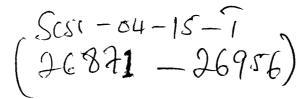
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## CASE No.SCSL-2004-15-T

16871

## SPECIAL COURT FOR SIERRA LEONE TRIAL CHAMBER 1

Before:

Hon Justice Bankole Thompson, Presiding Judge Hon Justice Pierre Boutet Hon Justice Benjamin Mutanga Itoe

**Acting Registrar:** 

Mr Herman Von Hebel

Date: 19 March 2007

**PROSECUTOR** 

Against

ISSA HASSAN SESAY MORRIS KALLON AUGUSTINE GBAO

#### **PUBLIC**

# KALLON DEFENCE FILING IN COMPLIANCE WITH SCHEDULING ORDER CONCERNING THE PREPARATION AND COMMENCEMENT OF THE DEFENCE

CASE

#### Office of the Prosecutor

Stephen Rapp Christopher Staker James C. Johnson Peter Harrison

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Shekou Touray Charles Achaleke Taku Melron Nicol-Wilson

**Defence Counsel for Issa Sesay** 

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Court Appointed Counsel for Augustine

Gbao

Andreas O'Shea John Cammegh

In compliance with the Scheduling Order Concerning the Preparation and Commencement of the Defence Case<sup>1</sup>, the Decision and Order on Defence Applications for an Adjournment of the 16<sup>th</sup> of February Deadline for Filing of Defence Material<sup>2</sup>, the Order for Defence Submissions and Interim Order on Kallon Motion for Immediate Protective Measures<sup>3</sup>, and the Order to Reclassify and Review Defence Materials<sup>4</sup>, the Defence for Morris Kallon files the following materials:

- Annex A A "core" witness chart in compliance with Order 1(a) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [53 pages]
- Annex B A "back-up" witness chart in compliance with Order 1(a) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [17 pages]
- Annex C Notice that the Accused, Mr Morris Kallon, will testify in compliance with Order 1(b) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [1 page]
- Annex D A list of expert witnesses in compliance with Order 1(c) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [1 page]
- Annex E Correspondence relating to common witnesses in compliance with Order 1(d) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [3 pages]
- Annex F A list of exhibits in compliance with Order 1(e) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [1 page]
- Annex G An indictment chart in compliance with Order 1(f) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [5 pages]
- Annex H Agreed Statement of Facts between the Second Accused and the Prosecution in compliance with Order 3 of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case [2 pages].

Dated 5 March 2007

Shekou Touray Lead Counsel 1

<sup>&</sup>lt;sup>1</sup> Prosecutor v Sesay et al. SCSL-04-15-T-659, Scheduling Order Concerning the Preparation and Commencement of the Defence Case, 30 October 2006.

<sup>&</sup>lt;sup>2</sup> Prosecutor v Sesay et al. SCSL-04-15-T-705, Decision and Order on Defence Applications for an Adjournment of the 16<sup>th</sup> of February Deadline for Filing of Defence Material, 7 February 2007.

<sup>&</sup>lt;sup>3</sup> Prosecutor v Sesay et al. SCSL-04-15-T-717, Order for Defence Submissions and Interim Order on Kallon Motion for Immediate Protective Measures, 1 March 2007.

<sup>&</sup>lt;sup>4</sup> Prosecutor v Sesay et al. SCSL-04-15-T-730, Order to Re-classify and Review Defence Materials, 7 March 2007.

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## **LIST OF AUTHORITIES**

Prosecutor v Sesay et al. SCSL-04-15-T-659, Scheduling Order Concerning the Preparation and Commencement of the Defence Case, 30 October 2006.

*Prosecutor v Sesay et al.* SCSL-04-15-T-705, Decision and Order on Defence Applications for an Adjournment of the 16<sup>th</sup> of February Deadline for Filing of Defence Material, 7 February 2007.

Prosecutor v Sesay et al. SCSL-04-15-T-717, Order for Defence Submissions and Interim Order on Kallon Motion for Immediate Protective Measures, 1 March 2007.

Prosecutor v Sesay et al. SCSL-04-15-T-730, Order to Re-classify and Review Defence Materials, 7 March 2007.

#### ANNEX A

#### KALLON DEFENCE CORE WITNESS CHART

## In compliance with Order 1(a) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

## **BOMBALI WITNESSES**

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
1.	018	The witness met Kallon in Makeni in 2000. Kallon punished combatants who were accused of harassing civilians. He can testify to Kallon's good relationship with civilians. The witness heard that Kallon was not involved in the UNAMSIL abductions but rather that it was other RUF combatants who were involved. Kallon promoted disarmament and the peace process.	37, 38, 44, 83	1 - 18	2 hours	Krio
2.	021	The witness will testify he was a civilian when the RUF entered Bombali district and he was appointed to liaise between the RUF and civilians in his area. Kallon was later based at Magburaka. The witness will testify to his knowledge of infighting between the RUF in Magburaka and Makeni. He will also speak about the good relationship between civilians and the RUF and how RUF combatants were disciplined if they harassed civilians.	38, 41, 44	1 - 14	2 hours	Krio
3.	031	The witness is a RUF insider. He met Kallon in Magburaka around 1998. He can testify to	37, 43, 68, 83	1, 2, 12, 15, 16, 17, 18	2 hours	Krio

		Kallon's good relationship with civilians. He did not see Kallon use child combatants. He will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.				
4.	037	The witness will testify that she came to know the RUF in Makeni in 1999. She will testify about infighting between different factions of the RUF. She will testify about the good relationship between the RUF and civilians. She will testify about the abduction of the UN Peacekeepers and that Kallon was not involved.	37, 83	1 - 18	2 hours	Krio
5.	044	The witness will testify about Kallon's good relationship with civilians in Magburaka after 1998 and Kallon's disciplinarian stance against RUF combatants who harassed civilians. The witness did not see the use of child combatants. The witness will further testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	37, 38, 68, 83	1, 2, 12, 14, 15, 16, 17	1 hour	Krio
6.	082	The witness will testify he met Kallon in Masingbi in 1998. Kallon invited the witness and other CDF fighters to join with him in protecting the area. Kallon advised that they should protect the civilian population. Kallon punished RUF combatants who distressed civilians. Kallon did not use child combatants. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers and that Kallon was supportive of the disarmament process.	37, 41, 43, 44, 83	1, 2, 12,	1.5 hours	Krio
	095	The witness will testify he met Kallon in 1998. He will testify to Kallon's good	37, 43, 68, 83	1, 2, 12, 15, 16, 17, 18		Krio

		T	<del></del>			
		relationship with civilians and that he did not				
		see Kallon use child combatants. The witness				
		will testify that Kallon was not involved in				
]		abduction of the UNAMSIL peacekeepers.				
7.	105	The witness was a liaison between the RUF	37	1 - 14	40 minutes	Krio
1		and the civilians in Makeni and will testify to				
1		the good relationship between civilians and				
		the RUF in that area. The witness has				
		knowledge that Kallon supported education				
		initiatives in the area.				
8.	113	Some time in 1991, witness met RUF	31, 41, 42, 43,	6, 7, 8, 9,	1.5 hours	English
]	113	combatants, among them Kallon, when they	44, 45, 51, 54,	i .	1.5 Hours	Liigiisii
		arrived in Makeni. She attended a meeting in	57, 61, 65, 68,	18		
1		which the RUF's intention to co-exist	69, 73, 77, 81,	10		
1		peacefully with the civilian populace was	83			
		stressed. Witness will testify to the existence	65		i	
		of internal RUF laws prohibiting rape and				
		other crimes. Witness gives detail of the				
		involvement of certain RUF commanders in				
		the attack on UNAMSIL personnel near				
		1				
		Makeni, and emphasizes Kallon did not				
		participate. She states Kallon had good		1		
		relations with the peacekeepers. Witness will				
		also testify that civilians in the Makeni area				
		were well treated by the RUF, and denies any		!		
-	110	experience of RUF child soldiers.	25 12 22			
9.	119	The witness will testify he met the RUF in	37, 43, 83	1, 2, 7, 14,	2 hours	Krio
		Makeni in 1998. The witness was a civilian		15, 16, 17,		
		administrator and will testify about the good		18		
		relationship between the RUF and civilians in				
		Makeni. The witness did not observe				
		instances of 'forced marriage' or deliberate				
		burning of houses. The witness will testify		i 		
		that he advised the DDR camp supervisor not				

