

Opening Statement Part II

Abdul Tejan-Cole

Introduction

Today, the name Sierra Leone conjures images of brutality: mutilation, abduction, rape, murder, children with guns sometimes bigger than themselves. The RUF, in its decade-long desire for political control of the land and its unquenchable and gluttonous thirst for diamonds and the arms they bought, was the chief architect of this brutality.

Make no mistake. This brutality was not a mere happenstance of the conflict that gripped Sierra Leone throughout the 1990s. It was not a by-product of military combat. The RUF and its commanders were not fighting a just war. No reference to the theology of St. Thomas Aquinas, or to the seven principles of just war drawn from it, will mask its brutality. This brutality was intended. It had purpose. It was designed. The RUF took aim and launched a campaign of terror directed against the innocent unarmed civilians of this country.

That terror had certain macabre signatures. Systematic amputation. The herding of frightened and crying people into groups to be murdered en masse. Repeated, relentless sexual violence. Men, women and children forcibly taken by RUF soldiers from their villages and homes. The carving of the initials – R. U. F. – into the chests and foreheads: the very skin, sinew and muscle of this country's youth.

These macabre signatures of RUF brutality will be repeated time and time again throughout the evidence that will be given before this court.

That evidence will cover Seven Districts of Sierra Leone.

- Kono
- Bo
- Kenema
- Kailahun
- Koinadugu
- Bombali
- Port Loko

And

- Freetown and the Western Area.

The similarity of the stories from all parts of the country will become hauntingly familiar.

The witness from Kono who heard the screams of 25 people burned alive by rebel forces in Penduma village will echo in the evidence of the witness from Koinadugu who saw people rounded up and burnt alive in his village. The testimony of both these witnesses will resound in that of the witness from Port Loko who will describe the 73 innocent and helpless people burned alive in a house in Manaarma, and again in the testimony of the many witnesses from Freetown who saw families die together in the flames of their houses.

Within these court room walls the terrifying words “Go to Kabbah” “Go to Kabbah” will reverberate again and again and again. “Go to Kabbah.”

These words were said by thousands of rebels to thousands of Sierra Leonean men, women and children, the vast majority of whom have never met, who have never seen or did not even know the President of Sierra Leone. “Go to Kabbah,” These words were said by rebels as the blood of the people of Sierra Leone dripped from their blunt and crude machetes, cutlasses, axes and swords, and the chopped-off hands and limbs of the people lay severed on the ground. “Go to Kabbah.”

Witnesses from Kono, Koinadugu, Bombali, Freetown and Port Loko will all tell a similar harrowing tale of vicious and primitive amputation by rebel forces. The RUF decided upon amputation as punishment for civilians whose only crime was to support democracy.

Left faint or unconscious, left vomiting and in agony, and simply left to die, the RUF told these people to go to Kabbah for new hands.

In fact, the evidence will show that it did not matter which government the citizens of Sierra Leone supported. Amputation was a tool of fear systematically used by the RUF to terrorize the population into submission.

This court will also hear the evidence of girls and women who were subjected to sexual violence and sexual slavery; the unmistakably atrocious and ghastly signature of RUF violence.

The evidence of the teenager from Kono who was publicly raped by eight rebels and was so badly injured that she bled for three days, has terrible parallels with that of the witness from Koinadugu who was pregnant but miscarried after being publicly raped by three rebels. The Prosecution will invite this chamber to juxtapose these stories with the gruesome account of the witness from Freetown who was taken to Waterloo, raped by seven rebels and saw another girl abandoned by her captors because she had been gang-raped to the point where she could no longer walk.

Ample evidence, your Honours, will be adduced before this Chamber of girls from Freetown who were abducted and held by retreating rebels and used and abused on a daily basis as the sexual slaves of their captors. These were not isolated incidents. This did not only happen in Freetown. Indeed if the rebels could do it Freetown, where the world was watching, they could do it everywhere in Sierra Leone.

Evidence adduced before this Court will show the same pattern of RUF behaviour in Bombali, Koinadugu, Kono, Kailahun and Port Loko.

These and other patterns of violence, of brutality, of criminality that will be traced through the evidence, will show that the crimes committed by the RUF were planned and had method. The finding of these patterns in the behaviour of the RUF throughout the territory of Sierra Leone is significant. These patterns will show that the RUF High Command, and in particular the three Accused Sesay, Kallon and Gbao, before this Court, not only knew of, but condoned these crimes. They ordered the rebel troops to commit these atrocities against the civilians of this country.

