN:

21 Q. Let's look behind tab 10. Are you ready?

22 A. Yes, I am.

23 Q. Again this is a - it's labelled Liberian Bank For
24 Development and Investment and it states a few lines down that
13:22:26 25 this statement covers 1 August 2000 through 11 September 2000.
26 It has an account number 20132851-01. My copy at least appears
27 to be cut off but partially the last three letters of your name
28 LOR Charles G, chequing accounts, personal in the box at the top
29 left.

1 Now, sir, what I'm interested in this account - in this
2 document is to go to the box that's at the bottom of the second
3 page, account summaries. If we look at this, it appears to be a
4 monthly running total of debits and credits to the account. I
13:23:37 5 frankly cannot read or do not understand the very first line.
6 Something - it looks like a 03 to me. But that has a minimum
7 balance minus 110 and no credit amount. But then we look at the
8 next entry, 1999/12, and we see an ending balance of 17,000. If
9 we then go to the month of March where we were just looking at
13:24:10 10 the Taiwan transaction we see 2000/03, we see debits, money taken
11 out of the account, \$4,722,370.48. Then we see credits into the
12 account, \$6,905,500.

13 So first, Mr Taylor, while we've already seen that you had
14 a \$3.5 million deposit from the embassy of Taiwan in that month,
13:24:54 15 how do you account for the other almost 3.5 million, \$3.4 million
16 in deposits received in March 2000?

17 A. Well, in the first place, Mr Koumjian, you see this is why
18 sometimes I wonder about what you have been doing. What is this
19 statement that you have just read? You are trying to tell these
13:25:17 20 judges that this statement is a part of page 1 ending in page 2.
21 Totally misleading this Court. Totally misleading this Court.

22 On these two pages are two separate and distinct
23 statements, your Honours. So this second part, what's the origin
24 of this second document that you are bringing here? You want
13:25:38 25 these judges to believe that this second part is a part of
26 account 32851? Is that what you are trying to tell them, which
27 would be misleading? What is this second document that you are
28 asking me about?

29 Q. Sir, this is the second page of the account statement --

1 A. No.

2 Q. -- from 1 August 2000 through 11 September 2000?

3 A. That is not correct. Mr Koumjian, if I may help these
4 judges, on the second page where it says at the top closing
13:26:03 5 balance, that ends that statement, your Honour. And it would be
6 reflected on the next - in the next thing that he is going to
7 bring this balance is carried forward on another statement of
8 16,020. This statement at the bottom is a totally different,
9 different statement that has nothing to do with this account. It
13:26:23 10 has to do with the bank LBDI balance if which is so where is the
11 origin of this particular bottom part? This is nothing but a
12 paste. But the closing balance on that day is 16,020 in account
13 32851 and if you say anything different your accountant should
14 have told you it's wrong.

13:26:44 15 Q. Mr Taylor, in fact that closing balance that you are
16 talking about, \$16,020.16, is exactly what's reflected in the
17 very last line of the account summaries ending in September 2000;
18 \$16,020.16?

19 A. For a particular account. This summary has nothing to do
13:27:06 20 with that account. This is a bank summary. And there's no way
21 that it is attached to that. That's what I want these judges to
22 understand.

23 Q. Mr Taylor, in March - so I understand your testimony, are
24 you denying that in March 2000 in the LBDI account that we've
13:27:23 25 been talking about that has the account number 32851-01, that in
26 March 2000, six million nine hundred and some thousand dollars
27 were deposited into your account?

28 A. I cannot recall but if you have the deposit will you please
29 show me the statement of deposit. I cannot recall \$6 million

1 going into that. But if you have the financial statement amongst
2 the - show it to me, please.

3 Q. Is it possible that you would not recall over \$3 million
4 going into that account?

13:27:56 5 A. Mr Koumjian, I have answered. I have said I do not recall
6 but if you have the statement of account in these documents to
7 show that it happened I'll be glad to accept it. I do not
8 recall.

9 Q. This is my question, Mr Taylor: Did you have so much money
13:28:13 10 that \$3.4 million is something you could just forget? You
11 wouldn't know whether or not in March 2000 you had only 3.5 or if
12 you had had 6.9 million deposited into your account?

13 A. This is a very serious case. Let's stop joking.
14 Mr Koumjian, you people have told it to be cynical that way.
13:28:34 15 Let's stop joking with my life.

16 Q. Sir, I'm not joking.

17 A. You have told this Court --

18 Q. I am asking you to answer the question.

19 A. No, I am not going to fight with you. You know, to say you
13:28:40 20 have so much money.

21 JUDGE SEBUTINDE: Mr Koumjian, we want to be able to follow
22 what's going on.

23 MR KOUMJIAN: Of course.

24 JUDGE SEBUTINDE: We are looking at the page that has the
13:28:54 25 words "account summaries" and that seems to be what is in
26 question.

27 MR KOUMJIAN: Correct.

28 JUDGE SEBUTINDE: I have also seen the figure at the bottom
29 of that account summarise which is 16 million --

1 MR KOUMJIAN: 16,000.

2 JUDGE SEBUTINDE: 16,000. No, it is 16,020,16, isn't it?

3 MR KOUMJIAN: It's 16,000.

4 JUDGE SEBUTINDE: 16,000, okay. \$16,000 as the balance.

13:29:27 5 But also above that are some other figures. Now according to
6 Mr Taylor these are all figures reflecting different accounts -
7 different accounts, not relating to the same account. You are
8 saying that this summary is a summary of the one account.

9 MR KOUMJIAN: Yes, this is at the --

13:29:47 10 JUDGE SEBUTINDE: In the names of Mr Taylor.

11 MR KOUMJIAN: At the end of this period which is for
12 whatever reason 1 August to 11 September, at the end of each of
13 the statements that are given there appears to be a summary
14 monthly given in the account. If you look back at tab 5, you
13:30:07 15 will see there was a similar summary for that July statement.

16 JUDGE SEBUTINDE: Yes, but the trouble I personally am
17 having: One is that that summary is illegible for the most part
18 because I would have wanted for instance to see or to understand
19 what are the figures in the left most corner - the first column
13:30:32 20 of that account summary, I can read it. I don't know if it's a
21 year or a month or what it is. I don't know if it's account
22 numbers. Can you help?

23 MR KOUMJIAN: This is unfortunately the best copy that I
24 have but it appears to me that the M is cut off the word "month"
13:30:52 25 on the left. So this is - on the left-hand column is a month
26 going from at least the second one December '99, then January,
27 February, March, et cetera up through September 2000 and opening
28 balance is the second column. The minimum balance is given in
29 the third column. This is my interpretation. A maximum balance

1 in the fourth column. Then an amount that had been deducted
2 during the month, debit amount, in the fifth column. Then the
3 amounts of credits that went into the account that month in the
4 next column, credits. Then I believe it says then the number of
13:31:34 5 debits and credits but I have trouble reading - to be honest I
6 can't - it says number of debits and then the number sign of
7 credits and then the final column is the ending balance. So we
8 see, for example, in the month of March 2000 where there was the
9 Taiwan transaction for 3.5 million there appeared to have been
13:31:57 10 only two credits that month but the total credit amount was
11 \$6,905,500.

12 PRESIDING JUDGE: We will have to leave it there,
13 Mr Koumjian. We will take the lunch break and resume at 2.30.

14 [Lunch break taken at 1.31 p.m.]

14:30:23 15 [Upon resuming at 2.30 p.m.]

16 PRESIDING JUDGE: Go ahead, Mr Koumjian.

17 MR KOUMJIAN:

18 Q. Mr Taylor --

19 MR GRIFFITHS: Can I just mention a change in
14:33:42 20 representation, that, Mr President, our case manager,
21 Ms Moilanen, has left us.

22 PRESIDING JUDGE: All right. Thank you, Mr Griffiths.

23 MR KOUMJIAN:

24 Q. Mr Taylor, how much did you spend on arms that you obtained
14:33:56 25 from Serbia?

26 A. I can't be too sure, but in excess of about - I would say
27 between \$5 to \$7 million.

28 Q. How did you pay for that?

29 A. Cash.

1 Q. How was the cash obtained?

2 A. Cash cheques at the bank and the cash was brought to me and
3 we executed our business.

4 Q. Where did you keep the cash?

14:34:33 5 A. Oh, in a small office in my - I mean in the mansion.

6 Q. So when was it that you had the cash brought to you?

7 A. What do you mean when? Whenever the need arose.

8 Q. Well, how much times did you pay for arms from Serbia?

9 A. Well, the payments was over time. There was one major
14:34:55 10 shipment and one major payment.

11 Q. So was there only one occasion then when you had cash
12 brought to you?

13 A. No.

14 Q. Why did you have cash brought to you on multiple occasions
14:35:09 15 then?

16 A. Mr Koumjian, you may disagree with how we did business in
17 Liberia --

18 Q. Sir, please answer the question.

19 A. I'm answering the question. You may disagree, but the fact
14:35:21 20 of matter is, at that particular time, that was what I was
21 authorised and had the authority to do and I did. Now, I don't
22 remember whether it was 50 times or 10 times, but all I did to
23 secure Liberia was to make sure that when money had to be
24 brought, it was accumulated and we paid to get our material.

14:35:40 25 Q. Sir, let me repeat the question. Perhaps you didn't
26 understand it. You've said you made one purchase. Why did you
27 have cash brought to you on multiple occasions for one purchase?

28 A. When I mean one purchase, I'm talking about in terms of
29 order. There were not three, four, five different orders. There

1 was one order. That order was paid for in different
2 installments.

14:36:11 3 Q. Let's read your answer on my page 63, line 2: "Well, the
4 payments over time, there was one major shipment and one major
5 payment."

6 A. I've just explained what I really mean, that I'm talking
7 about one order and there were payments.

8 Q. How did you - from the cash going to you in your small -
9 you said in your office, where did you cash go then?

14:36:31 10 A. What do you mean where? It went to the individual that was
11 responsible.

12 Q. Did he come to Liberia, the person that you were buying the
13 weapons from, to collect cash?

14 A. No, I did not deal with the people. The person that
14:36:46 15 managed that entire transaction was my chief of protocol that
16 handled it. As the material came, defence took over. But the
17 whole operation of the purchase of arms was left with my chief of
18 protocol.