		1 1 1				
	į	to begin the disarmament process without				
	į	proper consultation with the RUF. Later				
		Kallon came to the camp and expressed				
		frustration that no proper consultation or				
	<u>.</u>	planning was undertaken.				
10.	120	Witness was in Makeni when she encountered	37, 38, 42, 43,	4, 6, 14	2 hours	Krio
		RUF soldiers, including Kallon. She cannot	44, 45, 51, 54,			
	!	recall the year. The RUF men gave her food	57, 61, 65, 68,			
	1	and supplies, and asked that she stay with	69, 73, 77, 81			
		them in the town. The witness was able to	, , ,			
		start schools to help educate the children in				
		the area, with help from RUF commanders.				
		Kallon spoke out against looting, and made				
		sure the schools were protected. The witness				
		maintains the rebels had good relations with				
		the civilians in Makeni.				
11.	121	In 1991, the witness returned to Makeni to	37, 38, 41, 42,	4 6 15 18	2 hours	Krio
11.	121	find the RUF installed there. He was	43, 44, 45, 51,	¬, 0, 1 <i>J</i> , 10	2 110013	1210
		persuaded by RUF commanders to stay with	54, 57, 61, 65,			
		his family. The witness states laws against				
		rape, murder and other atrocities were put in	69, 73, 77, 81, 83			
		, • ·	0.3			
		place by the rebels, and these were enforced				
		by Kallon. Civilians were assisted, according				
		to the witness, with food and medicines –				
		these were often distributed by Kallon				
		himself, as he did not have his own troops.				
		Witness recalls infighting among the RUF.				ļ
		The witness will testify that Kallon was not				
		involved in the abduction of the UN				
		peacekeepers				
12.	124	The witness will testify that Kallon had a	37	1 - 14	30 minutes	Krio
]		good relationship with civilians. She will				)
		testify that Kallon supported the disarmament				
		process which some RUF combatants				
		L	<u> </u>	L	1	L

		disliked.				
13.	131	Witness was in Makeni in 1998 when RUF	37, 39, 43, 54,	1, 2, 6, 7, 8,	1.5 hours	Krio
		rebels entered the town. Witness will testify	77	9, 14		
		that while in Makeni, he liaised with the G5				
1		office of the RUF. Witness states that Kallon				
		was based in Magburaka only visiting Makeni				
	<u> </u>	infrequently. Witness will testify that Kallon				
		treated civilians with respect. Witness states				
		that no looting, rape or burning of houses took				
		place.				
14.	147	Witness was assigned to UNAMSIL in March	83	15, 16, 17,	2.5 hours	English
		2000, as a commander. He was based in		18		
		Makeni, and reports he never knew Kallon.				
		Many of the RUF people the witness met				
		while held captive by the RUF were of				
		Liberian origin. He knows of no involvement				
		Kallon had in the attacks on UN				
		peacekeepers.				

## KAILAHUN

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
15.	024	The witness will testify he first met Kallon at a meeting in 1994 where Kallon addressed civilians and the RUF, stating civilians should not be harassed. The witness will testify to the good relationship between the RUF and civilians. The witness did not observe instances of forced farming or 'forced marriage'. The witness will testify to his knowledge of the killing of the suspected Kamajors.	38, 43, 44, 69	1, 2, 3, 4, 5, 7, 10, 11, 13, 14	2 hours	Mende
16.	025	Witness states he met Kallon at Kailahun in 1994 or 1995, during which time Kallon was fighting at the front. Government troops had captured Buedu, according to the witness, and civilians and combatants alike retreated to Camp Zogoda. At that time, the witness advises farming projects were begun, though Kallon was not involved in this. He states the farming was a co-operative effort, and work was not coerced. The witness relates details of the command structure in the area, and recalls Kallon was junior in this structure. He indicates Kallon was not involved in the killing of Kamajors that occurred in Buedu. The witness will also testify that 'forced marriage' did not occur within his experience, and that civilians were allowed by the RUF to	34, 37, 38, 39, 41, 42, 43, 44,	7, 13	2.5 hours	Mende

		<del></del>	r <del></del>		<del></del>	
		go about their business unimpeded.				
17.	059	The witness will testify that he met Kallon in	37, 38, 43, 44,	1, 2, 7, 12,	1.5 hours	Mende
ł		Kailahun around 1994 at a meeting where he	68	13, 14		
ł		addressed civilians and RUF combatants and				
ĺ		stressed that civilians should be taken care of.		1	}	
		The witness next saw Kallon when the ICRC				
		distributed food. Kallon admonished RUF				
		combatants not to interfere with these		i	i.	
ļ		supplies and also not to interfere with the			,	
ļ		farming activities of civilians. The witness did				
}	}	not see Kallon use child combatants. The			1	
}		witness will testify about the good	į			
1		relationship between the RUF and civilians.				
		The witness did not observe occurrences of				
		'forced marriage'.				
18.	070	The Witness is a RUF Insider. He was in	38, 44	1- 14	1 hour	Krio
		Kailahun in 1998 the Witness was in Buedu				
		when a RUF officer, was brought in for an				
		investigation for allegedly mistreating a				
		female trainee. This officer was subsequently				į
		was removed from her position.				

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## KENEMA

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
19.	017	The witness is a RUF Insider. He was based in Tongo Field from 1997 and can give evidence as to the command structure there and which RUF combatants were responsible for mining activities.	69, 70	13	2.5 hours	Krio
20.	067	The witness will testify he met Kallon when he was sent to Tongo Field in 2000 to investigate claims of harassment of civilians by RUF commanders. The witness will testify that Kallon called a meeting, at which the offending RUF commanders wer called to account. The witness will testify that Kallon returned again in 2001 to lecture combatants on disarmament.	36, 37, 38, 43, 44, 69, 70, 77	13, 14	2 hours	Krio
21.	104	Witness met Kallon, when he came to investigate reports that a renegade RUF commander had been harassing civilians and forcing them to conduct mining activities on his behalf. Complaints had been made by civilians, including the witness, to the RUF command, and Kallon came in response to this. The witness attended a public meeting at which Kallon spoke and promised swift action to stop harassment. This action was later taken.	36, 37, 38, 43, 44, 69, 70	9, 11, 13	1.5 hours	Krio

## KONO

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
22.	032	The witness is a RUF insider and worked as a radio operator. He will testify about the retreat from Makeni to Kono in 1998 and instances of looting. He will also testify about the RUF command structure in Kono from 1998 to 1999 and Kallon's de facto role.	25, 77	14	2.5 hours	Krio
	073	The witness is a RUF insider and was based in Kono from 1998. He will testify that Kallon was not involved in the looting of the Kono Bank and that he was not responsible for mining activities. The witness was present in Makeni during the abduction of the UNAMSIL peacekeepers and will testify that Kallon was not involved.	36, 69, 70, 77, 80, 83	1, 2, 13, 14, 15, 16, 17, 18	2.5 hours	Krio
23.	084	In 1998, after the intervention, the witness was brought from her village to Koidu Town by rebels. She can speak to the good treatment she received at the hands of the RUF, and from Kallon specifically. She states civilians generally were looked after by the G5 Unit, and food and medicine were provided. The witness states Kallon was rigourous in punishing breaches of the RUF laws, including the prohibition on rape. She further states the man killed by Kallon in connection to a sacrificial sheep was a combatant.	37, 38, 42, 43, 44, 45, 48, 54, 55, 61, 62, 69, 71, 80	4, 6, 13	1.5 hours	Krio

	088	Witness was traveling to Kono to undertake diamond mining, when he was set upon and beaten by AFRC/ SLA soldiers wanting to loot his diamond proceeds. Kallon intervened to free him and other civilians. When fleeing Kono with Kallon's help, the witness saw buildings in the town burning, and heard from others leaving the area that the AFRC/ SLA had set houses alight.	36, 37, 38, 41, 42, 44, 77, 80	14	1.5 hours	Mende
25.	126	The witness is a RUF insider. He was based in Kono from 1998 to 1999 and can give evidence about the RUF command structure there at the time. The witness will testify that Kallon would warn combatants not to commit crimes and informed them of their punishments should they do so.	37, 38, 44	1 - 14	2.5 hours	Krio
26.	142	The witness, a former NPRC staffer, was in Freetown up to 1995, when he resigned his post and moved to Kono. Witness saw fighting between Kamajors and junta forces in Kono after the ECOMOG intervention, and met with RUF troops near Tombodu. The RUF men, according to the witness, saw to his needs and took him to be cared for by their commander. The witness can speak to the command structure operating in Kono at this time, and to communications practices to which he was privy. Witness states Kallon was present, and maintained good relations with civilians. He will also testify to cooperative, rather than coercive, mining efforts undertaken between combatants and civilians. The witness will also speak to the rift between SLA and RUF elements, and to the atrocities	24, 27, 28, 34, 36, 37, 38, 41, 42, 43, 44, 45, 48, 54, 55, 61, 62, 69, 71, 77, 80	4, 6, 12, 13, 14	5 hours	English

	committing by undisciplined soldiers. Kallon,
	according to the witness, had a particular role
1	in investigating such crimes – for example,
	the break-in at the Commercial Bank – and in
	enforcing the rules of the RUF movement.
1	The witness will detail the medical and
	educational programs established by the RUF
	in Kono, for both civilian and combatant use.