Your Honours, I reiterate once more, the patterns will be found and the stories will become easily recognisable because there are so many of them. It is crucial that this does not obscure one extraordinarily simple, yet critical point.

That is this.

These crimes were committed upon individuals. Every single witness who will come to this court will tell of the brutality that they endured. The rape victim from Koinadugu must, your Honours, I emphasise, not be mistaken for the rape victim from Kono. The 73 people who were burned alive in Manaarma must not, your Honours, be confused for the 25 people burned alive in Penduma village. The amputee from Freetown, your Honour, is distinct from the amputee from Port Loko.

The stories may be familiar, they will reveal a similar pattern, but they are not the same. The pain that each endured cannot be the same.

The first witnesses who will be called in this trial will demonstrate both pattern and individual difference. Drawn from all over Sierra Leone, their evidence will reveal the design of RUF terror and cruelty. Their evidence will also establish that it was the innocent individual citizens of Sierra Leone that suffered the terrible consequences of that terror and brutality.

This trial will provide history with a record of the organised terror that the RUF unleashed upon citizens of Salone and the responsibility of the three RUF commanders, Sesay, Kallon and Gbao, who stand indicted before this Court for that terror. It will also be a legacy to the bravery of individual Sierra Leoneans who are willing to relive their individual terror and tell their story in front of this Court and the world.

RUF History

Your Honours, the rhetorical question one may ask at this stage is: who are the RUF? And why did they unleash a campaign of terror in Sierra Leone?

Founded in about 1989, the RUF was led by Corporal Foday Sabayana Sankoh, alias Popay, alias Pa. But he did not act alone. He had the help of other insurgents he met in training camps in Libya and Burkina Faso. The most important of these was the war crimes indictee, Charles Ghankay Taylor.

Though now a fugitive from justice, Taylor was, in the mid 1980s, an official in the government of the then-Liberian President Samuel K. Doe. He was Accused of embezzlement and fled to the United States. There he was arrested and detained pending extradition to Liberia. He joined a group of Liberian exiles determined to overthrow Samuel K. Doe's government. Moving between Burkina Faso and Libya, this group crystallized as the

National Patriotic Front for Liberia or the NPFL. The Liberian civil war began in December 1989.

Foday Sankoh, leader of the RUF, travelled to Liberia and assisted both Charles Taylor and the NPFL. In turn, Charles Taylor assisted Sankoh as he began the military training of Sierra Leonean refugees and expatriates in Liberia. Sankoh's aim was to overthrow President Joseph Saidu Momoh's one-party dictatorship and gain power of Sierra Leone. One of Taylor's objectives was to retaliate against Sierra Leone for its support of ECOMOG in blocking the NPFL from taking control of Liberia. Both Taylor and Sankoh needed to gain access to the rich diamond mining areas of Sierra Leone to bring their objective to fruition. So, in March 1991 the RUF entered Bomaru in the Kailahun District of Eastern Sierra Leone from Liberia. The campaign of terror had begun.

The RUF is a Military Organisation

From the very outset the RUF was a military organisation, with a clearly defined structure and chain of command. Leadership, decision making and control rested with those at the top of the chain of command. Target Commanders answered to Battalion Commanders who answered to a Battle Group Commander who answered to a Battle Field Commander. Individuals held military titles: Major, Colonel, Brigadier, and even General.

NATO-like nomenclature was adopted for its functional branches. The G4 was in charge of logistics. The G5 was in charge of the "sensitising" of civilians. A People's War Council was established. Its role was to plan the RUF military strategy. It always met before a major offensive was launched.

Fighting forces were organised. Special Forces, who had trained with Sankoh, were superior to Vanguard, who had trained in Liberia. Vanguard were superior to Junior Forces, who had trained in Sierra Leone. Targets with names like Bronze Warriors, Jungle Warriors, and Alligator Forces were established within Battalions. And these battalions fought along axes.

Training camps were set up. This court will hear the names, such as Camp Lion, Camp Superman, Camp Rosos and Zimmi Camp. At these camps men, women and children who had been captured from their villages were given not only military training but ideological indoctrination. For the RUF did indeed have pretensions to ideology. Sankoh wrote a manifesto called

Footpaths to Democracy. The RUF even had an anthem which was sung every morning. Four verses interspersed with a chorus.