19 Q. Musa Cisse?

14:36:56 20 A. That is correct.

21 Q. The man you sent with Sam Bockarie in November 1998 to
22 Burkina Faso?

23 A. I did not send Sam Bockarie. I disagree. I did not send
24 Musa Cisse with Sam Bockarie anywhere.

14:37:10 25 Q. Sir, did you send Musa Cisse to accompany Sam Bockarie to
26 Burkina Faso in November 1998?

27 A. Yes.

28 Q. I want to ask you a little bit about what you told us about
29 receiving this money from Guus Kouwenhoven and the embassy of

1 Taiwan and depositing it into this account at LBDI. First, I
2 would like the witness to be shown MFI-193, and particularly page
3 9. This was also read in Court on 26 August at the page
4 reference I previously gave and corrected. I think it's 27748.

14:38:19 5 A. What document is this? I don't --

6 Q. Paragraph 12, I'm going to direct your attention to, sir.
7 This document, just to remind you - perhaps Mr Taylor could be
8 shown the first page. It's titled Preliminary Reaction of the
9 Government of Liberia to the Report of the Panel of Experts
10 Appointed Pursuant to UN Security Council resolution 1306-2000",
11 paragraph 19, in relation to Sierra Leone. In paragraph 12, sir,
12 of this document it states:

13 "It is important to clarify that each logging company
14 operating in Liberia is a signatory to a standardised concession
14:39:18 15 agreement. The concessionaire's obligations are detailed in the
16 agreement and each is required by law to pay all taxes directly
17 into the central government revenue depository maintained by the
18 Ministry of Finance. The statutory agency empowered to assess,
19 receive and collect taxes."

14:39:40 20 Sir, the \$1,999,975 payment that went into this account at
21 LBDI violated this clause because it didn't go to the Central
22 Bank, correct?

23 A. I would say incorrect. But, I mean, your Honours, we have
24 been dealing with financial statements here, and the way that
14:40:10 25 things are jumping left and right, I understand that I'm supposed
26 to answer the gentleman's question. We are taking one sheet of
27 paper, we flash it this way; we take another sheet and flash it
28 that way. I'm afraid that - I mean the essence of my responses
29 are not coming. We may have to look at this whole financial

1 thing because at issue here, and I think we all will agree, is
2 the fact that I did not tell this Court - I have told the world
3 that I did not have a personal account when I had one. This is
4 the issue.

14:40:45 5 So we can't just look at it in these - we have to look at
6 the full picture. And the fact of the matter is, I informed this
7 Court on 1 December about the existence of this account. The
8 transcript, 32795 and 796, talked about the existence of these
9 covert accounts that I told this Court on December 1. 32804 also
14:41:14 10 tells this Court about these deposits that are coming from timber
11 company. I'm not hiding anything. I'm not ashamed of anything
12 here. So I want us to look at it. We have an account opened by
13 me, signed by a government official, brought to bear. The monies
14 in question here, the 1 million that you just asked about,
14:41:36 15 Mr Koumjian, goes through the Finance Ministry. Now you're
16 asking me as to whether something violated a ministry. That's
17 the prerogative of the people of Liberia. It's none of anybody's
18 business if I violated a Liberian law but the people of Liberia.

19 The issue here: Did I lie to this Court? And I did not.
14:41:51 20 It is a government account signed by the government official and
21 your people, Mr Koumjian, spoke to Ms Diarra and she told you
22 people that it was a government account. She told you people
23 back in 2004. You have disclosed some of the information here.
24 It's still hidden from these judges, so what is the whole issue
14:42:11 25 here? This account is a government account. Ms Diarra told you
26 people it was a government account. She told you people how it
27 was operated. You have disclosed some of the information and the
28 rest you haven't as far back as 2004. So now you come and ask me
29 did I violate Liberian law. My answer is none of your business.

1 Q. Sir, this account is in the name of Charles Taylor. It's
2 not in the name of Government of Liberia, correct?

3 A. Well, incorrect. I will disagree with you as you put it.
4 I will disagree.

14:42:38 5 Q. Sir, do you consider yourself the equivalent of the
6 Government of Liberia? Is that what you considered during your
7 presidency?

8 A. Well, that's not the issue. No, I would not consider
9 myself, but when the authority is given to me by the legislature
14:42:54 10 to use any and all means for the protection of the state, and
11 they are aware, I don't care who else is not aware. The
12 legislature of the Republic of Liberia authorised the President,
13 reports were made to the legislature to those committees
14 responsible, accounts were kept of what was going on, and this
14:43:10 15 account ended in 2001.

16 Q. Sir, when did you inform the legislature --

17 A. All along.

18 Q. -- of Liberia about the money you received, the \$3.5
19 million --

14:43:13 20 A. I said the --

21 Q. Please, I haven't concluded my question. The \$3.5 million
22 you obtained in March 2000 from the Government of Taiwan into
23 this LBDI account, when did you inform the legislature about
24 that?

14:43:30 25 A. Well, listen, if you look back at my response I said the
26 appropriate individuals. You have restricted it now. You've
27 just misquoted me to say I said the - if you look at my response,
28 I said the appropriate area, and that's why it was opened in the
29 bank. Why would anybody - I want to be crooked and open an

1 account in the bank?

2 Q. Sir, what was the purpose of putting the account in your
3 name as opposed to leaving it in the name of the Government of
4 Liberia?

14:44:00 5 A. That's the system of the bank. The bank - we did not want
6 it open as a government - I mean as a Government of Liberia.
7 Excuse me, as an account from the Central Bank that would be used
8 in the IMF and the World Bank would know. If you look at, your
9 Honours, the dates, I signed on the 8th. Kadiatu signs a week
14:44:25 10 later. What is the process? There is still - we are discussing
11 who, which official, some people were saying other people, we
12 finally decided that we wanted it very quiet. Kadiatu goes and
13 she signs the signature card and if we want to be fair in this
14 trial which you are administering justice, Mr Koumjian, maybe if
14:44:46 15 the cheques were brought here for the honourable justices to see
16 they would see who signed the cheques, okay. I admit that I
17 signed some cheques but this was an account operated by Kadiatu
18 Diarra and I was fully aware, acquiesced and I take full
19 responsibility because it was what was expected of me as
14:45:08 20 President. Now we may disagree as to maybe as compared to other
21 systems. This is what I was authorised to do. I did it, got
22 through with this operation and your Honours will see that this
23 account closes in 2001.

24 Q. Sir, Kadiatu Diarra, any action she took in regards to this
14:45:26 25 account were under your directions, correct?

26 A. Fully. 100 per cent.

27 Q. You are not trying to blame her for anything in this
28 account?

29 A. No, no, no, at all. I take full responsibility.

1 Q. So this account was completely under your control, correct?

2 A. This account was under my authorisation and control, yes.

3 Q. Sir, aside from paying for arms from Serbia what else did
4 you use the account for?

14:45:48 5 A. That account was used to pay the SSS. It was used to pay
6 the ATU. It was used to carry on what we call humanitarian acts
7 on part of the President. All of these done - covert military
8 operation were paid from that same account.

9 Q. Sir, why would you carry out humanitarian acts on behalf of
14:46:18 10 the President through a covert account?

11 A. Depending on the type of - it depends on what was available
12 and how fast it could be managed. If we had an emergency
13 situation where for example we had a case - we had several cases
14 where the bombings, there were several injured people, we had to
14:46:40 15 charter an aircraft immediately to take them to La Cote d'Ivoire
16 at the Polio clinic. The cash that is available we paid. It's a
17 Government of Liberia operation. We would rush, take the
18 physical cash, pay, and replenish the account. So this account
19 was use in a way that will serve the interests of the Government
14:46:58 20 of Liberia and making sure that things were proper.

21 Q. Sir, why would the pay, the salaries, of SSS and ATU
22 soldiers be paid out of a covert account?

23 A. Because the amounts that they were being paid far exceeded
24 the amount that was paid the ordinary - we've been through this -
14:47:21 25 armed forces personnel. I told this Court that the ATU were the
26 highest paid in the country. A private made, if I'm not
27 mistaken, some \$300, \$400 a month. Up to a general that made
28 about 1,000 or better. They were the best paid in the whole
29 republic. The Secret Service was very paid and other agents -

1 other individuals and depending on the operation were paid.

2 So it was handled from a secret account in order to make
3 sure that there was no internal conflict between and amongst the
4 other armed forces by going through a payroll through the Finance
14:47:58 5 Ministry. It may sound unorthodox but this was authorised and we
6 did it.

7 JUDGE SEBUTINDE: Let me just ask clarification. When you
8 say, Mr Taylor, that the account was used to pay the SSS and the
9 ATU, was this just their salaries or also their operations?

14:48:20 10 THE WITNESS: It was salaries and operation. Now, for
11 example, the SSS took a regular - I don't know that's the word we
12 want to call it, salary. Okay, I can use that word because it
13 was more than a salary. The SSS received a payroll salary amount
14 but they received additional - what would be the right word to
14:48:42 15 use? Remuneration, or whatever, on a monthly basis, okay, as a
16 means of encouraging their work. The ATU was not paid from any
17 payroll. They were given an amount as professional soldiers and
18 that's how we conducted it.

19 MR KOUMJIAN:

14:49:08 20 Q. Sir, aside from the \$3.5 million from the Taiwan embassy
21 and the \$2 million minus the \$25 fee that Citibank collected from
22 Natura Holdings, Guus Kouwenhoven's company, what other funds
23 were put into this account?

24 A. Oh, different funds. Beside the 2 million there were other
14:49:38 25 amounts that were brought in cash. \$150,000, \$200,000.
26 Depending on the operation. Sometimes we took what we call
27 through the Finance Ministry pre-tax credits from certain
28 companies because the government was cash strapped to do things.
29 So there were different different amounts that came in.

1 Q. Sir, you said sometimes \$150,000, \$200,000 cash were
2 brought in. Tell us who brought in \$150,000 to \$200,000 cash?

3 A. It would be sent by Natura and other timber companies.

4 Q. Through Guus Kouwenhoven, is that what you are saying?

14:50:23 5 A. Through his company, yes.