## TONKOLILI

DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
27. 019	The witness will testify that he met Kallon in 1998 at Masingbi. Kallon told the RUF fighters not to kill the Kamajor fighters. Kallon ordered the release of some civilians who had been detained by RUF combatants Kallon was a strict disciplinarian who punished RUF combatants whenever they committed crimes.	37, 38, 44, 45	1, 2, 3, 4, 5, 10, 11	1 hour	Krio

## **MULTI-DISTRICT**

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
28.	001	The witness will testify about Kallon's background and how he was abducted into the RUF in Liberia. She will testify about staying with Kallon in Makeni following the AFRC coup and then the retreat to Kono in 1998. She will explain about difficulties that arose between Kallon and the RUF leadership and also disputes between the AFRC and RUF. She will testify to Kallon's good relationship with civilians.	24, 25, 27, 28, 37, 41	1, 2, 3, 4, 5,	2.5 hours	Krio
29.	004	The witness will testify he joined the RUF voluntarily in 1991, becoming a part of the movement's humanitarian wing. He was an officer for food and agriculture, supervising farmers to ensure food security in RUF-controlled zones in Kailahun until approximately 1995. He will testify that Kallon was not involved in forced farming. The witness will give evidence of the existence and operations of RUF humanitarian agencies and their interaction with other non-governmental aid organizations. The witness left Kailahun in about 1995, traveling to Kenema District, returning after Kamajor attacks, and moving on to Makeni in 1999. The witness will testify to his role in coordinating humanitarian	24, 25, 27, 28, 34, 36, 37, 38, 39, 41, 42, 43, 44, 51, 57, 65, 68, 73, 81	3, 13	1.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		assistance to vulnerable persons behind RUF lines. He will state he first met Kallon in 1996 and spent time with him around 1999 when assigned to Makeni. The witness will also detail command structures and RUF/SLA relations at that location.				
30.	006	The witness is a RUF insider and was a member of the Internal Defence Unit. The witness can speak to the command structure and operations of this unit The witness met Kallon in Kangari Hills, and will testify to his movements and position. He maintains Kallon was passed over for promotion in the movement due to mission failures. The witness will detail the breakdown of relations between the SLA and RUF during and following the retreat to Kono. He states that Kallon was not involved in the robbery of the Commercial Bank at Kono, in forced mining operations at Tongo Field or killing of civilians at Tombodu. He also points to the role of Kamajors in destroying property in Koidu. As a member of the IDU, the witness will give testimony on the treatment of women throughout the movement. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	24, 25, 26, 28, 34, 35, 36, 37, 38, 39, 41, 42, 43, 44, 45, 48, 50, 54, 61, 68, 69, 70, 71, 77, 80, 83		3 hours	Krio
31.	007	Witness joined the RUF in Liberia some time in 1991, training with Kallon at Nama before	24, 25, 27, 28, 34, 35, 36, 37,		2.5 hours	Krio

	DMK	Description of expected testimony	Para of	Indictment	Estimated	Language
	No/		Indictment	counts	time for	
	Name			ti	testimony	
					1	
		being deployed to Kailahun. He met Kallon	38, 39, 41, 42,			
		again at Makeni, after the fall of the AFRC	43, 44, 45, 54,			,
		government. Witness states Kallon was based	61, 68, 69, 77,			
		there, and had visited Freetown only	83	I		
		occasionally. The witness retreated to Kono,				
		and can give details of the command structure				
	}	there, as well as information relating to the				
		interactions between SLA and RUF groups at				
		that location. Witness later moved to Makeni,				
		and in 2000, was there when the UN				
		peacekeepers were abducted. He states certain				
		RUF commanders were involved, though not				
		Kallon, who was elsewhere. Witness will also				
}		testify generally to the existence of RUF laws				
		and disciplinary procedures, as well as to	ļ			
		deny any experience of 'forced marriage'				
		among the RUF camps.				
32.	008	The witness is a RUF insider. He met Kallon	24, 27, 28, 34,	4, 5, 6, 7, 8,	3 hours	English
1		in the early 1990s. The witness will relate rifts	35, 36, 37, 38,	9, 12		
		between Liberian and Sierra Leonean	39, 41, 42, 43,			
		members of the RUF and the imprisonment	44, 45, 54, 61,			
		by the former of Kallon and other RUF	68, 69, 70, 77			
		commanders. Following the AFRC coup the				
		witness was posted to Freetown. He will				
		testify that Kallon was based in Bo at this				
		time. The witness later took up assignment in			,	
		Kailahun, and states Kallon was not present at				
		the time of the killing of the Kamajors. The				
	1	witness will further testify to the existence				
		and enforcement of laws governing RUF				

[	DMK	Description of expected testimony	Para of	Indictment	Estimated	Language
	No/		Indictment	counts	time for	
	Name				testimony	
		combatants, and to the proper treatment of				
		women and children in rebel camps.			<u> </u>	
33.	014	Witness was a student in 1997, when he first	24, 25, 34, 36,	6, 7, 8, 9,	2.5 hours	English
		met Kallon. He reports that civilians were	37, 41, 42, 43,	12, 15, 18		
		happy the RUF had arrived there, as they had	44, 54, 68, 69,			
	1	previously been harassed by the SLA.	83			
	}	Witness states Kallon was very strict in				
	ļ	ensuring his fighters abided by the RUF laws.				ł ł
	}	Witness further details Kallon had a large				
	ł	extended family in Bo, and would look after				
	}	civilians in the area. The witness will testify				
		that Kallon went to visit other RUF				
	1	commanders in Freetown during this time, but				
-		never went to Kenema between 1997 and				
	ļ	1998. Witness states he traveled with Kallon				
		as they were pushed out of Bo by ECOMOG,				
		retreating to Kono. He can relate the				
		command structure there, and recalls Kallon				
		being jailed by Mosquito in Buedu. Witness				
	}	denies Kallon's involvement in forced labour.			1	
	]	Later in 1998, the witness joined Kallon in				
		Makeni, where he reports good relations				
	}	between the RUF and civilians. He never				
	1	became aware of 'forced marriage' or the use				
	1	of child combatants by the RUF. The witness				
		saw certain RUF commanders take part in				
1		attacks on the UNAMSIL peacekeepers, and				
		maintains Kallon was elsewhere.				
34.	016	The witness is a RUF insider and worked with	38, 44	1 - 14	2 hours	Krio
		Kallon from around 1995. He will testify that				