*RUF is fighting to save Sierra Leone
RUF is fighting to save our people
RUF is fighting to save our country
RUF is fighting to save Sierra Leone*

The evidence will show that the RUF was not fighting to save Sierra Leone. It was fighting to take control of Sierra Leone.

*Chorus: Go and tell the President, Sierra Leone is my home
Go and tell my parents, they may see me no more
When fighting in the battlefield I'm fighting forever
Every Sierra Leonean is fighting for his land*

The RUF did send people with messages to the President. But only after they had amputated their arms and limbs. The messages were of terror.

*Where are our diamonds, Mr. President?
Where is our gold, NPRC?
RUF is hungry to know where they are
RUF is fighting to save Sierra Leone*

The evidence will show why the RUF was hungry to know where the diamonds and gold were. It will show how the RUF accounted for our minerals and how they made the people of Sierra Leone “enjoy” their land.

*Our people are suffering without means of survival
All our minerals have gone to foreign lands
RUF is hungry to know where they are
RUF is fighting to save Sierra Leone*

The evidence that will be adduced before this Court will show that the RUF took our minerals to foreign lands and exchanged them for arms and ammunition. These arms and ammunition, your Honour, were used to exacerbate the suffering of our people.

*Sierra Leone is ready to utilise her own
All our minerals will be accounted for*

*The people will enjoy their land
RUF is the saviour we need right now*

The RUF was no saviour. They failed to account for the minerals they mined and the properties they looted. Their thirst for diamonds, and for the arms they could buy, meant that the RUF did not walk Footpaths to Democracy. They trampled democracy underfoot.

Dramatis Personae of the RUF

Who were the people that made up the RUF, who were so hungry for the gold and diamonds, who ran roughshod over democracy? Three of these people stand indicted in this Court today.

Issa Hassan Sesay. RUF Area Commander. RUF Battle Group Commander. RUF Battle Field Commander. RUF Interim Leader.

Morris Bilai Kallon. Deputy Area Commander. Battle Field Inspector. Battle Group Commander. Battle Field Commander.

Augustine Gbao. Commander of the RUF Internal Defence Unit. Overall Security Commander. Area Commander.

These three men were senior commanders with the RUF. They planned, ordered, witnessed and participated in the criminal activities of the RUF. They are responsible for these crimes. For what they did personally, for what other commanders did, and for what their subordinates did.

The evidence will show that the first Accused Sesay was in Kono between February and September 1998 and again from 1999 onwards, when he was the mining commander of the RUF and personally collected diamonds which were then exchanged for arms and ammunition. As such he requested that a 24-member Small Boys Unit be prepared for him. The evidence will show that he always had a SBU with him. In Koidu he addressed a meeting of civilians who had been captured and brought to Kono to mine diamonds for the RUF. He told them that any one who did not cooperate would be punished. The punishment ranged from flogging to execution.

Sesay was present in Kailahun when about 60 civilians, Accused of being Kamajors, were executed by his subordinates.

In Kenema in October 1997 Sesay, on the orders of Bockarie, arrested and severely assaulted a civilian with a firearm.

Sesay led attacks on Koidu and Makeni as the offensive that culminated in the invasion of Freetown intensified. The evidence will show that he used child soldiers in these attacks in which civilians were brutally murdered, maimed and raped.

Sesay organized retreat forces from Freetown. At Masiaka following the 1999 retreat, captured women complained directly to him that they had been raped by rebels. His response was that the rebels were their “husbands” and they therefore had nothing to complain about.

Issa Hassan Sesay ordered the arrest of UN personnel in Kailahun and ordered Morris Kallon to mobilize men to attack the Kenyan peacekeepers in Magburaka. He supplied ammunition for the attack. He ordered that the Zambian peacekeepers detained in Makeni be transported to Kono. He addressed the men in transit, telling them that the UN and white men were to blame for the problems in Africa, that his men were ready to fight the UN. Sesay said “I could have killed all of you and nobody would question me.”

The time for questions has now arrived.