6 Q. What other timber companies gave you large amounts of cash?

7 A. I don't recall all the names. I'm saying that cash did
8 come. When we wanted the cash, the Ministry of Finance would
9 request certain pre-tax credits. It would come and it would be

14:50:41 10 deposited in the account.

11 Q. What else besides from timber companies? What other
12 sources did you have?

13 A. That's it. That's it. We didn't have to the best of my
14 recollection - in fact we may very well find out that most of the
15 cheques on a day to - I didn't operate the account on a
16 day-to-day basis. What I'm trying to get very clear to these
17 judges, the world and more especially the Liberian people is that
18 I authorised it and even though I did not go through it on a
19 daily daily basis I was fully aware. It was with my authority.

14:51:18 20 Q. I'm glad you are fully aware. So let's go back then and
21 ask you some questions, perhaps you can explain the account
22 history in tab 10. This has not yet been marked for
23 identification but, sir, the second page, the account summaries.
24 We see in the column labelled 12/99, the left column, that for
14:52:00 25 that month there is a credit amount of \$917,243. Where did that
26 come from?

27 A. Which are you looking at? The first?

28 Q. If you look at the second page of tab 10, the account
29 summaries is the table at the bottom. The second line says, it

1 appears to me, the first digit is cut off but something 999/12
2 and then the credit amount for that month, \$917,243 and just --

14:52:51 3 A. I'm afraid I'm not understanding the same thing you are
4 understanding, Mr Koumjian. So I disagree with all these figures
5 you are calling.

6 Q. Perhaps you could look also at the MFI-308 under tab 5. If
7 you compare the second page of that document, the account
8 summaries, to the second page under tab 10 account summaries, you
9 will see it's identical except for the last two months, August
14:53:21 10 and September. You recall MFI-308 tab 5 is the July statement.

11 A. Yeah, but I should ask you, Mr Koumjian, to tell me because
12 if this is an amount actually that is accounted for as you are
13 mentioning it should be in the account statement.

14 Q. My question, sir, I don't have the account statement for
14:53:45 15 December. What did you receive --

16 A. I don't know.

17 Q. -- \$917,000 - from whom did you receive \$917,000 in
18 December 1999?

19 A. That's what I'm trying to tell you. I don't see what you
14:53:59 20 are referring to. I see a number. And you don't show me a
21 document that shows that it is a debit amount as received by the
22 Government of Liberia. I don't know the --

23 Q. Well, of course not.

24 A. [Overlapping speakers] so where is the account statement?

14:54:18 25 Q. Let me make myself clear, Mr Taylor. It's not my position
26 that these are monies belonging to the Government of Liberia.
27 This is your personal chequing account?

28 A. We disagree, Mr Koumjian.

29 Q. Yes, I understand that.

1 A. Very well.

2 Q. Sir, let me ask you this: You told us you were kept very
3 well informed, you were well informed about this account. Can
4 you explain any deposit of 917,000 to your account in December
14:54:46 5 1999?

6 A. I was kept informed but I do not recall the individual
7 amounts. I have told you this. I do not recall the individual
8 amounts. But also I do not see how can you conclude that this is
9 a Government of Liberia deposit except you show me on the account
14:55:04 10 statement where this so-called deposit, whether it was a debited
11 deposit or a credit received. So where is the accounting for
12 that?

13 Q. Let me just try to help you then, Mr Taylor.

14 A. No, don't help me, please.

14:55:18 15 Q. Please, I'm going to try to help you. Let's go to the
16 third line up on that account summary. So in tab 10 it's the
17 third line up in the account summary. If you went back to tab 5
18 which is the July statement it would be the last line. We see in
19 the column --

14:55:46 20 JUDGE SEBUTINDE: [Microphone not activated].

21 MR KOUMJIAN: Tab 5 the last line I'm pointing out of the
22 account summary is identical to the third to last line in tab 10.
23 They both cover the period July 2000 in my submission:

24 Q. Let's use tab 10. I believe it's a slightly better copy.
14:56:12 25 You'll see that in the sixth column from the left or, if you want
26 to do it the other way, the fourth column from the right, it's
27 labelled CR amount. I'm submitting to you, Mr Taylor, that's the
28 amount that was credited to the account during that month, the
29 total amount credited to the account. And we see for the month

1 07, three lines up, \$1,999,975 was credited to the account. If
2 you look over two columns to the right, number of credits, 1. So
3 there was one deposit in July 2000 of \$1,999,975?

4 A. So to you --

14:57:03 5 Q. I'm just trying to help you, so let me just make this
6 complete so it's clear.

7 A. No, but a credit is not what you deposit. A credit - if
8 you say that that was credited to me as a deposit, a credit on
9 the bank - on a financial statement is not what you deposit in a
10 bank. It would be shown on a debit statement.

14:57:19 11 Q. Mr Taylor, let's look - so we're also clear on that amount,
12 which is \$25 less than 2 million. If you look at tab 8, that was
13 the Citibank record showing the transfer to LBDI from Natura.

14 You'll see that the bank account for LBDI, 360 - it's at the top
14:57:49 15 we have the number of LBDI correspondent account number 36006105,
16 was credited in July 2000 with \$1,999,975 and it's noted in the
17 text - under details it says for further credit to account and
18 gives the account number 0020132851-01 and then notes \$25 fee
19 deducted. So it says \$2 million minus \$25.

14:58:30 20 So, Mr Taylor, I just pointed that out because you asked me
21 to help explain to you what the credit amounts were in the column
22 in the account summaries. Can you explain the credited amount
23 for December '99 of \$917,000 and something?

24 A. Can I remember what exactly it is? No. I will remember if
14:58:55 25 it was shown on the account statement. I don't remember what
26 this amount was. If it's an amount into the bank, so be it, if
27 it's credited to that account. The problem I'm having with this
28 summary here is that I've dealt with financial statements before
29 and they are prepared for different reasons. You are trying to

1 say that this is a summary because certain figures are being
2 mentioned here of that particular account and maybe the purpose
3 for this - like I see to the far right the balance trend, maybe
4 they were trying to construct a graph, because if you look at the
14:59:34 5 credit amount of 1,999 what you are going to do with the debit
6 amount of 1 million something. So I don't know if you really
7 understand, you know, how these statements are being done but the
8 fact of the matter is I do not recall what that figure is.

9 JUDGE SEBUTINDE: Mr Koumjian, in that figure of I think
14:59:54 10 it's - wait - 999,917 right? That's the figure we're talking
11 about?

12 MR KOUMJIAN: For the second - for the December?

13 JUDGE SEBUTINDE: The second from the top.

14 MR KOUMJIAN: What I get is 9 - perhaps - I'm having
15:00:10 15 trouble reading it. I thought it said 917, but I --

16 JUDGE SEBUTINDE: 917, yes, you are right.

17 MR KOUMJIAN: 243.

18 JUDGE SEBUTINDE: What I'm trying to show to you,
19 Mr Koumjian, is that if you look in the column that says number
15:00:22 20 of credits, it says two credits.

21 MR KOUMJIAN: Correct.

22 JUDGE SEBUTINDE: So to ask the witness what was that
23 figure for doesn't take into account the fact that it was split
24 into two.

15:00:33 25 MR KOUMJIAN: Thank you.

26 JUDGE SEBUTINDE: Credits.

27 MR KOUMJIAN: That's fair. Thank you:

28 Q. Mr Taylor, do you recall any deposits totalling \$917,000 in
29 December 1999?

1 A. I do not recall the specifics of it, Mr Koumjian. This is
2 why if an account statement was present, it would say, but I do
3 not recall it. I'm not saying that it did not happen. What I'm
4 saying, I do not remember the specific detail.

15:01:04 5 Q. Now, it also indicates for that month \$900,017 was debited
6 from the account that month. Did you receive in cash that month
7 \$900,000 plus? Would you remember that?

8 JUDGE SEBUTINDE: Mr Koumjian, there are ten debits.

9 MR KOUMJIAN:

15:01:28 10 Q. And that was ten different transactions.

11 JUDGE SEBUTINDE: Different debits.

12 THE WITNESS: No, Mr Koumjian. But I would assume that
13 it's for different operations that it could be paying the SSS,
14 could be paying the ATU. It could be a number of things that
15 Ms Diarra was taking care of for government. Now, I wouldn't
16 know the - that's why - for your Honours' sake, that's why the
17 account is one of two signatures, that I could just say,
18 "Kadiatu, go, take care of this," and it would be done. So I
19 don't know - now, if you had been helpful by bringing the
15:02:04 20 cheques, we - these judges would see who actually signed the
21 cheques and how the accounts operated, but the cheques are not
22 here. So I really don't know the details.

23 MR KOUMJIAN:

24 Q. What did you do with the cheques, Mr Taylor? It was your
15:02:19 25 account.

26 A. It was not my account. That - those cheques were, I'm
27 sure, kept by the Ministry of State. It was not my personal
28 account.

29 Q. I'm sorry, are you saying that this account was part of the

1 Ministry of Finance?

15:02:49 2 A. No, Mr Koumjian, that's not what I'm saying. I said it was
3 kept by the Ministry of State, I'm sure, because Kadiatu worked
4 as an assistant minister in that state with responsibility as
5 personal assistant to the President. In fact, in our
6 administration, most of the assistant and deputy ministers in the
7 Ministry of State, they are called assistants to the President,
8 okay. That's how we call it. And so I'm sure as the bank
9 statements returned, they will keep them. But the bank would
15:03:11 10 have copy of the cheques anyway. You people dealt with these
11 banks. I haven't dealt with them all these years, so I'm sorry
12 you are not helpful here by not bringing these. I don't recall,
13 to be short. I don't recall the details. Sometimes I very
14 rarely look at these accounts.

15:03:29 15 Q. Mr Taylor, let's look at another month. Let's look at
16 March. Let's come back to March 2000. Now, we saw the one
17 transaction where - tell me if I'm wrong - you admit you received
18 \$3.5 million from the embassy of Taiwan into this account,
19 correct?

15:03:48 20 A. Yes.

21 Q. Now, we see, looking at the account summary for that month,
22 that there were only two credits that month to the account and
23 the total amount credited was \$6,905,500. So, sir, if you
24 subtract \$3.5 million, that leaves unaccounted one additional
15:04:15 25 deposit for \$3,405,500.