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		Kallon was strict in disciplining RUF combatants who violated internal RUF laws. He did not see Kallon commit any of the crimes alleged.				
35.	027	The witness is a RUF insider. The witness first met Kallon in late 1992 or early 1993, and can speak to the RUF command structure at this time. He indicates there was a rift between Liberian and Sierra Leonean factions, such that Kallon and others were imprisoned for a time before being freed by combatants including the witness. The Liberians were driven out, and Kallon was posted at Pendembu. After the AFRC coup, the witness was sent to Lungi. The witness will testify about the retreat to Kono in 1998 and give evidence about the command structure there from 1998 to 1999 The witness describes crimes committed by the AFRC/ SLA in Kono, and subsequent splits between RUF and AFRC/ SLA groups as well as infighting among the RUF itself. The witness also states children were cared for in RUF camps, and were not armed. He will testify that the RUF laws concerning fair treatment of civilians were well respected and enforced by the G5 unit and others.	34, 36, 37, 39, 41, 42, 43, 44, 51, 48, 55, 57, 62, 65, 68, 71, 73, 80, 81	1, 2, 4, 6, 7, 12, 14	4 hours	Mende
36.	028	The witness will testify that he was captured around 1992 by Liberian RUF rebels. Later he met Kallon who asked him to be his	38, 39, 77, 80, 83	1, 2, 3, 4, 5, 10, 11, 12, 14, 15, 16,	3 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		bodyguard as he did not like small boys fighting but the witness declined. After the AFRC coup, he met Kallon in Kailahun and joined him. The witness participated on the attack on Kono and did not receive any orders to loot or burn Kono. The witness will testify about disciplinary action by the RUF should such acts be committed. The witness saw some UNAMSIL peacekeepers beating and disarming a RUF combatant. He informed some other RUF officers about this who went to the scene. Kallon was not present.		17		
37.	029	The witness will testify he was abducted some time in 1992 by Liberian RUF rebels. He initially did domestic work for some commanders. In 1995, he met Kallon at Camp Zogoda, in Kenema, and can speak to the command structure and the laws operating among the RUF. He can indicate Kallon's role in disciplining combatants was explicitly endorsed by the RUF commander in chief. The witness became a fighter when he was around 17 years old. The witness was sent to the Northern Jungle under the command of another RUF leader, where he stayed until the intervention. The witness can testify about the retreat to Kono in 1998. Witness indicates Kallon's shooting over a sheep was directed at a soldier. Witness also details infighting between RUF and SLA factions and a falling	24, 25, 26, 27, 28, 34, 36, 38, 39, 41, 42, 43, 44, 48, 55, 62, 71, 80	4, 5, 6, 7, 12, 13, 14	3 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		out among RUF commanders, including Kallon, in Kono.				
38.	033	The witness is a RUF insider. She first met Kallon at Bo Highway and can testify to his good relationship with civilians. She was based in Kono from 1998 and can testify about the RUF command structure at that time. She will testify that she did not see Kallon order or personally kill civilians. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	25, 37, 45, 83	1, 2, 3, 4, 5, 15, 16, 17, 18	2 hours	Krio
39.	035	The witness will testify that he joined the RUF in 1991. He underwent training and was taught about RUF ideology. The witness can give evidence about internal laws in the RUF and punishments should these laws be violated. The witness can testify about problems between the Liberian and Sierra Leonean factions of the RUF. The witness can give evidence as to the RUF command structure in 1992 – 1993. He met Kallon in 1995 at Zogoda where Kallon's disciplinarian stance was praised. The witness can give further evidence as to the reorganisation of the RUF command structure in 1995. After the AFRC coup the witness traveled to Bo where he met Kallon again. The witness will give evidence about the retreat to Kono in 1998 and also evidence about the Kono	24, 38, 44, 68, 83	1, 2, 12, 14, 15, 16, 17, 18	7 hours	Krio



DMK No/ Name		Para of Indictment	Indictment counts	Estimated time for testimony	Language
40. 039	command structure. Witness details difficulties among RUF commanders, including Kallon, in Kono. Witness will give further evidence about infighting in the RUF in Makeni. The witness can give evidence about the abduction of UNAMSIL peacekeepers and various RUF officers' role. The witness did not see Kallon use fighters who were under age.  The witness joined the RUF around 1994 and met Kallon at that time. She stayed with Kallon's family for three years, based at Camp Zogoda, Kenema District, and will testify about his domestic situation and care of abandoned children. The witness will detail Kallon's disciplinary role and standing among other combatants. The witness moved to Kono in 1998, and is able to give detail of the command structure, and AFRC/ SLA and RUF relations, at that location. She gives details of a jet attack at Kaihema, and subsequent house burning. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers The witness did not experience incidences of 'forced marriage' in RUF camps and will give evidence of RUF internal laws forbidding	25, 34, 36, 37, 38, 41, 42, 43, 44, 48, 54, 55, 62, 71, 80, 83	6, 7, 12, 14, 15, 18	2 hours	Krio
41. 042	The witness is a RUF insider. He met Kallon at Zogoda, Kenema in 1994 and worked with	24, 38, 44, 45 - 82	1 - 14	2 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		him for about 3 years. He will testify that Kallon was a strict disciplinarian against RUF combatants who violated RUF internal laws and that he did not see Kallon committing any atrocities. Kallon assisted the witness when he was injured.				
42.	048	The witness voluntarily joined the RUF in 1997. He can testify about the retreat to Kono in 1998 and can testify about the command structure in Kono from 1998 to 1999. The witness later was posted to Magburaka. The witness will testify that Kallon was not involved in the abduction of UNAMSIL peacekeepers. The witness can testify that Kallon was a strict disciplinarian against RUF combatants who violated internal RUF laws.	25, 38, 44, 83	1 - 18	2.5 hours	Krio
43.	049	The witness is a RUF insider. He can detail ongoing problems between SLA and RUF factions and harassment of civilians by the former. The witness will testify that civilians were cared for among the RUF by the G5 unit. He can speak to the post-intervention command structure and to troop movements in Koinadugu at this time. The witness maintains there were few radio operators among the rebels, confined to senior commanders. He will testify about the lack of co-operation between the RUF and AFRC/SLA, and that infighting was taking place within the RUF in Kono. In late 1998, the	25, 27, 28, 34, 36, 37, 38, 41, 42, 43, 44, 50, 57, 65, 73, 81, 83	4, 6, 14, 15, 18	3 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		witness moved to Makeni. There, he met Kallon, who was reaffirming the RUF laws and promising punishment to those who broke them. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.				
44.	050	The witness is a RUF insider. He will testify that he was a G5 and was later posted to Kono in 1998 where he met Kallon. He can testify about the RUF command structure in Kono during that time. The witness can testify about Kallon's good relationship with civilians and that he did not see Kallon commit any of the alleged crimes. The witness was later posted to Makeni. Kallon was a firm disciplinarian against RUF combatants who harassed civilians, for example Kallon took disciplinary measures against RUF combatants who looted property from civilians.	25, 37, 38, 44	1, 2, 14	2.5 hours	Krio
45.	052	The witness is a RUF insider. He was made a G5 commander and would follow the front to look after civilians as the fighting advanced. At Camp Zogoda, he met Kallon, and will speak to his good relations with civilians, and his reputation for disciplining fighters. Some time in 1996, the witness traveled to Kangari Hills, where he witnessed a bodyguard punished for harassing a civilian. The witness will testify about the retreat to Kono and the	24, 25, 34, 36, 37, 38, 39, 41, 42, 43, 44, 48, 54, 55, 62, 68, 69, 71, 80	4, 5, 6, 7, 8, 9, 12, 14	3 hours	Mende

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		lack of effective command at that location. The witness will testify as to the rules that governed RUF fighters, including the prohibition on burning houses. He will point to a breakdown in co-operation between RUF and AFRC/ SLA elements. As a G5 commander, the witness will also testify to the RUF's treatment of women, and to the efforts to care for, and educate, children in the camps.				
46.	053	The witness is a RUF insider. He will testify about the retreat from Makeni to Kono and his knowledge of the RUF command structure in Kono from 1998 to 1999. He will testify that Kallon was not involved in the looting of the Sierra Leone commercial bank. He will testify that Kallon was not involved in the 6 January 1999 invasion of Freetown as he was based in Magburaka. Kallon was a strict disciplinarian and not liked by some in the RUF movement.	25, 34, 38, 44	1, 2, 14	2.5 hours	Krio
47.	055	Witness joined the RUF voluntarily in Bo during the late 1980s, but never undertook military training, as he became part of the ideological and political wing of the movement. He details the role of the G5 unit within the RUF; its part in civilian protection and education. The witness will give evidence of RUF internal laws and processes for enforcement. During the junta period, the		4, 5, 6, 7, 12	1.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
48.	056	witness remained in Kenema and will give details of the command structure at that location. He details civilian killings in Kenema and will testify that Kallon was not involved. The witness moved to Kailahun some time in 1998, staying until early 2000. He states Kallon was in Kono and Magburaka during this period, though his large extended family, which he used to visit, was in Kailahun. The witness will testify that Kallon did not use child combatants  The witness is a RUF insider. In 1994 or	24, 25, 26, 27,	3, 4, 5, 6,	4 hours	Mende
70.		1995, the witness came to know Kallon at a base in the Bo area, where Kallon was involved in disciplinary activities against RUF combatants. The witness can testify to the command structure at that time. When the AFRC came to power, the witness had been assigned with Kallon to the Northern Jungle. Kallon did not have troops under his command. The witness went to Freetown until the retreat to Kono in 1998. The witness will testify that Kallon did not kill civilians in Koidu Town. He will also state that Kallon was not involved in the robbery of the Commercial Bank there. The witness will testify to the command structure operating in Kono from 1998 to 1999. The witness will testify to infighting between Kallon and other RUF commanders. The witness will testify	24, 23, 20, 27, 28, 34, 36, 37, 38, 39, 41, 42, 43, 44, 48, 51, 55, 57, 62, 65, 68, 71, 73, 80, 81, 83		4 nours	Mende