The second Accused Morris Kallon alias Bilai Karim used child soldiers in attacks he led, including on Koidu Town and in Lunsar. He attempted to prevent the repatriation of 90 child combatants from Makeni to Freetown. He oversaw the use of civilian labour in the mining fields. He broke into the National Development Bank in Bo in 1998 and looted all the money. He killed a civilian in Kono over a sheep. He was present in Tombodu Town when civilians were killed by rebel forces. He was present in Koidu Town when civilians were tied up and shot. He participated in the attack on Makeni that was part of the offensive that culminated in the invasion of Freetown, and led reinforcements to Freetown. He organized retreat forces from Freetown. Kallon threatened peacekeepers at the Makeni DDR Camp. He abducted UN Military Observers and attacked Kenyan Peacekeepers.

The third Accused, Augustine Gbao, was a senior RUF commander in Kailahun. He controlled its civilian population and RUF fighters. He ordered the various Chiefs to congregate before him and gave them orders to provide materials and civilians for use by the RUF. He used captured civilians to

carry ammunition from Buedu to Pendembu and Mobai. He was present when women and girls were brought to Kailahun, raped and forced to marry RUF fighters. Gbao was present when 60 men, Accused of being Kamajors, were killed in Kailahun.

Gbao's influence extended beyond Kailahun. He was head of the Internal Defence Unit of the RUF and had children as young as 10 and 11 trained with guns at a camp in Bunumbu. At the end of the conflict he was involved in the negotiation for the release of children and ordered his subordinates to kill staff members of Caritas after children had been released. He also threatened death to children who had been released. He attacked the UN peacekeepers at Magburaka and read a "charge sheet" to the captives justifying his actions. He was present at the Makeni Hospital when the Milobs were taken and one was killed.

Of course other RUF commanders also bear the greatest responsibility. Charles Ghankay Taylor stands indicted, but temporarily hides from justice in Calabar, Nigeria. Foday Sankoh is dead. Sam Bockarie – Mosquito – is dead. But the role they played, their dreadful deeds, as alleged in the indictment, will be recorded in this trial.

Foday Sankoh, the leader of the RUF. He ordered the capture and training of children to fight because, once again, they are loyal and show no fear. It is because of him that today there are some children and young adults who do not know their real names, their villages or their parents.

Sankoh. The man who signed peace accords while arming his soldiers and planning attacks. Sankoh. The author of Footpaths to Democracy who wanted to sabotage democratic elections by ordering his soldiers to amputate the hands of people who voted. Sankoh's control was such that he could still order his troops even when detained in Nigeria. From outside Sierra Leone, his order that the RUF join the AFRC was obeyed without question.

Sam Bockarie. Mosquito. Maskita. The name brings on the cold sweat and feverish shivers usually associated with the deadly malaria disease down the collective spine of the Sierra Leonean population. It is no wonder. He was everywhere, biting and sucking the life blood from this country.

In June 1997 he led attacks in Bo District. Bo was under control of the CDF for large parts of the conflict. Prior to the attacks the rebels announced that

that the harbouring of Kamajors would not be tolerated. Dozens of civilians were killed in Sembahun, Tikonko, Mambona, Gerihun and Telu. The civilians killed included the beloved and blind Chief Albert Sani Demby, Paramount Chief of Baoma Chiefdom and the father of the former Vice President of Sierra Leone.

In Kenema, prominent civilians accused of supporting the CDF were arrested and tortured. One of them, B.S. Massaquoi, a former Government Minister, was arrested, tied up and savagely beaten by Mosquito. Mr. Massaquoi was released but later Mosquito threatened that the Kenema Police Station would be burnt to the ground if he was not rearrested. Mr. Massaquoi and five others were then tortured and killed. Witnesses before this Court will tell of the wounds they observed on the body of Mr. Massaquoi while he was in custody and of seeing his beaten corpse and other corpses in a mass grave.

When the first AFRC Accused Gullit was in Freetown in January 1999 giving orders for the wholesale spreading of terror from State House, the other AFRC Accused Brima Bazzy Kamara and Santigie Kanu, 55, were in State House with him. Sam Bockarie may not have been physically present but, from Kailahun, he was directing the horror.

When Mosquito ordered Operation No Living Thing he announced to the world:

“I am a ruthless commander. I am ready to damage but I am waiting until something happens to Sankoh. When I take Freetown I shall clear every living thing and building. To my God, I’ll fight. I’ll kill and kill, and the more they tell me to stop, the more I’ll kill.”