26 A. I don't know which accountant you dealt with, Mr Koumjian.
27 That's got to be really a whacky accountant because what you are
28 talking about, if - this is why I'm saying that unless you bring
29 the accountant statement, you will never understand it because

1 you cannot have on the general statement showing 3 point
2 something million dollar as a credit to the Government of Liberia
3 and on this statement it does not show it at all. So the
4 question is: Is this a real statement then?

15:04:53 5 Q. Sir, did you forget - is it possible that you've forgotten
6 about a \$3.4 million deposit to this account?

7 A. How does somebody forget \$3.4 million?

8 Q. Then where did it come from, sir? Where is the - the
9 \$3.4 million in addition that was deposited in March 2000, what
10 was the source?

15:05:11 11 A. Well, who said that - what - again, where do you have that
12 as an additional deposit in March 2000?

13 Q. Sir, the March 2000, if you look at the account summary and
14 go down five lines, you see the amount of credit, the credit
15 amount on the sixth column, \$6,905,500. We see there are two
16 credits that month to the account. So, sir, where did the other
17 \$3.4 million come from?

18 A. But this is what I'm trying to say, so what you are going
19 to do - so what you think about the debit amount next to the 6
15:06:02 20 million, how do you interpret that, for you to be asking where
21 the other 3 point something million come? How do you interpret
22 the debit amount to the left of that?

23 Q. Sir, the debit amount shows what was withdrawn under your
24 direction from the account, \$4.7 million. I'm going to ask you
15:06:18 25 about that later. I'm asking now about what was credited to the
26 accounts. What was credited to the account - what was the second
27 credit that was \$3.4 million?

28 A. That's what I'm saying, Mr Koumjian. It shows that there
29 two deposits. I don't remember what the other one was. Our

1 dispute here is not that money went in and out. It would be very
2 clear to see - I don't remember, all these years later, the
3 details and you have not provided the account, because what this
4 bank should have done for you was to provide the statement of
15:06:53 5 account. You have not provided the statement of account.

6 So I'm sorry, your Honours, I can't help, because I don't
7 remember the details. If the statements of account were here, it
8 would be clear to everybody. So we're just spewing out numbers
9 without understanding. I cannot - there are two transactions
15:07:10 10 during this particular period. If this is our account, and I'm
11 trying to say I don't recall because the first transaction that
12 we can talk about, we've seen it in an account statement that you
13 showed the judges on - I don't know how you got your thing here -
14 to show the deposit. But I do not recall the others because you
15:07:30 15 do not have a statement of account here.

16 Q. In other words, you will only recall the source when I have
17 the proof of the source, that's the only time you can recall it?

18 A. That's not what I'm saying, Mr Koumjian. And please do not
19 interpret my thing that way. I am saying I do not recall.

15:07:47 20 Q. Sir, is it possible - first of all, let's remind ourselves.
21 Do you recall what you told us was the total budget for Liberia
22 for 1998?

23 A. I don't recall the exact amount. Could have been around
24 50 million I said.

15:08:06 25 Q. Let's see if I can find it for you.

26 A. 40, 50 million.

27 Q. I'll come back with a page reference for that in a while.
28 Sir, \$3.4 million was an awful lot of money to the people of
29 Liberia in the year 2000, wouldn't you agree?

1 A. Oh, I will fully agree.

2 Q. The average Liberian was making - let's put it this way:
3 About 80 per cent of Liberians lived on less than \$1 a day,
4 correct?

15:09:04 5 A. I would say roughly, yes.

6 Q. And you're saying, according to what your testimony this
7 morning, this is an account entrusted to you, so how is it that
8 you cannot remember where \$3.4 million came from?

9 A. Mr Koumjian, what was even more to the people of Liberia
10 was saving their lives. And that's why their representative, the
11 legislature, authorised the President to use any and all means in
12 defence of the republic. So for you to tell me now that
13 everything that came - I opened this account, Mr Koumjian - you
14 asked me about 1998. This account, don't let's forget, was
15:09:43 15 opened in December 1999 at a time when the country had what? Had
16 had two attacks on the republic and that account is not open in
17 1998 when you asked me about the budget. But the account, if you
18 remember, is opened in December 1999 at a period when the country
19 is now at war. And I have no apologies for what happened in that
15:10:09 20 account, none, because I was authorised to do it.

21 Q. Well, let's talk a little bit more about what you did with
22 the money. You asked me to address the debits for that month, so
23 let's look at the debits for the month of March 2000. We see
24 that the total is \$4,722,370.48. Sir, what was done with this
15:10:35 25 4.7 million which we see came out in 68 debit transactions upon
26 reading --

27 A. I'm sorry, Mr Koumjian, I can't help you. I don't
28 remember. But I have told this Court - you just said it - 68
29 transactions. They varied from salary payments of these people,

1 covert activities. I have told you, Mr Koumjian, I don't
2 remember them. It would have helped this Court, since you people
3 went to this bank with an order, you people should have gotten
4 all the documents. I don't remember.

15:11:10 5 Q. Sir, what was the total salary that you paid the SSS per
6 month?

7 A. It depends. The SS - I don't remember the exact layout
8 right now, but the SSS and the ATU, I can say, were very well
9 paid. A private in the SSS and/or the ATU received not less than
15:11:33 10 \$300 a month.

11 Q. My question, sir, is the total for the SSS. Do you know
12 what that was?

13 A. No. Then you have to take that - Mr Koumjian --

14 Q. Mr Mr Taylor, you're responsible --

15:11:43 15 A. No, listen.

16 Q. -- to the Liberian people for how you spend the money,
17 according to you.

18 A. Let me answer your question, please. Let me answer your
19 question. Mr Koumjian, when you look at payments of salaries,
15:11:58 20 the salary payments varied. What a private makes, a sergeant
21 doesn't make, a lieutenant doesn't make. And, Mr Koumjian, then
22 what's going to happen to me does. It's impossible for me to sit
23 here and lie to these judges and tell them I remember the monthly
24 amount paid the SSS when I was in office. No.

15:12:20 25 The only thing I can say with honour is that whatever
26 payment was made out of this account, I authorised it. And I
27 dealt with this official because I knew that she would not steal.
28 We had a parable in Liberia: "You give a man money, he will
29 steal and give it to his girlfriend. You give a woman money,

1 even if she steals it, she will take care of her children." So I
2 trusted this official.

3 Q. Mr Taylor, are you sure you want to use that parable?

4 A. Try me.

15:12:54 5 Q. Sir, what was the total that you paid the ATU per month?
6 Do you know?

7 A. I don't know the - I can just - roughly, roughly, the ATU
8 could have been paid as - and I'm being very rough about it -
9 maybe up to \$150,000 or more a month just on the ATU salary.

15:13:17 10 There was some 2,000, 3,000 men that were paid very well.

11 Q. And are you saying that none of the salaries for these key
12 security personnel were reflected in the official budgets for
13 Liberia?

14 A. That's not what I said. If you look in my testimony, just
15:13:32 15 a few minutes ago, I told these judges that the SSS received
16 salary from the government, but we gave them an additional
17 amount. And remember I was trying to say whether to call it
18 remuneration. Remember?

19 Q. So this additional amount was at your discretion?

15:13:49 20 A. The amounts that were paid to the SSS and the ATU were
21 based on my discretion based on the professional nature of their
22 work, yes.

23 Q. Mr Taylor, I'm going to ask you about a few other deposits
24 into this account and just to see if you recollect. There is a
15:14:27 25 deposit in the second to last month in tab 10 which is 08/2000 of
26 I believe it says \$493,250 and that was a single credit. Do you
27 recall the source of that deposit?

28 A. No, I do not.

29 Q. Then the next month, September, there's a single deposit of

1 half a million dollars. Do you recall the source of that
2 deposit?

3 A. No, I do not.

4 Q. Mr Taylor, I want to remind you about testimony you gave
15:15:14 5 about money given from Taiwan just a short time ago, 26 November.
6 If Mr Taylor could be shown page 32633. Sir, you were asked on
7 that day by myself:

8 "Q. After you became President did you receive any further
9 assistance - money from Taiwan?

15:16:12 10 A. Personally no, but the government yes. And, by the
11 way, Taiwan even before I became President had diplomatic
12 recognition with the Republic of Liberia even before I
13 became President.

14 Q. They probably paid money to President Doe for that,
15:16:30 15 correct?

16 A. I don't know. I can't comment on that. I don't know.

17 Q. But after you became President you received no further
18 funds?

19 A. Personally, no."

15:16:45 20 PRESIDING JUDGE: I'm having trouble picking up this
21 reference, Mr Koumjian. I haven't found any of your questions on
22 that page. That's 32633 I think you mentioned.

23 MR KOUMJIAN: That's the reference that I have. On 26
24 November.

15:17:00 25 MS IRURA: Your Honour, I have the page open but it does
26 not contain the information Mr Koumjian is reading.

27 PRESIDING JUDGE: That's what I was saying. I think you
28 may have the wrong reference.

29 MR KOUMJIAN: I think for the second time I've repeated the

1 wrong di gi t. 32663.

2 PRESIDING JUDGE: What line are you starting from?

3 MR KOUMJIAN: To be clear in total context I'm starting
4 from line 9:

15:18:05 5 Q. I asked you:

6 "Q. After you became President did you receive any further
7 assistance - money from Taiwan?

8 A. Personally no, but the government yes. And, by the
9 way, Taiwan even before I became President had diplomatic

15:18:22 10 recogniti on wi th the Republ ic of Li beri a even before I
11 became Presi dent.

12 Q. They probably paid money to President Doe for that,
13 correct?

14 A. I don't know. I can't comment on that. I don't know.

15:18:37 15 Q. But after you became President you received no further
16 funds?

17 A. Personally, no.

18 Q. Well, that begs the next question: Did your government
19 receive funds from Taiwan after you became President?

15:18:53 20 A. That is correct, yes.

21 Q. What did your government receive?

22 A. The Government of Liberia received an annual grant of
23 \$10 million.

24 Q. How did you receive that money? Was it --

15:19:11 25 A. It came into the Government of Liberia the normal way
26 all other revenues came.

27 Q. Was it through some type of bank transaction?

28 A. They were bank transactions.

29 Q. Into what entity of the government?

1 A. Into the financial structure.

2 Q. Did the embassy of Taiwan hand you \$10 million cash or
3 how did the money come --

4 A. No, it was done through a bank transfer. Nobody - they
15:19:44 5 didn't deal with no cash. It was done through a bank
6 transfer.