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment	Estimated time for testimony	Language
		that Kallon was not involved in the abduction of UNAMSIL peacekeepers. He will further testify that Kallon did not use child combatants.				
49.	057	The witness is a RUF insider. In 1992, the witness was posted to Bunumbu, where he met Kallon, and where he experienced infighting between Liberian and Sierra Leonean RUF elements. He will testify to the existence of RUF internal laws, and to the strictness with which they were enforced by Kallon. He can give details of the RUF command structure in Kono from 1998 to 1999 and will testify that Kallon was not involved in violence against civilians or the looting of the Commerical Bank. The witness can also give details of the lack of cooperation between RUF and AFRC/ SLA groups in Kono. The witness will further testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	25, 38, 42, 44, 48, 80, 83	1, 2, 3, 4, 5, 6, 7, 8, 9, 14, 15, 16, 17, 18		Krio
50.	058	The witness met the RUF in 1991 in Kailahun. He started working with them as a medical personnel, assisting wounded combatants. He will testify about the good relationship between the RUF and civilians in Kailahun. He later joined the RUF and was told about key internal laws against the harassment of civilians and about the ideology of the RUF. He met Kallon around	25, 37, 38, 43, 44, 68, 69	1, 2, 12, 13	3 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		this time and can testify to his disciplinary stance against RUF combatants who violated internal RUF laws. The witness was posted to Freetown following the AFRC coup. He can testify about the retreat to Kono in 1998 and the RUF command structure in place at that time. The witness did not see Kallon use child combatants. The witness did not see civilians being used as forced labour.				-
51.	069	The witness will testify that he was captured by ULIMO forces in 1992 and then later joined the RUF. He would see Kallon at Zogoda. At Zogoda the witness' role was to assist the signaler. The witness traveled to Freetown after the AFRC coup. The witness can testify about the retreat to Kono in 1998 and his knowledge of the command structure. The witness saw Kallon again in Makeni. The witness can testify about infighting between different factions in the RUF as well as lack of co-operation between the SLA and RUF in Makeni. The witness did not see Kallon with child combatants. Kallon would discipline RUF combatants who harassed civilians. The witness heard that UNAMSIL peacekeepers were disarming RUF combatants by force and can testify about a RUF officer's involvement in the UN abductions. The witness did not see Kallon's involvement.	25, 38, 41, 44, 67, 83	1, 2, 12, 14, 15, 16, 17, 180	3 hours	Krio
52.	071	The witness is a RUF insider and joined the	24, 25, 26, 27,	6, 7, 8, 9, 14	3 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		RUF's medical unit. He can speak to the command structure of the unit and of the RUF at that time. In 1997, the witness heard that Kallon was to come to Camp Zogoda to face disciplinary charges, after which he went back to his station at Kangari Hills – joined by the witness. The witness states Kallon was strict in his enforcement of the RUF's rules and, for example, would punish severely any combatant found looting or burning. The witness went to Freetown during the junta period, and heard Kallon was assigned to Bo. When ECOMOG intervened, the witness retreated to Kono, and met later with Kallon. The witness can speak to the command structure there, and to Kallon's ongoing disciplinary role. He can also testify to problems between the RUF and AFRC/ SLA and that Kallon was not involved in the looting of the Commercial Bank.	28, 34, 36, 37, 38, 39, 41, 42, 44, 80			
53.	072	The witness is a RUF insider. He met Kallon around 1992. The witness will testify that around 1994 he was assigned, as a member of the Internal Defence Unit, to enforce the laws of the RUF, which governed all combatants and were designed to protect civilians. The witness can speak to the nature of these laws and to the processes for their enforcement. While in Benguema, he was involved in farming, and maintains no-one was forced to	38, 39, 41, 42, 43, 44	4, 6, 12, 13, 14	4.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		participate. In 1998, the witness left as part of the general retreat to Kono, and can testify to the infighting between RUF and AFRC/ SLA groups there. He will testify that Kallon was not involved in the killing of civilians and can testify to Kallon's role in disciplining and punishing, combatants.				
54.	074	The witness will testify that she was attacked by a group of Kamajors and assisted by Kallon. Kallon informed her it would be better for her to stay with the RUF for her protection. The witness traveled with the RUF to Kono and can testify about the looting and burning of Koidu Town. The witness was in Magburaka when the UNAMSIL peacekeepers were attacked and can testify Kallon was not involved. The witness will testify that Kallon had a good relationship with many UNAMSIL peacekeepers.	37, 69, 71, 83	1, 2, 14, 15 - 18	2 hours	Krio
55.	075	The witness will testify he met some RUF rebels in the bush in Kono in 1998. He decided to go along with them with his family. The witness met Kallon in Kono. The witness will testify about his knowledge of the command structure in Kono at the time. Kallon protected the witness' wife from being attacked. The witness will testify to Kallon's good relationship with civilians in Kono and also Magburaka where Kallon was later deployed. The witness can give evidence that	25, 27, 28, 37, 38, 43, 44, 68	1, 2, 3, 4, 5, 10, 11, 12, 13, 14	2 hours	Krio



	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		civilians were not forced to mine by the RUF. He also states that Kallon did not kill civilians and refers to Kallon disciplining RUF combatants who harassed civilians. Kallon did not use child combatants.				
56.	076	The witness is a RUF insider. He first met Kallon around 1996. The witness will give details of Kallon's disciplinary role and of RUF internal laws and punishments. The witness did not evidence abuse of women in RUF camps or the use of child combatants. The witness indicates he never witnessed Kallon with a personal radio. The witness moved to Kono, and can give evidence of the command structure in place there from 1998 too 1999, as well as the incidence of AFRC/SLA atrocities at that location. Witness indicates Kallon's alienation from the RUF leadership and his subsequent arrest for insubordination. The witness later traveled to Makeni, and will testify that Kallon was not involved in the UNAMSIL attacks.	24, 38, 39, 41, 43, 44, 48, 55, 62, 68, 83	6, 7, 8, 9, 12, 14, 15, 18	2.5 hours	English
57.	078	The witness is a RUF insider. He was based in Kono in 1998 and can testify as to the RUF command structure at that time. He will testify that Kallon was not involved in the looting of the Kono Bank and did not give orders to burn Kono. He will also testify that Kallon was not involved in the abduction of the UNAMSIL Peacekeepers.	25, 77, 79, 83	14, 15, 16, 17, 18	3 hours	Krio

	DMK	Description of expected testimony	Para of	Indictment	Estimated	Language
	No/		Indictment	counts	time for	
	Name				testimony	
58.	079	The witness will testify that she was abducted	37, 38, 43, 44	1, 2, 13	1.5 hours	Krio
		by rebels. Later Kallon met the witness, felt		1		
	1	sorry for her and told her to stay with his				
		extended family. The witness carried out				
		normal domestic jobs she would have done in				
		her own family setting. Kallon cared for the				
		witness as one of his children. The witness				
		will testify about Kallon's good relationship				
		with civilians and how he would punish RUF				
	007	combatants who would harass civilians.	24 25 26 25	1 2 2 1	4.1	
59.	087	The witness will testify that he was a G5	24, 25, 36, 37,	1, 2, 3, 4,	4 hours	Krio
		whose primary role was to take care of	38, 41, 42, 43,	5,6, 7, 8, 9,		
		civilians brought to safety from the front line.	44, 77, 80, 83	10, 11, 13,		
		If combatants mistreated civilians then they		12, 14, 15,		
		would be punished. The witness did not		16, 17, 18		
		observe instances of 'forced marriage'. The witness was with Kallon in 1996 at Kangari				
}		Hills and can describe the command structure				
		at that time. He was also posted to Kabala in			!	
		order to stop harassment of civilians there by				
		the SLA. The witness will also testify about				
		the retreat to Kono and the command				
		structure at Kono in 1998. The witness will				
		also testify about the looting of the				
		commercial bank by the SLA. The witness				
		will testify about problems between the SLA		!		
		and RUF and lack of cooperation between				
		them as well as infighting between RUF				
		factions. The witness will testify about				
		Kallon's good relationship with civilians and				

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		his disciplinarian stance against RUF combatants who harassed civilians. The witness can testify about some RUF combatants who were involved in the abduction of the UN Peacekeepers and states Kallon was not involved.				
60.	090	The witness is a RUF insider. He will testify that he was instructed in the proper treatment of civilians and the laws governing fighters. He met Kallon in 1994, in Pujehun The witness can speak to Kallon's strict punishment of the transgressions of combatants under his command. The next year, the witness was among a small group of fighters stationed at Bo with Kallon, who had his extended family there. The witness can testify to the protection of women in the camp, and will testify he did not evidence the use of child combatants by the RUF or 'forced marriage'. The witness traveled to Kono with Kallon, and speaks of the RUF being blamed for atrocities committed by the AFRC/ SLA. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	38, 41, 42, 43, 44, 45, 69, 83	6, 7, 8, 9, 12, 15, 18	3 hours	Krio
61.	091	The witness is a RUF insider. She will testify that children were not used as combatants and she was instructed to look after abandoned civilian children. The witness married (with no coercion) a RUF signaler. The witness was	48, 55, 63, 68, 70, 71	1, 2, 7, 8, 13, 14	2 hours	Mende