“I am a ruthless commander. I am ready to damage but I am waiting until something happens to Sankoh. When I take Freetown I shall clear every living thing and building. To my God, I’ll fight. I’ll kill and kill, and the more they tell me to stop, the more I’ll kill.”

These men dead and alive, in this courtroom or hiding in Nigeria, are responsible for every single murder, every single amputation, every single rape, every single beating, every single burnt house, and each body marked with the terrible letters R-U-F or A-F-R-C, the suffering of every woman

forced to become the “wife” of one or more of her captors and every single person forced from their home and made to carry goods or mine diamonds.

It does not matter that their subordinates fired the bullets, wielded the machetes, stole the goods or raped the women. These men were in command, in control, and failed to stop their subordinates in this orgy of terror. Mosquito declared “I am a ruthless commander. I am ready to damage.” They all were.

Post-30 November 1996

In the pursuit of power and control of the country, the RUF committed the crimes alleged in the Seven Districts and the Western Area that form the crime bases of the indictment. The RUF had a plan. Kono had to be controlled. The prize was Freetown.

Kono meant diamonds. Diamonds meant arms. From 1991 to 1996 the RUF sent diamonds to Charles Taylor at NPFL headquarters in Gbanga, Liberia. After Taylor became President of Liberia in 1997, the trade in diamonds intensified. The structures and the players were all in place. Sankoh, the leader, was directing his subordinates and dealing in diamonds with Charles Taylor for arms. Bockarie was the Battle Field Commander. Sesay was the Battle Group Commander. Kallon was the Deputy Area Commander North and Augustine Gbao was the Commander of Kailahun.

Diamonds were brought to White Flower, Charles Taylor’s mansion, first by Bockarie, occasionally accompanied by Kallon, and then by Sesay. Gbao also met with Taylor in Liberia and Burkina Faso.

In return, consignments of AK-47s, RPGs, Uzis and ammunition would be delivered to the RUF in Sierra Leone. Some consignments were brought in by air. Others were brought in by truck. Some were routine shipments of necessary supplies to the RUF fighters.

Control of the North – Koinadugu, Bombali and Port Loko – was central to the RUF military strategy and the jungle groups based in these Districts helped maintain control of Kono. One of the keys to control of Kono was controlling Kailahun. Kailahun in Eastern Sierra Leone was the RUF stronghold from the beginning of the conflict until the end. It served as the corridor into Liberia. It was the home of Gbao from 1997 to 1999. Mosquito was also based there. Sesay and Kallon were regular visitors.

If controlling Kono was a means to an end, that end was Freetown. For the RUF believed that if you control the capital, you control the country. The ultimate Freetown invasion occurred in January 1999, the inglorious retreat through Port Loko to Makeni a few weeks later.

Your Honours, central to this story of the RUF is its union with the AFRC in 1997.

The AFRC – the Armed Forces Revolutionary Council – was formed by some members of the armed forces of Sierra Leone, particularly the Sierra Leone Army, or SLA. On 25 May 1997 the AFRC seized power in this country. The leader of the AFRC was Johnny Paul Koroma. Its other commanders were Alex Tamba Brima – also known as Gullit; Brima Bazzy Kamara – also known as Bazzy; and Santigie Borbor Kanu – popularly known as 55. These are the three Accused in the AFRC trial.

At the time, Sankoh was detained in Nigeria and Bockarie was in *de facto* command of the RUF in Sierra Leone. The evidence will show Johnny Paul Koroma contacted Sankoh by telephone and invited the RUF to join with the AFRC. Sankoh accepted this invitation.

Johnny Paul Koroma made a recording of Sankoh's voice issuing an order for the RUF to join with the AFRC. This recording was played on the SLBS radio in Freetown and via VHF radio to RUF commanders and troops in the field. Within days thousands of RUF soldiers had entered Freetown and major towns. Sankoh also wrote letters to various high-ranking RUF commanders and RUF supporters directing them to join the AFRC and exhorting the two groups to work together.

Thereafter the RUF and AFRC formed a joint Junta force. A governing body – the Supreme Council – was created. It became the sole executive and legislative authority within Sierra Leone. Its members were both RUF and AFRC and included Sankoh, Mosquito, First Accused in this trial Sesay, Second Accused in this trial Kallon, Gullit, Bazzy, Santigie Borbor Kanu and Johnny Paul Koroma.