7 Q. What account would have received that money?

8 A. I don't know how the Central Bank handled it but it
9 came through the government normal systems.

15:20:04 10 Q. So there was a bank account at the Central Bank for
11 government revenue?

12 A. All government revenue of the Republic of Liberia were
13 deposited at the Central Bank. I don't know how it worked
14 internally but --"

15:20:23 15 Then I went on to ask you about the million dollars
16 received before becoming President. So, Mr Taylor, you
17 previously told this Court that all government revenue including
18 that received from Taiwan since you were President came through
19 the normal government structure, through the Central Bank. Why
15:20:47 20 are you telling - why didn't you tell us on 26 November about
21 money in this account at LBDI?

22 A. I have quoted the pages to this Court where I told them
23 about this money at LBDI, Mr Koumjian. Depending on your
24 question I can answer and if you look into my statements when
15:21:07 25 you asked me was it given to you personally I keep saying no. I
26 said the government.

27 Now, Mr Koumjian, that's going to be left to these judges
28 because how covert activities work in Liberian government
29 regarding finances is one matter that I'm sure we will disagree

1 from now until hell freezes. How the monies were handled to get
2 into these accounts, there was not just - the President was just
3 - there were officials of government that set up a system on
4 making sure that this covert account worked. And of course I
15:21:43 5 don't know all of the details. I opened the account. It was
6 agreed. I operated it with another official. So all these other
7 questions I'm afraid that I can't - I can't answer you on the way
8 how, you know, you are asking them. The only thing I can say is
9 that there's an account and it's operated by the government in
15:22:05 10 that particular covert way for whatever reason the Liberian
11 government at that time decided. That's all I can say.

12 Q. Mr Taylor, let's look at some other records from this
13 account. I would ask you to look behind tab 12, only the first
14 seven pages because after that it refers to a different account.
15:22:41 15 May tab 10 please be marked for identification.

16 PRESIDING JUDGE: Yes. That document behind tab 10 is
17 marked for identification MFI-313.

18 MR KOUMJIAN: Just to help with the transcript, this is a
19 document entitled - it says this statement covers 1 August
15:23:04 20 through 11 September 2000. It's at the top Liberian Bank For
21 Development and Investment, account 20132851-01:

22 Q. Sir, I'm not going to use the pages past the first seven
23 pages because this refers to another account. In the first seven
24 pages we see that there is an account number that appears at the
15:23:53 25 top left. First it says Liberian Bank for Dev and Inv and then
26 there's an account number, it's stated like this:

27 02210/232851/01, Charles G Taylor, Congo Town. Mr Taylor, did
28 you have more than one account in the LBDI bank?

29 A. Mr Koumjian, that's the same account, 32851. It's the same

1 account.

2 Q. Thank you. That's what I wanted you to say. Thank you.

3 A. There's not a second account, there's just that one.

4 Q. Thank you.

15:24:38 5 A. And to help your Honours --

6 Q. Actually there is a second account but it doesn't concern
7 me, it's a very small -

8 A. No, excuse me, your Honours. If you look at that
9 particular account at the beginning balance of 16,020 you will

15:24:53 10 see it's reflected in the statement behind tab number 10. If you
11 look at that balance coming from that accounts of 16,020.16,
12 that's reflected as the brought forward balance on there. It's
13 not a different account. It's the same account. I don't know if
14 your Honours see what I'm talking about.

15:25:14 15 Q. Mr Taylor, for once we're in agreement. We're in
16 agreement.

17 A. It's not a second account.

18 Q. I absolutely agree with you.

19 A. Okay, very well, thank you.

15:25:25 20 Q. Let's go through a few transactions. This appears to be a
21 printout of various charges, debits and credits to this account
22 and there's a few dates I want to ask you about. Let's start, if
23 you look down about ten lines where it says 4/12/2000. We see
24 amount, \$2 million and I'm not sure if that's zero cents or 6
15:26:04 25 cents credit, bringing the balance to \$2,013,288.83 so it must
26 have been exactly \$2 million. Mr Taylor, where did you get this
27 \$2 million from that was deposited into this account at LBDI on
28 4/12/2000?

29 A. December 2000? I don't recollect. This could have been

1 even from the government. This could have been, December - this
2 could have been from the Government of Liberia.

3 Q. To you personally? To your personal account?

4 A. To this account; not my personal account.

15:26:48 5 Q. Why would the government put \$2 million into this account?

6 A. Depending on what transactions were coming up it was made
7 available. That's why I'm saying that ministries are involved in
8 this, I'm sure this transfer was done.

9 Q. Let's go, Mr Taylor, to page 2. We go down seven lines.

15:27:18 10 It's a transaction dated 10/01/2001.

11 PRESIDING JUDGE: My page 2 doesn't have seven lines.

12 MR KOUMJIAN: Excuse me, page 3. Thank you. I missed page
13 2. Page 3. The third page in the bundle:

14 Q. Looking down about seven lines, 10/01/2001 it then states
15:27:57 15 in the - a CDP and then a number which I don't think we need to
16 read and then a credit amount, 150,000. Then it has a debit
17 amount of 2,923. It indicates in the far right "cash deposit
18 C/A". Do you know, Mr Taylor, where \$150,000 cash, how that came
19 to be deposited into this account?

15:28:36 20 A. I'm not sure but it's probably coming - I don't know the
21 source but there's another 150,000 on the second line from a
22 cheque. So monies would come into this account depending on the
23 need for it.

24 So within this period of time there's a first 150,000 and
15:28:56 25 there's a second 150,000. I don't know the workings but
26 depending on what the need of the account was, this could be
27 coming from government sources either through maybe some company
28 like if we were very, very hard strapped by this particular time
29 and don't let's - and this is in 2001 so I don't recollect the

1 source, I just see it but these - I'm sure these happened, yes.

2 Q. So just to deal with the second line since you brought it
3 up, this is the line dated 8 January 2001?

4 A. Uh-huh.

15:29:35 5 Q. And it shows a debit of \$150,000 and on the last line it
6 seems to say "cash cheque" with a number?

7 A. Yes. Somebody brought in a cheque and deposited it in the
8 account, yes.

9 Q. A debit, sir, would be something withdrawn from the
15:29:58 10 account --

11 JUDGE SEBUTINDE: [Microphone not activated] is a debit.
12 It's different from the first figure, which was a credit.

13 THE WITNESS: No, no, no. Excuse me, your Honour. The 150
14 on the second line is no different from the 150 on the line - the
15:30:08 15 other line. These three lines, you will see the first figure,
16 those first set of figures are the amounts. The right-hand side
17 are the balances. So if you look there was a balance of 315 in
18 the account, a deposit was made of 150,000 and the balance became
19 149. In this statement, it is only showing amounts that are in
15:30:38 20 and the balances left. That can be reflected on page 1,
21 your Honour. You will see what I'm talking about. So that is a
22 deposit, and what we owe the bank is taken out immediately.

23 MR KOUMJIAN:

24 Q. Sir, I didn't intend to confuse things, but let me clarify
15:30:54 25 something.

26 JUDGE DOHERTY: Sorry, Mr Koumjian --

27 MR KOUMJIAN: I think I may be addressing the same topic.
28 Let me try this:

29 Q. You'll see that, Mr Taylor, the first line shows that the

1 balance at that transaction forward is \$315.83.

2 A. Yes.

3 Q. There then is a debit, a withdrawal of \$150,000. The
4 account then has a negative balance, a debit balance of
15:31:28 5 \$149,684.17.

6 A. Yes, we agree on that.

7 Q. So, actually, LBDI allowed you to carry a negative balance
8 for various periods of time?

9 A. That is correct.

15:31:37 10 Q. Going to the fifth --

11 A. And you keep saying "you" and I said that is correct. I'm
12 talking about the government.

13 Q. The account that you say that is the government that's in
14 the name of Charles G Taylor personal chequing account on the
15:31:57 15 first - on all the statements, correct, that's the disagreement
16 between us?

17 A. Well, the disagreement is that the account title, actually,
18 if you look at the signature cards, the account title is really
19 Charles G Taylor/Kadiatu Diarra, if you want to be technical
15:32:10 20 about it, because the people that signed the account own the
21 account. That's - so you will look at it that way.

22 Q. Let's go to the fifth page. I'm going to refer you to a
23 transaction in the middle of the page.

24 A. Yes.

15:32:31 25 Q. It's dated 19 April 2001.

26 A. Uh-huh.

27 Q. And you will see just before above it is a \$1 million debit
28 and then the transaction I'm referring to. I'll give you all the
29 lines. First it has the date of 19 April 2001 repeated twice.

1 It then states RAD. The next line - column is 2,653. And then
2 on the next column, 1,500,000 credit. And as we see from the
3 next line, the account had previously been in a negative balance
4 of a little over \$1 million. \$1,003,235.78. And with this
15:33:19 5 deposit, it now has a balance of \$496,764.22.

6 A. Yes.

7 Q. We see, for these two transactions, the one above with the
8 \$1 million debit, it says cash cheque and it has a number, and
9 then below it for the deposit or the credit, process of RAD. Do
15:33:47 10 you recall - can you tell us, Mr Taylor, who deposited or what
11 was the deposit of \$1.5 million on April 19, 2001?

12 A. This had to come from - I would really highly suggest -
13 government sources. This is government revenue being put because
14 of the negative balance in that account and the bank is aware
15:34:11 15 that this is a government operational account. So we had an
16 overdraft and they knew that it would be replenished. They would
17 never let a personal account of an individual be overdrawn by a
18 million dollars. The bank would be crazy. Where would I get the
19 money to pay? So they are aware that this is a government
15:34:30 20 account, so they let the overdraft go and when the government
21 gets the money it sends it back into the account.

22 MR KOUMJIAN: Your Honours, if Mr Taylor could be shown
23 testimony from 18 November, page 31969.

24 PRESIDING JUDGE: Yes, that's before Mr Taylor now.

15:35:33 25 MR KOUMJIAN: Thank you:

26 Q. Mr Taylor, you were being questioned I believe by my
27 colleague about this Central Bank, beginning at line 3:

28 "Q. And when did you change this into the Central Bank of
29 Liberia? When did that occur?