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
62	092	in Kenema with her husband, and can speak to the command structure there. She was later in Kono, and reports ensuing problems between Kallon and other RUF commanders. She will also testify to Kallon's good relationship with civilians. She did not evidence instances of 'forced marriage' by RUF commanders or instances of forced labour.	25 28 20 41	15678	2.5 hours	English
62.	092	The witness is a RUF insider In 1992, an SLA attack forced the witness and others to retreat to Buedu, where he met Kallon and other RUF commanders. The witness can speak to the command structure at that time. He was soon posted to Kangari Hills and remained there until 1997, moving to Freetown briefly before retreating to Kono. The witness can testify to the command structure in Kono from 1998 to 1999. The witness will testify to a break down in relations with the AFRC/ SLA. The witness will testify that Kallon did not kill civilians. The witness will speak to the good treatment of civilians, women in particular, at the hands of the RUF, and to Kallon's role in disarmament.	25, 38, 39, 41, 42, 44, 48	4, 5, 6, 7, 8, 9, 14	2.5 hours	English
63.	093	In 1991, the witness was caught by a group of Liberians and taken to the RUF training base at Bo Waterside. There were both Sierra	24, 33, 34, 36, 37, 38, 41, 42, 43, 44, 69, 77,	4, 6, 13, 14, 15, 18	4 hours	Krio
		Leonean and Liberian elements in Pujehun,	83			

DMK No/ Name	Description of expected testimony	Para o Indictment	f	Indictment counts	Estimated time for testimony	Language
	and the witness can testify to the command structure in place and the laws governing the movement. The witness first met Kallon in 1993, at Camp Zogoda, when he was taken there as a bodyguard to Foday Sankoh. He recalls Kallon then had no position, but was known as a strict disciplinarian. Witness can speak to the commanders present at Zogoda, having been present at a number of meetings at that place. In 1994, Sankoh assigned the witness to Kallon in order to have him report back on whether Kallon was too heavy handed in meting out punishment to combatants. The witness never saw him overstep his powers. When the RUF leadership was called to Freetown by the AFRC, the witness recalls Kallon being assigned to Bo, and followed him there to monitor him. During and after the retreat to Kono after the intervention, the witness maintains the group headed by Kallon did not loot or burn. Operation Pay Yourself was already underway by that time, and Kallon's group did not participate. The witness further states houses in Kono had been set alight by Kamajors by the time they arrived in Kono, and SLA/STF forces had broken into the bank. Kallon tried to recover the money, precipitating a split between the SLA and RUF. Witness indicates Kallon was just a					
	supervisor, with no troops directly assigned to					

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DMI No/ Nam		Para of Indictment	Indictment counts	Estimated time for testimony	Language
64. 097	him, and had to take commands from RUF senior officers. Kallon was, according to the witness, imprisoned at one point by the RUF command, and thereafter sent back to lay ambushes for ECOMOG near Gold Town. Then, Kallon became a front line inspector at Makeni, though he was not in command there. When the UNAMSIL abductions occurred, the witness recalls Kallon being unhappy with this. In 2001, Kallon asked the witness to go to Tongo, where the RUF was involved in cooperative mining arrangements with civilians. When a renegade commander began harassing civilians there, Kallon arrive and removed him, on orders from RUF command.  The witness is a RUF insider. She met Kallon at Black Water. The witness will testify Kallon was not liked by fighters, who said he was bad luck, and had problems with other RUF commanders. Kallon came again around 1996, from Bo Jungle. He was kind to civilians, the witness maintains, and protected them well. He had his family with him, including small children. The witness will testify about the retreat to Kono in 1998. The witness will testify that Kallon did not kill civilians in Tombodu. Kallon, according to the witness, would not allow looting, or for civilians to be used as forced labour. He would discipline combatants harshly, and fell	38, 39, 43, 44, 54, 69, 77	4, 6, 7, 13, 14	3 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		out with other commanders because of this. The witness will testify that she married a RUF combatant willingly and was not forced.				
65.	098	The witness will testify that she moved with the RUF in order to secure her safety from fighting forces. She went to Freetown with the RUF after the AFRC coup and then proceeded to Kono and later Makeni. She will testify about the looting of the Kono Bank. She will testify that she did not witness women who were forced to marry RUF commanders. She will testify about the treatment of civilians in Kono from 1998 to 1999. She did not see Kallon use child combatants. RUF combatants who harassed civilians would be punished.	37, 38, 43, 68, 77, 80	1, 2, 7, 12, 14	2 hours	Krio
66.	100	The witness is a RUF insider. She can give evidence as to the RUF command structure at Kangari Hills in 1996. She will testify that Kallon was disliked by many RUF combatants because of his no compromise stance concerning discipline of RUF combatants who violated internal RUF laws. The witness did not see Kallon committing any crimes alleged. The witness did not see Kallon use child combatants. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	38, 43, 68, 83	1, 2, 15, 16, 17, 18	2 hours	Krio
67.	110	The witness came to know Kallon around 1998. Kallon assisted the witness and his	37, 68, 83	1, 2, 12, 15, 16, 17, 18	2 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		relatives. He did not see Kallon use child combatants. Kallon was not involved in the January 6 1999 invasion of Freetown or the abduction of the UNAMSIL peacekeepers.				
68.	114	The witness is a RUF insider. He can testify about various RUF internal laws against harassment of civilians. The witness met Kallon in 1991 in Kailahun and worked with Kallon in Bo in 1997. He can testify about the retreat to Kono in 1998 and the burning of Kono. He will also testify about the RUF command structure in Kono from 1998 to 1999. He will testify about the killing of civilians at Tombodu and state that Kallon was not responsible. He will testify that Kallon did not kill a civilian for stealing a sheep. The witness will testify that he did not witness instances of forced faming in Kailahun. The witness will also testify about difficulties between the AFRC/ SLA and RUF.	25, 37, 39, 41, 43, 45	1, 2, 3, 4, 5, 10, 11, 13, 14	3 hours	Krio
69.	115	The witness is a RUF insider. He later received further training as a radio operator, in 1993. He can speak to the command structure of the RUF's radio operations, and to the processes of monitoring, maintenance, transmission, recording and security that surrounded radio communication. The witness was first assigned at Bailu, near the Liberian border, and met Kallon there. The witness	24, 25, 38, 43, 44, 68	12, 13	4 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		attended the Abidjan Peace Accord negotiations with RUF leadership in 1996, and later worked directly with RUF senior commanders, based at headquarters in Buendu. The witness can speak to the command structure of the RUF generally, and to the disciplinary and agricultural programs of the movement. He maintains that no child soldiers were used by the RUF.				
70.	116	The witness is a RUF insider. He met Kallon at Freetown in 1997 and reports that he was posted at Bo. The witness will testify about the retreat to Kono The witness will testify that Kallon was not involved in the looting of the commercial bank. The witness maintains that Kallon was not involved in mining, and looked after civilians well, and that in 1999, in Kono, they were able to go about their usual business. He states Kallon was strict toward his own men and would shoot fighters who looted. He also indicates Kallon traveled with family members, including children, and did not use child combatants.	24, 38, 39, 41, 42, 43, 68, 69	12, 13, 14	4 hours	Krio
71.	125	The witness is a RUF insider. He was posted to Kangari Hills, and can testify to the command structure there. He can speak to the different factions of which the RUF was then composed. The witness traveled to Freetown following the AFRC coup, and witnessed Kallon assigned by the AFRC leadership to	38, 39, 41, 42, 43, 44, 83	4, 5, 6, 7, 8, 9, 14, 15, 18	6 hours	Krio

	DMK No/ Name	Description of expected testimony	Para Indictment	of	Indictment counts	Estimated time for testimony	Language
		Bo. The witness went with Kallon and stayed in Bo until they retreated to Kono. He can testify about the command structure in Kono from 1998 to 1999. The witness will testify that Kallon did not kill civilians and that he did not loot the Kono Bank. The witness will testify to the breakdown in relations between the SLA and the RUF. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers. The witness will testify that Kallon had good relations with civilians, never had a 'bush wife', and was active in the disarmament processes.					
72.	127	The witness is a RUF insider. He will testify about the retreat from Freetown in 1998. He will state that Kallon did not kill Christopher.	25, 44, 45		1, 2, 3, 4, 5	1 hour	Krio
73.	129	Witness was assigned to UNAMSIL in December 1999, initially working in DDR at Lungi before deploying to Makeni in January 2000. Witness maintains that Kallon was the point of contact for relations with the RUF in Makeni, and was cooperative. He and Kallon discussed the terms of the cease fire, with Kallon claiming the UN had failed to meet its agreed obligations. Other commanders thereafter came to ask that combatants who had come to the UN to disarm be handed back to RUF leadership. With hostility mounting between the UN and RUF, Kallon arrived and, despite his anger at what he felt to be the	40		15 - 18	3 hours	English