From May 1997 onwards, the RUF and the AFRC acted jointly. Like any marriage there were occasional difficulties. However these difficulties were not so much between the two groups, as between individuals in the two

groups. These individuals were violent and ruthless men and the difficulties did erupt into violence. But, the RUF/AFRC marriage having been contracted, it was not put asunder by the sporadic squabbling of individual commanders.

The two groups shared a common goal, and shared information and resources. From the RUF base in Kailahun Mosquito sent troops to Rosos, the RUF base in Bombali and home of Gullit, Bazzy and 55. Indeed the marriage was such that certain field commanders who were originally either RUF or AFRC would control combatants who were mixed RUF and AFRC. The combatants dressed alike and were referred to as one, by each other and the population of Sierra Leone. The witnesses who will give evidence in this Court will refer to “Junta”, “rebels” and “People’s Army” when speaking about both RUF and AFRC forces.

This marriage of the two forces bears directly on the criminal responsibility of the three Accused before this court. The RUF and the AFRC shared a common plan to gain control over Sierra Leone. These three RUF high commanders, Sesay, Kallon and Gbao, are responsible for the crimes committed by the RUF and AFRC in pursuit of that common plan. Sesay, Kallon and Gbao are responsible because they knew that these crimes were being committed and did nothing to prevent them. Sesay, Kallon and Gbao are responsible because the fact that crimes were going to be committed was foreseeable.

Sesay, Kallon and Gbao are responsible for the countless murders, rapes and mutilations performed by the faceless AFRC soldiers, as well as for the properties burnt and stolen, and the civilians abducted by them.

Sesay, Kallon and Gbao are responsible for the crimes committed by the senior AFRC commanders: Johnny Paul Koroma, Alex Tamba Brima (Gullit), Brima Bazzy Kamara, and Santigie Borbor Kanu. They are responsible for the civilians killed and abducted on the orders of Gullit as AFRC troops moved from Koidu and Koinadugu. Sesay, Kallon and Gbao are responsible for the people burnt alive in Yiffin during the attack led by Gullit and Bazzy. They are responsible for the human sacrifices ordered by Gullit in Bombali. Sesay, Kallon and Gbao are responsible for the sexual violence done to the three women abducted from Freetown who were forced to become the “wives” of 55 in Masiaka.

Sesay, Kallon and Gbao are responsible for the living hell that was Freetown in January 1999 as civilians were murdered, amputated and raped, as the city was burned and looted, as civilians were abducted and forced to carry loads for the retreating junta forces. They may not have given the physical orders in Freetown to burn and kill. But there were RUF troops and commanders in the city and, from Freetown Tamba Alex Brima was in radio communication with the RUF leadership and receiving direction from Mosquito.

Your Honours, many things happened after the day of the marriage of the RUF and the AFRC.

From May 1997 the Junta force stayed in power in Freetown until forced out by ECOMOG forces on 14 February 1998. Your Honour, 1998 saw the launch of two RUF/AFRC Operations: Operation Pay Yourself and Operation No Living Thing.

Operation Pay Yourself was a command to steal and loot. Food, clothing, money and furniture were stripped from the people by the ravenous rebel forces.

Operation No Living Thing, sometimes called Operation Spare No Soul, needs no elaboration.

A widespread and systematic program of punishing civilians for supporting President Kabbah, ECOMOG or CDF forces was also instituted.

Following the expulsion of the Junta from Freetown in February 1998, the Junta factions regrouped in both Koinadugu and Kono Districts. 1st Accused Sesay and 2nd Accused Kallon ensured that the RUF organised a safe passage for Johnny Paul Koroma to Kailahun. The marriage of the RUF and AFRC was reaffirmed and explicit plans were made to keep control of Kono at all costs.

Crimes and Themes

Throughout all of these areas the same macabre signatures of brutality will be seen as witness after witness tells the court their story. These witnesses, in many different languages, and overcoming many cultural and psychological difficulties will paint this picture. Even making allowances for these difficulties, this picture will clearly emerge.

Counts 1 and 2 – terrorising the civilian population and collective punishments – will be established by viewing the evidence as a whole, but particular features of the evidence are noteworthy.

When soldiers amputate civilians and then tell them to “Go to Kabbah” for new hands or give them a letter for Kabbah, there can be no reasons for the atrocities of the RUF and AFRC other than to instil terror or to punish. When entire villages are burnt to the ground, there can be no reasons other than to instil terror or to punish. When civilians of the same ethnic origin as President Kabbah are killed, maimed and raped, there can be no reasons other than to instil terror or to punish.