1 A. I would say within the first - we would put through
2 this legislation I think the first few months of my
3 presidency. I would put this to '98. Around 1998.

4 Q. Do you recall what part of 1998 that would have been?

15:36:04 5 A. No, I don't.

6 Q. So this Central Bank of Liberia had important functions
7 for the control of currency?

8 A. Everything, yes.

9 Q. Credit, money flow?

15:36:21 10 A. Money flow, yes. It was responsible really for the
11 monetary control - total monetary control of the country.

12 Q. I think you said that all revenues that were coming
13 into the Government of Liberia would be deposited here.

14 A. At the Central Bank, that is correct.

15:36:44 15 Q. All revenues? No exceptions?

16 A. All revenues."

17 So, Mr Taylor, why did you tell the judges that all
18 revenues came into the Central Bank when we've seen millions of
19 dollars of transactions into this account in the name of Charles
20 G Taylor at the LBDI bank?

15:37:08 21 A. Mr Koumjian, I - let me be very, very clear and answer your
22 question. What I told these judges was true and the essence of
23 these questions - you know, I know I'm not a lawyer, the little
24 trick questions. You people already knew that these accounts
15:37:37 25 were operating. So you asked me all revenue. At this particular
26 time I'm supposed to volunteer and say, "Oh, no, there are some
27 other" - but these transactions are done under the auspices of
28 the Government of Liberia. And when monies come into this
29 account from the Ministry of Finance and other financial sources

1 that are approved by the legislature, Mr Koumjian, that's all
2 that I can say about it. So why did I say all revenue? Because
3 all revenues come into the Central Bank. How it is managed after
4 that is not the Central Bank's prerogative. And when I talk
15:38:12 5 about financial functions, let me be very clear about that
6 because you didn't ask me or your colleague to - there are two
7 policies in the nation. You have monetary and you have fiscal.
8 The monetary policies are decided by the Central Bank. The
9 fiscal policies are decided by government. Monetary regards to
15:38:34 10 the increase or decrease in money supplies, charging bank, what
11 we call reserve rates, and all that kind of stuff. But the
12 fiscal responsibility of the use of taxpayers' money in Liberia
13 is not the function of the Central Bank.

14 So money may come into the Central Bank. After that it
15:38:51 15 flows through the financial circles. That's the fiscal
16 responsibility of the government. So by telling these judges
17 that all revenue went into the Central Bank, all revenues went
18 into the Central Bank, okay? The process of getting it out to
19 get into this account did not violate any laws of Liberia. So I
15:39:10 20 did not mislead the judges to bring this little cunning thing in
21 to try - no, I did not mislead them when I told them that, "Oh,
22 that's the monetary policy, but the fiscal responsibility was my
23 government's responsibility."

24 Q. Mr Taylor, we've seen in the records from the Citibank
15:39:31 25 transfers that in fact the \$2 million minus the \$25 fee from Guus
26 Kouwenhoven and the 3.5 million from the Republic of China, the
27 Taiwan embassy, didn't go to the Central Bank, did not go to the
28 Ministry of Finance. It was transferred directly to your account
29 at LBDI, 328501.

1 A. Where are the transfers? You said transfer. I dispute
2 that. Show me where there are Citibank transfer into - you are
3 misleading these - this Court. There's no Citibank transfer to
4 my account. Show me it on - in these records.

15:40:11 5 Q. Thank you, Mr Taylor. Let's - I have to repeat what we've
6 already covered, but if you look behind tab 9, MFI-312.

7 A. Yes.

8 Q. We see the transfer in the middle of the page from the
9 embassy of the ROC, Monrovia, \$3.5 million for further credit to
10 Charles G Taylor and then gives your account number at LBDI.

11 A. Yes. But that's not what --

12 Q. So it was transferred directly. It didn't go to the
13 Central Bank. It went to your account.

14 A. You said Citibank, Mr Koumjian. Citibank, that was your
15:40:56 15 original statement and I said that Citibank never transferred any
16 money to my account. LBDI - the account is in LBDI. And all
17 LBDI does is, it takes care of an internal transaction. But I
18 challenged you just now to show me where Citibank transferred
19 money to my account. There's no Citibank transferred to my
15:41:18 20 account.

21 Q. Sir, Citibank is just the correspondent bank. The records
22 of Citibank clearly show that the transfer from the Republic of
23 China embassy was direct into your account through Citibank,
24 direct to your account, \$3.5 million, not to the Central Bank of
15:41:38 25 Liberia.

26 A. But that is not correct, Mr Koumjian.

27 Q. Where is the Central Bank of Liberia appear in this record?

28 A. This account statement is LBDI's account, okay? If you
29 look at the transfer, this particular transfer is transferred to

1 LBDI's account and the only place you see our accounts are - you
2 will see in this financial statement of LBDI, they gave the
3 details and references of the account. The money is transferred
4 to an LBDI account.

15:42:10 5 Q. First of all, Mr Taylor, LBDI is not the Central Bank of
6 Liberia either, correct?

7 A. It's one of the operating financial institutions.

8 Q. And further, this says it's transferred to the LBDI account
9 for further credit to Charles G Taylor with your individual
10 account number, 32851-01.

15:42:27 11 A. We disagree about the individuality of the account,
12 Mr Koumjian, so I'll just leave it at that.

13 JUDGE SEBUTINDE: Mr Koumjian, we want to get the record
14 correct. The document behind tab 9 that we're looking at, that
15 both you and the witness are talking about, is a Citibank
16 statement.

15:42:44 17 THE WITNESS: No, your Honour.

18 JUDGE SEBUTINDE: Is it?

19 MR KOUMJIAN: Yes.

15:42:49 20 THE WITNESS: No.

21 MR KOUMJIAN: It is a transaction record from Citibank.

22 JUDGE SEBUTINDE: Exactly.

23 MR KOUMJIAN: An account held by LBDI, their correspondent
24 account, that shows all transfers by Citibank into and out of
25 that LBDI correspondent account. And then --

15:43:04 26 JUDGE SEBUTINDE: Perhaps this is what you should put to
27 the witness since the both of you disagree. I understood it to
28 be a Citibank document that reflects one of its clients or
29 account holders is LBDI. That's why you have this page. But

1 it's a Citibank statement. If I'm wrong, please correct me.

2 MR KOUMJIAN: You understood perfectly. My understanding
3 was Mr Taylor understood this is a record --

4 Q. Mr Taylor, tell me if you don't understand this: -- a
15:43:41 5 transaction record from Citibank, and as you pointed out, it's
6 for the account name - you look at the top left - LBDI. The
7 account number that LBDI has with Citibank is at the top,
8 3600-6105. So this is Citibank's records of transactions from
9 into and out of the LBDI account number 3600-6105.

10 A. That's where I disagree. I disagree. What my
11 interpretation of this statement - this is a - this is an LBDI
12 account statement showing transactions in its LBDI account in
13 dealing with Citibank. This is not a Citibank statement. A
14 Citibank statement would state that it is a Citibank statement.
15:44:34 15 If you look at the account name Citibank does not go and make an
16 account statement for LBDI. So this for me - my interpretation
17 of this, this is an LBI statement - LBDI, excuse me. This is an
18 LBDI statement that is showing the transaction on this day. All
19 of these transactions occur only on 9 March - I mean, excuse me,
15:44:58 20 I mean this month that you have the 29th and the 30th, two days
21 that LBDI - this is an LBDI statement - in my understanding of
22 this accounting record showing its transaction with Citicorp.

23 Q. Mr Taylor, we might disagree about where the record came
24 from but we agree, tell me if I'm wrong, that the embassy of
15:45:22 25 Taiwan transferred \$3.5 million to the LBDI account that we
26 looked at at the very beginning of the day that has the name
27 Charles G Taylor, that has the signatures for you and Kadiatu
28 Diarra on 30 March, correct? The embassy of Taiwan transferred
29 \$3.5 million to that account, correct?

1 A. I thought we covered this.

2 Q. Okay.

3 A. The embassy did transfer money for the use of that account,
4 yes.

15:45:56 5 Q. And if we look behind tab 8 we're also in agreement, are we
6 not, that Guus Kouwenhoven on behalf of Natura Holdings
7 transferred to the same account \$2 million with a \$25 fee
8 deducted on 17 July 2000, correct?

9 A. To which account?

15:46:22 10 Q. To the account - it says here credit to account
11 0020132851-01, the LBDI account that we've been talking about
12 that has your name on it and has as signatories you and Kadiatu
13 Diarra, correct?

14 A. Yes, I asked that question because you see it didn't - so
15:46:51 15 now it's to an account.

16 Q. It has the account number.

17 A. Okay, it's to an account. It doesn't mention Charles
18 Taylor but we know that that's the same account. So I think we
19 understand now when we're talking about this account, so it's not
15:47:03 20 just to your personal, so we can also go to the account.

21 Q. But why didn't that go to the Central Bank as required by
22 Liberian law as you told us would always occur?

23 A. Because of the nature - once the legislation had been
24 passed, because of the nature of the transaction. \$3 million
15:47:22 25 going directly to the Central Bank would have been followed.
26 Again all Citicorp transferring \$3 million to the Central Bank,
27 the use of it, the IMF and World Bank have specialists all in
28 these banks. And let's not forget, your Honours, maybe this is
29 something your Honours ought to know, LBDI is majority owned by

1 the Government of Liberia. It's not just a private bank. It's
2 majority owned by the Government of Liberia.

3 JUDGE SEBUTINDE: Can I seek a clarification on the
4 document behind tab 9. It appears to me that these funds, if we
15:48:01 5 agree that this is a Citibank document, then these funds did go
6 through Citibank in New York. Is that correct?

7 MR KOUMJIAN: Your Honour, I believe as I tried to explain
8 with the examples from the web page for the association, if I'm
9 in Holland and I want to transfer money to someplace like Sierra
15:48:23 10 Leone my ABN Ambro may not have an account direct relationship
11 with a bank in Sierra Leone. So let's say Armenia. So if I want
12 to transfer money to Armenia from ABN Ambro, they may have an
13 account, both the bank in Armenia and ABN Ambro may have a
14 relationship with a bank in Paris, so that bank is the
15:48:46 15 correspondent bank that handles the transaction.