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
74.	130	UN's betrayal, acted to stop RUF violence against the peacekeepers. After Kallon left, however, the witness was abducted by a separate group of RUF. The witness states Kallon was an effective liaison, facilitating transport of Savage through RUF controlled areas to Lungi, and even helping arrange sporting matches with the peacekeepers. Kallon kept good relations with the local civilians, and always acted when his attention was drawn to the misbehavior of combatants.  Witness served in the Kenyan Armed Forces and was assigned to UNAMSII in November	24, 25, 27, 28,	15, 18	3 hours	English
		and was assigned to UNAMSII in November 2000, taking command on November 22 of that year. He maintains the RUF were not a conventional force, despite superficial resemblances, and that military leaders such as Kallon were also seeking to serve a political agenda. After asking Charles Taylor to intercede on behalf of abducted Kenyan UNAMSIL peacekeepers, the witness then met with Foday Sankoh in prison to ask his help. A meeting between he and other RUF commanders was arranged, but he did not want to talk to Kallon, calling him a sellout. The witness advises Sankoh was an erratic, autocratic leader who would sometimes issue instructions to one commander that contradicted those given to another commander. Some commanders, meanwhile,	38, 39, 44, 83			

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DMK	Description of expected testimony		of	Indictment	Estimated	Language
No/ Name		Indictment		counts	time for	
Name					testimony	
	would refuse to obey instructions from Kallon					
	and others, only following orders they					
	perceived to come directly from Sankoh. The					
	witness, on making arrangements with senior				:	
	RUF figures for the deployment of UN troops					
	in Tongo Field, found later that RUF					
	commanders on the ground had					
	countermanded the orders. It was only after					
	Kallon was dispatched to Tongo to arrest a					
	particular RUF combatant and other					
	renegades that the deployment was able to		- 1			
	commence there. The witness further states		ĺ			
	that the supposed alliances between the SLA					
	and RUF were not built on any firm					
	foundation, and as such, quickly		j			
	disintegrated. He advises Kallon was never an					
	important substantive commander, and he was					
	mostly on the ground, rather than in					
	coordinating roles. Kallon cooperated with				-	
	the UN where he could – dismantling illegal					
	roadblocks and confiscating weapons., despite					
	considerable opposition. The witness					
	observed, however, that Kallon's relations					
	with civilians were positive, and saw schools					
	set up with his assistance in Makeni and					
	Magburaka. He was strict in punishing					
75. 132	fighters who threatened or harassed civilians.	20 /1 /2 /	1	12 15 10	5 h	TZ
13. 132	The witness is a RUF insider. He was first deployed in Pujehun and then moved to	38, 41, 43, 4	4,	12, 15, 18	5 hours	Krio
	Kailahun in 1996. The witness went to	68, 83	Ì			

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		Freetown with a group of RUF leaders after the AFRC coup and can speak to the RUF command structure at the time. He also details laws governing RUF fighters. The witness retreated through Makeni to Kono after the fall of the AFRC government, and gives information on the breakdown of co-operation between RUF and SLA groups there. The witness describes Kallon's disciplinary and investigative roles while in Kono. Witness will give evidence about the RUF's relations with civilians – denying any contact with RUF child soldiers. The witness moved to Makeni around 1999. He will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.				
76.	133	The witness is a RUF insider. The witness will testify that he met Kallon in 1995 at Kailahun. The witness was in Makeni at the time of the AFRC coup, and can speak to the command structure at that time. When the witness was in Freetown during the junta, Kallon was, he says, in Bo. The witness retreated with others to Kono after the intervention. The witness maintains the SLA and RUF forces in Kono had separate command structures, and infighting commenced between the groups. The witness will testify to Kallon's disciplinary stance against RUF commanders who committed	25, 38, 41, 44, 83	1, 2, 15, 16, 17, 18	2.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		crimes. The witness will further testify that Kallon was not involved in the abduction of UNAMSIL peacekeepers.				
77.	134	The witness is a RUF insider. He will testify about his knowledge of the RUF command structure in 1996. The witness will testify about the retreat to Kono in 1998. He will also testify about the command structure in Kono from 1998 to 1999 and the difficulties between Kallon and other RUF commanders, resulting in Kallon's imprisonment in Kailahun. He will further testify about infighting between different factions in the RUF and lack of co-operation between the RUF and AFRC/ SLA. The witness will testify to his knowledge of the looting of the Kono Bank. The witness will testify that Kallon was a strict disciplinarian and that he would punish RUF combatants who violated internal RUF laws. The witness will testify about the killing of civilians at Tombodu and state that Kallon was not responsible. He will testify about the abduction of the UNAMSIL peacekeepers and that Kallon was not involved.	24, 25, 39, 44, 77, 80, 83	3, 4, 5, 14, 15, 16, 17, 18	5 hours	Krio
78.	135	The witness is a RUF insider. He can testify about the laws governing fighters. He was sent to the front line, and with other RUF troops, was pushed into Liberia for a year, before re-emerging at Kailahun in 1992.	36, 37, 38, 39, 41, 44, 83		3 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		There the witness was trained as a radio operator by the RUF, working in this capacity throughout the war. Witness can speak to the command structure at this location, and the role and operational details of radio commanders. Witness recalls a message regarding insubordination by Kallon as a result of which Kallon was detained. He will give information about the types of radio sets used. He indicates, though, that perhaps 70% of the sets were faulty, affecting the work and isolating front line commanders. The witness can describe the process for transmitting and receiving messages, and the command structure that surrounded radio operations. The witness will also detail his role monitoring radio communications as a signal commander. During his time as a radio operator, the witness recalls messages relating to the split between RUF and AFRC elements in Kono, and the reaction to forcible disarmament of RUF fighters by the UN. He indicates Kallon was not involved in the latter.				
79.	136	Witness was trained by the RUF as a radio operator in 1993, working for a number of high-ranking RUF commanders through the course of the war. He can speak to the command structure of the movement at various points and will testify to the	26, 27, 28, 34, 36, 37, 38, 39, 44		4 hours	Krio

	DMK	Description of expected testimony	Para o	of	Indictment	Estimated	Language
	No/		Indictment		counts	time for	
	Name					testimony	
		interaction of senior figures with the AFRC					<del></del>
		during the junta period and afterward. The					
		witness sent messages to Kallon in 1997 and					
		1998, regarding his assignment to Bo. The					
		witness will also give testimony in relation to					
		the RUF's use of radio communications and					
		maintains that so many sets were faulty that					
		RUF commanders were often out of touch					
		with headquarters for extended periods. He					
		notes one instance where Kallon was unable					
		to communicate with RUF headquarters for					
		three months due to a failed radio set. The					
		witness states radio stations used by the RUF					
		were not secure and were open to a range of					
		personnel. Witness states that, during a spell		ļ			
		in Kenema in 1997 and 1998, he saw other					
		RUF commanders commit killings of civilians					
		alleged to have been perpetrated by Kallon.					
80.	137	Witness was assigned as Kallon's bodyguard	35, 39, 42, 42	3,	12, 13	4 hours	Krio
}	1	in 1996, and can speak to the command	44, 68, 74	l			
		structure that applied to such positions. He					
		did not see Kallon use child combatants. The					
		witness was with Kallon until 1998, when he					
		left to work on Kallon's family farm in					
		Buedu. The witness was in charge of the					
		harvest, and did not see civilians used as					
		forced labour. With members of Kallon's					
		family, the witness moved to join Kallon in					
		Magburaka in 2000. Witness will testify to					
		Kallon's positive treatment of civilians.					