Counts 3 to 5 – unlawful killings. The murders committed by the RUF and AFRC also bear their macabre signature. Victims were shot, hacked to death and burned alive. They were often herded together to be killed en masse. Other civilians were often forced to watch.

The evidence will establish that across crime bases in the indictment thousands and thousands of people were killed at the hands of the RUF and AFRC. The method of killing was cruel and shows thought and planning.

Counts 6 to 9 – sexual violence. The sexual violence of the RUF was vicious and endemic. This will be demonstrated throughout the evidence relating to Kono, Koinadugu, Bombali, Kailahun, Freetown and Port Loko. Gang rape. Sexual Slavery. Forced marriage. Often accompanied by other physical violence, these crimes left deep wounds, both physical and psychological.

Counts 10 and 11– physical violence. The damage done to the very bodies of the civilians of this country is perhaps the most notorious of the RUF signatures of violence. The reason for the amputations and carving of initials on chests and foreheads is almost unfathomable.

Count 12 – child soldiers. Thousands of children were abducted from all over Sierra Leone and forced to undergo training at RUF and AFRC camps. They were indoctrinated, drugged and often given new names. Organised into Small Boys Units and Small Girls Units they were forced to carry ammunition, take part in military attacks and to participate in the criminal activities of the rebel forces.

This court will hear the evidence of people who saw the child soldiers and also from former child soldiers themselves. They killed, they amputated, they burned properties and they raped.

Count 13 – Abductions and Forced Labour. Although not as enduringly visible as the amputations and sexual violence, the abduction of people and the use of these people as labour were just as pernicious.

The evidence will show that thousands of people from Kenema, Kono, Koinadugu, Bombali, Freetown and Port Loko were forcibly taken from their homes and made to work for the RUF and the AFRC.

Count 14 – Looting and Burning. Operation Pay Yourself. Can there be a clearer direction to loot, your Honour?

Counts 15-18 Attacks on UNAMSIL Personnel. Between April and September 2000 the RUF attacked UNAMSIL peacekeepers and humanitarian assistance workers who were there on behalf of the international community to help restore peace following the Lome Peace Agreement of 7 July 1999.

Radio communication between the Accused Kallon and Sesay and Foday Sankoh resulted in Sankoh ordering the arrest of UNAMSIL personnel. Kallon threatened the peacekeepers at the Makeni DDR Camp that the camp should be dismantled within 72 hours.

Presentation of Case

The Prosecution case will be presented as follows.

The first witnesses will be called to demonstrate the nature of the crimes committed and the geographic spread over which they were committed.

The next witnesses will be a few of the “insiders” – those who can explain the history and structure of the RUF and the place of the three Accused within it. These witnesses who will give evidence about the structures and methods of the RUF come from the core of the organisation. Former soldiers and commanders, they saw and participated in the activities of this group.

The Prosecution will then move through the crime bases in the following order: We will start with Kono, then Bo, Kenema, Kailahun, Koinadugu,

Bombali, Freetown and Port Loko. As the evidence for each crime base is presented, the court will hear evidence from men, women, “insiders” and former child soldiers.

Interspersed between the crime bases will be the evidence of expert witnesses.

The Prosecution will then present concentrated evidence relating to count 12, the conscription of child soldiers. The court will hear further testimony of former child soldiers and child victims.

Finally, the Prosecution will present evidence relating to counts 15 to 18, the attacks on UNAMSIL personnel and peacekeepers.

Conclusion

In conclusion, your Honours, the evidence that will be presented before this Court will be harrowing, disturbing and upsetting. Many of the witnesses are fearful: of the Court process of being on display, of having to relive traumatic and humiliating experiences. But they have agreed to come because they understand that this Court and its findings are important to more than just the people of Sierra Leone.

The scale of the criminality of the three Accused, Sesay, Kallon and Gbao, who stand before you, is such that they committed international crimes. There must be no impunity for those who bear the greatest responsibility for them.

The threat of those who ignore universal standards of civilised behaviour, who seek power and control for their own ends, who unleash terror on the citizens of their own country, becomes less by the establishment of International Courts and the fairness of their proceedings. Such will be the legacy of this Court.