16 JUDGE SEBUTINDE: Mr Koumjian, don't complicate things on
17 me. I'm not very good at figures. But I'm looking at the
18 document where, for instance, we see the debit party. If you are
19 looking at that - the information that accompanies the 3.5
15:49:06 20 million. The debit party, there is an account I think which is
21 ICBC New York. Is that the --

22 MR KOUMJIAN: In tab 9.

23 JUDGE SEBUTINDE: Tab 9. I'm looking at the embassy of the
24 ROC, Monrovia, Liberia, debit party. ICBC, NYC; what is that?

15:49:33 25 MR KOUMJIAN: That is a bank that has a relationship with
26 Citibank, transfers the money to Citibank and Citibank transfers
27 the money.

28 JUDGE SEBUTINDE: Citibank, New York?

29 MR KOUMJIAN: Yes.

1 JUDGE SEBUTINDE: So, in other words, these are not funds
2 that would escape the eye of someone in New York?

3 MR KOUMJIAN: Well --

4 JUDGE SEBUTINDE: If this transaction did go through
15:49:53 5 New York.

6 MR KOUMJIAN: It would go through - if it went through
7 Citibank and went through - there's an address given in tab 7, I
8 believe, and that is in New York, New York - the city of
9 New York.

10 JUDGE SEBUTINDE: Because I'm trying to understand
11 Mr Taylor's explanation that these monies did not go through the
12 Central Bank, otherwise they would have been discovered. The
13 reason they didn't go through the Central Bank and went straight
14 to his account or through the Liberian - the LBDI is so that they
15:50:27 15 wouldn't be discovered.

16 THE WITNESS: Yeah. By that I mean, your Honour, the money
17 goes through the Central Bank, the use of that money, with IMF
18 and World Bank individuals there, would be very, very clear. How
19 do you go to the Central Bank because the Central Bank does not
15:50:43 20 physically pay out cash for transactions. They are not involved
21 in the transaction business. So if that money had gone there
22 what Citibank would have done, how that money got out of Citibank
23 the IMF individuals would have kept a record of it. So what we
24 did was to use - what LBDI was used as was as the clearing house
15:51:03 25 of the Government of Liberia. So we used LBDI instead for the
26 money to go to LBDI, thus bypassing the information into the
27 Central Bank system in Liberia.

28 MR KOUMJIAN:

29 Q. Mr Taylor, are you trying to tell us that the Central Bank

1 of Liberia is incapable of making disbursements?

2 A. The Central Bank of Liberia is not responsible for
3 disbursements. That's not the function of the Central Bank.
4 Ours didn't do it.

15:51:41 5 Q. The Central Bank and the Ministry of Finance would take
6 revenue from the Government of Liberia, from the taxpayers and
7 the people of Liberia, and according to the budget passed by the
8 legislature they would allocate it to various ministries and
9 those ministries would have spent it according to the
10 legislation, correct?

11 A. That's incorrect.

12 Q. Tell us how it worked.

13 A. You should have asked me before now. You have - you've
14 jumped over [indiscernible] - it doesn't work that way. In the
15:52:12 15 first instance, a budget is an estimated amount done by the
16 government. Monies that are approved by the budget are only
17 approved by the - they are approved by the legislature for the
18 disbursement around in various ministries and agencies. You have
19 again another tier. The second tier is that you may have the
15:52:36 20 budgeted amount but you have to wait for collections before you
21 have the appropriation for certain amounts and then the
22 disbursement.

23 So, for example, you may have budgeted in January to spend
24 \$4 million and you get maybe \$2.5 million in. That's not a
15:52:55 25 function of the Central Bank any more. The budget bureau of the
26 Republic of Liberia and the Ministry of Finance are responsible.
27 The budget bureau does the allotments based on the appropriations
28 and collectables and then the Ministry of Finance transact all of
29 things. I don't see - I haven't gone through your bundle but you

1 have in the bundle given us a copy of the transaction that
2 occurred at the Ministry of Finance in dealing with some of these
3 deposits.

15:53:30 4 Q. Mr Taylor, the Central Bank collects revenue, you've told
5 us that before. Isn't that true? The Central Bank collects all
6 revenue for the Republic of Liberia?

7 A. No, the Central Bank keeps revenues. Revenue collection is
8 not a function of the Central Bank. It keeps the money.

15:53:44 9 Q. The money goes into the Central Bank. That's required by
10 the law, correct; all revenues go into the Central Bank?

11 A. That's required by the law. But when the legislature
12 passes an Act authorising the President to act, that's the
13 budgetary law, one law can trump another law.

15:54:08 14 Q. This money from Guus Kouwenhoven and the Republic of China
15 did not go through the Central Bank, correct?

16 A. It did not go through the Central Bank. That is correct.

17 Q. And your explanation for that is because it's a covert
18 account?

15:54:25 19 A. I have given an explanation. I told you that going through
20 the Central Bank the IMF and World Bank would have wanted an
21 accounting for the expenditure as they try to do and we took it
22 through another source to be able to carry out the operations as
23 I as President of Liberia was charged to do.

15:54:37 24 Q. Are you telling us today that this account that we've been
25 talking about at LBDI was a covert account?

26 A. Mr Koumjian, what do I tell you again? I've said it a
27 million times. That account - when you say covert, was it a
28 covert account, in that sense I would say no. Was it used for
29 covert activities? Yes.

1 MR KOUMJIAN: If the witness could be shown from 26
2 November, I hope this reference is correct, page 32321. Is it
3 the wrong reference? Page 32522.

4 PRESIDING JUDGE: Yes, Mr Taylor has that.

15:56:24 5 THE WITNESS: Yes.

6 MR KOUMJIAN: Thank you:

7 Q. Mr Taylor, you were asked several --

8 A. What line, counsel?

9 Q. Line 3. I asked you:

15:56:47 10 "Q. Mr Taylor, what was the source of funding for your
11 covert budget?

12 A. The taxpayers of the Republic of Liberia."

13 That wasn't true according to your current testimony,
14 correct?

15:57:00 15 A. That was true. Mr Koumjian, that was as true as it could
16 be. Mr Koumjian, major western intelligence agencies sell drugs
17 to fund intelligence activities. When they ask them they tell
18 them - that say we sold drugs to get it? Listen, you know, this
19 is why you have to keep politics out of courts. I'm asked a
15:57:17 20 question and I'm trying to be very earnest to these judges and
21 tell them - you ask how do you fund the budget? The budget is
22 funded by the taxpayers of Liberia. Now if this money coming in
23 is that a part of the budgetary funding is another question. But
24 the budget is funded by the taxpayers, although you have foreign
15:57:36 25 assistance and other things, but that's how you fund the budget.

26 Q. Sir, the specific question was a source of funding for your
27 covert budget. Is the embassy of Taiwan a taxpayer of the
28 Republic of Liberia?

29 A. No, they are not, Mr Koumjian.

1 Q. By the way, Mr Taylor, what is the source of your knowledge
2 about drug activity by intelligence agencies?

3 A. As much as you know. What I have read, that some
4 intelligence agencies - all kinds - most of intelligence funded
15:58:08 5 is not just from budgets mentioned. All kinds of activities go
6 into - some people had - they have shares in corporations. They
7 do a lot of things.

8 Q. Mr Taylor, if we could look behind tab 13. First perhaps
9 the tab that we were looking at previously, the first seven pages
15:58:30 10 of tab 12 could be marked for identification.

11 PRESIDING JUDGE: Yes, the first seven pages will be marked
12 as one document, MFI-314.

13 MR KOUMJIAN:

14 Q. Perhaps before I leave that, just for the sake of
15:59:04 15 completion, Mr Taylor, if you go to the last - the seventh page
16 of tab 12?

17 A. Tab 12. Did you say page 7?

18 Q. Yes, the printout says at the top page 4 but it's the
19 seventh page into the bundle. First let me ask you, there
15:59:44 20 appears to be on 19 July 2001 three or four transactions, the
21 first four transactions?

22 A. Wait a minute now. Did you say tab 12?

23 Q. Yes, sir. Tab 12, the seventh page in - the first date is
24 19 July 2001?

16:00:23 25 A. Yeah. Okay.

26 Q. You see at the top for 19 July, there's a whole series of
27 transactions, but the first four appear to be substantial and the
28 others are debit/credit charges. We see that the first line, and
29 there's a debit of \$50,000 cash/cheque. Then there's a \$450,000

1 debit and then a \$450,000 credit and the indication is reversal
2 of cheque deposit into GOL. And then --

3 A. No. You say into?

4 Q. INTDGOL.

16:01:06 5 A. Well, that's not "into".

6 Q. What's INT --

7 A. It means something different, but it sure doesn't mean
8 "into".

9 Q. Okay. And then you see another debit, 450,000 cheque
16:01:23 10 DEPIFO, GOL tax. What were these transactions, sir?

11 A. I don't know. I don't know. I see GOL tax, I'm sure it's
12 coming from the Finance Ministry. I see another GOL at the top,
13 it's got to be some Finance Ministry, you know, dealing with some
14 of this money, so - but once you see GOL, it simply means that,
16:01:46 15 again, I think this brings to home the point that this
16 information and what is going on is actually being done with the
17 knowledge of more than just Charles Taylor.

18 Q. Sir, the very last transaction, 29 October 2003, this would
19 be after you've left Liberia, correct?

16:02:08 20 A. 29 October - by "last transaction" --

21 Q. The bottom of this page, the page we were just looking at,
22 the last line.

23 A. Yeah, I see.

24 Q. And there's a \$3,542.12 debit and that zeros out the
16:02:32 25 account. It indicates "repayment against D/D, LIB for Jesus".
26 What is that, do you know?

27 A. Yes. Liberia for Jesus was the National Prayer Service
28 Programme sponsored by the Government of Liberia while I was in
29 office, Liberia for Jesus, where we had pastors from the United

1 States and all that came down. Benny Hinn couldn't come. He
2 sent - and this is it. But this is after - I'm not in office,
3 but apparently - I don't know who transacted this. It could have
4 just been a bank, because you can see, as you readily say, the -
16:03:19 5 that's not the real major transaction. The last major
6 transaction in this account occurred actually in July 2001. You
7 see over there, 450,000. So these other things, I think this is
8 just - you look at monthly service charges and maybe an action on
9 the part of the bank, because there's hardly anything left in the
16:03:44 10 account. But the last transaction ended in 2001.

11 Q. Mr Taylor, when you got - received money, for example, from
12 Guus Kouwenhoven, into this account, he received a receipt for
13 taxes paid, correct?

14 A. Oh, his account was credited at the Finance Ministry, that
16:04:08 15 is correct.

16 Q. So taxes that should have gone to the Ministry of Finance
17 and the Republic of Liberia from timber were going to your
18 personal account, correct?

19 A. But how - no. How can you say that monies went to the
16:04:23 20 Finance Ministry were received, were issued, and then you say
21 taxes that should have gone to the Finance Ministry. Of course
22 they went to the Finance Ministry. These were not secret
23 transactions. The Finance Ministry and the appropriate official
24 was aware that a special account was set up at LBDI to take care
16:04:42 25 of certain government transactions as authorised by our
26 legislature. Now, we may disagree but that's our legislature and
27 we acted accordingly.

28 Q. You are saying your legislature authorised you to set up a
29 personal chequing account - -

1 A. That's not what I said.

2 Q. -- to receive tax - let me finish the question - to receive
3 tax revenue?

4 A. That's not what I said. During the crisis in December
16:05:04 5 1999, the legislature about that time or thereabouts passed a
6 bill authorising the President of Liberia to use, in the exact
7 words of the Legislature, "any and all means to make sure the
8 republic was protected". We had had two attacks from LURD and
9 LURD was penetrating the country deeply. We had an arms embargo
16:05:25 10 on us we could not get around. The legislature told me to use
11 any and all means. I did, and I reported to the appropriate
12 people what was going on. Through that in 2001 I'm telling the
13 world we bought arms. This was not personal. It was not my
14 personal account. If it had been, I would not have permitted
16:05:44 15 another government official to sign it that's not my wife or my
16 lover or nothing. This is official. Now, we may have all of our
17 different interpretations, but it remains the fact of the matter
18 it was not a personal account of Charles Taylor.

19 Q. Sir, December 1999 did LURD even exist with that name as an
16:06:06 20 organisation?

21 A. No, not that I know of. It came as Mosquito Spray, but
22 let's not forget they were - there had been an initial attack and
23 there were attacks in - don't let's forget by April,
24 Mr Koumjian - by April, when the RUF and the international
16:06:28 25 community is hosting the peace agreement in Lome, what's
26 happening by that time that you took me through in
27 cross-examination the other day? There are two attacks in 1999.
28 I think one is in August and the other is in April, and you took
29 me through that, Mr Koumjian. The country is at war. This is

1 our remedy.

2 Q. April there's an attack on Voinjama; and August there's the
3 Mosquito Spray incident; correct?

4 A. 1999, and we opened this account in December.

16:06:56 5 Q. That attack on Voinjama was one day; the attack Mosquito
6 Spray was a couple of days, correct?

7 A. Mr Koumjian, war is war. We are at war. After the second
8 attack they are hardly driven out. From August they were still
9 fighting, so --

16:07:13 10 Q. Mr Taylor, if we now go behind tab 13. And just so no one
11 is deceived, this is simply a spreadsheet that I created
12 totalling figures from other pages. Let me explain where the
13 figures come from. If we look at the monthly summaries which are
14 complete in tab 10 and in tab 5 has some of them, but tab 10,

16:07:56 15 you'll see the first seven entries, where I got these figures
16 from. These figures are taken from the credit amounts for the
17 months from these monthly summaries. So \$917,243 for December
18 '99; \$6,905,500 for March 2000; \$1,393 for May 2000; \$25,000 for
19 June 2000; \$1,999,975 for July 2000; \$493,250 for August; and
16:08:52 20 half a million dollars for September. The total for those nine
21 months, Mr Taylor, \$10,842,268.93.

22 If we then add the three transactions that we --

23 JUDGE SEBUTINDE: Credits or what are they?

24 MR KOUMJIAN: These are the total of the deposits, the
16:09:13 25 credits for the monthly summaries:

26 Q. If we then look at the final three figures are taken from
27 the three transactions - credit transactions I went through --

28 PRESIDING JUDGE: There's an objection. Yes, Mr Griffiths?

29 MR GRIFFITHS: I'm sorry to interrupt, but I'm slightly

1 concerned about the procedure being adopted here because
2 effectively what we have is Mr Koumjian, who is not a witness,
3 giving evidence as to the creation of this document.

16:09:44 4 PRESIDING JUDGE: That's precisely what he is doing. We
5 haven't adopted any procedure at all.

6 MR GRIFFITHS: But it seems to us that it would be more
7 helpful if he elicited the information on this page through the
8 witness, then we can see how this document came to be created.
9 It seems it's through the mouth of the witness, not Mr Koumjian,
16:10:04 10 that we see how we arrive at these figures.

11 PRESIDING JUDGE: Mr Koumjian?

12 MR KOUMJIAN: Your Honour, this document is simply
13 totalling the credits from previous documents. It's for the
14 convenience of the Court, the witness and Defence counsel to see
16:10:24 15 how all of these add up and the total figure. Clearly, I'm not a
16 witness, but these - as I'm explaining where I took them from.
17 They are taken from the banking records of the other
18 transactions. It's simply a summary document of what's contained
19 in different places in the documents. If your Honours do not
16:10:44 20 find it helpful to get this total, we don't have to use it. But
21 I thought it would be helpful to everyone to see these figures
22 totalled.

23 JUDGE SEBUTINDE: Mr Koumjian, the trouble is if
24 cross-examination or re-examination has to be done, you are
16:11:04 25 answerable for these documents, not Mr Taylor, and how is that
26 going to happen?

27 MR KOUMJIAN: I'm trying to explain where each of these
28 came from a different document. I'm not testifying. They come
29 from a different document --

1 JUDGE SEBUTINDE: I'm saying, should there be disagreement
2 with you. To take a very easy point: I was asking you if you
3 made this document why you didn't put a heading "credits" or
4 "total credits". I don't know what they are, and the document is
16:11:35 5 just a set of figures. And we may - in passing, we may go back
6 and add and it may not add up as you have added it up. That may
7 be. But in case any issues arise out of this document, are you
8 going to give evidence?

9 MR KOUMJIAN: Of course, there's no reason for me to give
16:11:54 10 evidence. This is simply from the other documents. If your
11 Honours believe it amounts to testimony, then I'll withdraw it
12 and I'll simply ask Mr Taylor about - put it to him. And I'll do
13 that, given the comments from the Bench:

14 Q. Mr Taylor, if we take the amount that is in these summaries
16:12:17 15 from the LBDI documents, what we have in total for nine months,
16 from December '99 to December 2000, I'm putting it to you,
17 \$10,842,268.93 was deposited into this account. Let me just
18 complete the question. Then we have three additional deposits
19 we've gone through this afternoon during your testimony: 4
16:12:46 20 December, 10 January 2001 and 19 April 2001. They, in total, are
21 \$3,650,000, for a grand total, from December '99 to April 2001,
22 of \$14,492,268.93, once more the number: \$14,492,268.93. Sir,
23 all of this money was deposited into an account, LBDI account, in
24 the name of Charles G Taylor, correct?

16:13:36 25 A. I disagree. I disagree. In fact, I don't know what this
26 document is, but I disagree because I have not even - I don't
27 know the purposes or the - all of the origin of these figures, so
28 I disagree.

29 MR KOUMJIAN: Your Honour, I've completed my questioning on

1 these documents and I don't intend to put any further documents.
2 I believe all that I've used - I'm not going to ask that that
3 last document be marked for identification, given the comments -
4 have been marked for identification. So the Prosecution has
16:14:42 5 completed this topic.

6 MR GRIFFITHS: Mr President, I wonder if I can inquire
7 whether that means that so far as all the other documents not
8 marked for identification in this bundle is concerned, that the
9 Prosecution have no intention of placing any reliance on them
16:15:02 10 either now or at any future stage.

11 MR KOUMJIAN: Your Honour, we're not going to give
12 indications that we will never refer to other documents. Things
13 will come up in cross-examination, we don't know what Mr Taylor's
14 answers will be. So I'm not prepared to say that we will never
16:15:21 15 use any of the other documents in the bundle that were not
16 referred to.

17 PRESIDING JUDGE: That's your answer, Mr Griffiths.

18 MR GRIFFITHS: I'm grateful.

19 PRESIDING JUDGE: The Prosecution is still cross-examining,
16:15:58 20 but would I be correct in saying that, in view of the orders this
21 morning, there's nothing that the Prosecution has to put up in
22 cross-examination at this stage?

23 MR KOUMJIAN: That is correct, your Honour, given the
24 issues of the document disclosure.

16:16:19 25 PRESIDING JUDGE: And disclosure --

26 MR KOUMJIAN: And, quite frankly, your Honours understand
27 the move is upon us. We have a tremendous task frankly ahead of
28 us to complete with everyone going on vacation - to comply with
29 the orders this morning. So frankly that will be a very

1 full-time task for the rest of this week.

2 PRESIDING JUDGE: Yes. Mr Griffiths, do you have any other
3 matters you would like to mention? It's going to be a rather
4 long adjournment this time.

16:16:51 5 MR GRIFFITHS: [Microphone not activated].

6 PRESIDING JUDGE: Thank you. Mr Taylor, we're going to
7 have to adjourn now and I'll just remind you of the standing
8 order not to discuss your evidence with any other person. We
9 will adjourn now until Monday, 11 January at 9.30.

16:17:24 10 MR GRIFFITHS: Mr President, before everyone leaves can I
11 take the opportunity to wish everyone a merry Christmas on behalf
12 of the Defence.

13 PRESIDING JUDGE: Thank you very much, Mr Griffiths. On
14 behalf of the Bench we reciprocate those very kind sentiments.

16:17:40 15 MR GRIFFITHS: Thank you very much.

16 [Whereupon the hearing adjourned at 4.16 p.m.
17 to be reconvened on Monday, 11 January 2010 at
18 9.30 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

DANKPANNAH DR CHARLES GHANKAY TAYLOR	33035
CROSS-EXAMINATION BY MR KOUMJIAN	33035