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
81.	138	The witness will testify that Kallon took him, and other small boys, away from combat. The witness was cared for in Kallon's home, as he disapproved of the use of child combatants. The witness will testify about the retreat to Kono in 1998. The witness will testify about the difficult relationship between the SLA/AFRC from 1998. The witness can speak to the RUFs treatment of citizens and, on occasion, captured ECOMOG troops. He also has knowledge of the RUF command structure and internal laws. He will testify about mining operations from 2000. The witness will state Kallon was not present	36, 43, 61, 68, 83	4, 6, 12, 13, 14, 15, 18	3 hours	Krio
82.	141	when the fighting with the UN occurred.  The witness is a former SLA soldier. He met Kallon in Kono around 1998 and can testify to the command structure in place at the time. The witness will testify about a break down in relationship and co-operation between the SLA and RUF forces. The witness will testify that Kallon disciplined a RUF combatant who looted civilian property.	25, 38, 41, 44	14	2.5 hours	Krio
83.	143	The witness is a RUF insider. He will testify about the good relationship between the RUF and civilians. He will also testify about the laws governing RUF fighters. The witness relates attempts by Liberian elements of the movement to depose the RUF leader, and to dominate the Sierra Leonean members of its	35, 41, 42	4, 6, 14	4 hours	English

DM No/ Nan		Para Indictment	of	Indictment counts	Estimated time for testimony	Language
84. 144	command. In 1992, the witness was involved in repelling the Liberian renegades from Sierra Leone, and can speak to the command structure of the RUF at this time. The witness can speak to the disciplinary and communications processes employed by the RUF at this time. He will also detail changes to the command structure over 1996-1997, and infighting between RUF and SLA groups following the fall of the AFRC regime. The witness will further relate problems internal to the RUF, specifically conflict between rival commanders in Makeni and Lunsar during 1999. Witness can speak to Kallon's role in driving the renegade soldiers from Makeni.  The witness will testify that he was assigned to UNAMSIL in 2000. The witness met Kallon in Magburaka. Kallon was active and supportive of the peace process and cooperated with the witness. Kallon had a good relationship with the UNAMSIL peacekeepers and facilitated the movement of humanitarian workers. The skirmishes between the RUF and UNAMSIL in May 2000 were due to lack of confirmation and coordination by UNAMSIL with the RUF. Kallon was not responsible for this. Kallon was strict with RUF combatants who defaulted against rules, such as against looting. The witness did not come across any	37, 38,83		1, 2, 14, 15, 16,17, 18	4 hours	English

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		complaint against Kallon regarding poor treatment of civilians. Kallon solicited the assistance of UNAMSIL troops with regards to civilian welfare.				
85.	145	Witness was assigned to UNAMSIL in 1999, as a Military Observer (MILOBS). He states during his period of service in Sierra Leone, he does not recall Kallon being accused of any crime. He remembers Sankoh coming to Bo to speak in favour of the peace process and to encourage disarmament. In April, the witness recalls a disagreement with a RUF combatant who wanted weapons that had been handed in to the UN. This disagreement resulted in an attack on the MILOBS. He states no-one by the name of Kallon was involved in any abductions of UN personnel. He does not recall any use of child soldiers by the RUF at these postings, and reports general co-operation between them and the peacekeepers.	68, 83	12, 15, 16,17, 18	2.5 hours	English
86.	146	Witness was deployed to Sierra Leone in 1999 as part of the UNAMSIL Military Observer (MILOBS) contingent. On arrival in Magburaka, he was introduced to Kallon and other commanders by Sankoh, who was there encouraging disarmament. The witness recalls gunfire at one UN location, leaving MILOBS surrounded, but never saw hostage taking.	83	15, 16,17, 18	1.5 hours	English
87.	148	The witness met the RUF in 1999 and began	25, 37, 38, 41,	1, 2, 12	2.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		working as a liaison between the RUF and civilians as well as promoting peace between the fighting factions. He will testify to RUF combatants who committed crimes being punished. Kallon was a man of discipline and for this reason disliked by many RUF combatants. The witness will testify to the good relationship between civilians and the RUF. The witness did not see the use of child combatants. The witness will testify to his knowledge of the RUF command structure at that time and difficulties between the AFRC/SLA and RUF.	43, 68			
88.	151	The witness is a RUF Insider. He will testify he first met Kallon in Kailahun in the early 1990s. Kallon was imprisoned by the Liberian RUF faction because of his stance against harassment of the civilian population. They subsequently fought against the Liberian faction of the RUF. The witness will testify about his movements to Freetown and Kenema following the AFRC coup. He will also testify about the attack on Kono in 1998 and the RUF command structure at that time. The witness will testify about infighting between different RUF factions. He will also testify about difficulties between the AFRC/ SLA and RUF. The witness was a Blackguard and will testify about the group's function to	25, 38, 41, 44	1, 2, 14	4 hours	Krio

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	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		send reports to the RUF leader concerning the activities of combatants and whether they followed RUF internal laws. The witness will testify that Kallon was a strict disciplinarian against RUF combatants who violated these laws, such as those who looted.				
89.	152	The witness met the RUF in 1991 in Kailahun and served as a liaison between the RUF and civilians. He can testify about how the good relationship between the RUF and civilians in Kailahun. He met Kallon around this time and can testify to his disciplinary stance against RUF combatants who violated internal RUF laws. The witness later decided to join the RUF and was informed about various RUF laws against harassment of civilians. The witness served as an Intelligence Officer and would report on RUF combatants who committed offences. The witness was later posted to Kenema and then to Freetown. He can testify about Kallon's good relationship with civilians, particularly in Makeni. The witness did not see Kallon use child combatants. The witness can testify that farming, particularly in Kailahun, was not forced. The witness was actively involved in the peace process and can testify about Kallon's support for the disarmament process.	37, 38, 43, 44, 68, 69	1, 2, 12, 13	3 hours	Krio
90.	154	The witness stayed with Kallon and his family and assisted with domestic work. He was with	37, 38, 43, 44, 69	1, 2, 12,13	1.5 hours	Krio

	DMK No/ Name	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
		Kallon's family in Kailahun and can testify that they conducted private farming and did not use forced labour. Kallon was a man of discipline who would punish RUF combatants who committed crimes. He did not see Kallon use child combatants.				
91.	158	The witness is a RUF insider. After the AFRC coup, he moved from Kailahun to Freetown. He will testify about the retreat to Kono in 1998. There he met Kallon and he can testify about the command structure in Kono from 1998 to 1999. The witness will testify about Kallon's good relationship with civilians and how he punished RUF combatants who would commit crimes. The witness will testify to problems between the AFRC/ SLA and RUF forces. The witness did not see the use of child combatants by the RUF.	25, 37, 38, 41, 44, 43, 68	1, 2, 12	2 hours	Krio
92.	Mr Mauri e Ellie, Expert	Witness will discuss the agencies involved in DDR programs, and the activities they employed to verify the ages of supposed excombatants. He will examine the distinctions made between those reporting to have been involved in combat, and those recruited by armed contingents for other, usually domestic, purposes. In particular, the actions of Caritas Makeni will be discussed, given their significant role in receiving and assessing claims of child combatant status. The witness will place these claims in the context of the	43, 68	12	3 hours	English

No	MK o/ ame	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
93. Bri		conflict as it affected the Northern Province of Sierra Leone. He will further examine the recruitment policies of various fighting forces, as they are understood. Finally, he will critique the eligibility criteria used by aid agencies to consider entrance into rehabilitation and support programs, post-war. The witness will discuss about the command	14, 24, 25, 27,	1 - 18	4 hours	English
M Fur	_	structure of the RUF and the nature of the relations between the RUF and AFRC. He will also examine the command responsibility by the RUF for crimes allegedly committed by the AFRC/ SLA and the alleged responsibility of a RUF commander for crimes allegedly committed in a location under a different commander. He will examine the methods of command by Foday Sankoh over the RUF and the nature of relations between Foday Sankoh and the Field Commander of the RUF. He will further examine the implementation of the Lome Peace Accord by the RUF, AFRC/ SLA, CDF/ Kamajors and the Government of Sierra Leone. Finally he will analyse the alleged command responsibility of the Deputy Area Commander and Field Inspector within the RUF command structure.	28, 34, 36, 37, 42	1 - 10	4 nouts	Liigiisii

#### **RULE 92 BIS WITNESSES**

	Pseud onym/ Name	Description of expected testimony	Para Indictment	of	Indictment counts	Estimated time for testimony	Language
94.	DAB- 137	[Transcript from AFRC Trial: 2 October 2006]	41, 46, 78		3, 4, 5, 14	-	-
		Witness was in his village in Kenema District in May 1997. Witness first moved to Kenema when Kamajors attacked his village, and then proceeded to Bo. Witness testified that he saw the Kamajors when they entered his village. Witness said that while fleeing his village, he saw a nearby village, Konnelah that had just been burnt down. He saw Kamajors jubilating while coming from that village's direction. The witness said he attended a meeting called by the AFRC at the Bo town hall. He said that Kamajors were also present in Bo, based in an area called Gerehun. Witness said some Bo locals were sent to appeal to the Kamajors to end the conflict. Witness later heard that the Kamajors had killed them. He said that within this period, Kamajors constantly attacked Bo town and this caused him to move to Sembehun 17 village. Witness said he saw and identified the Kamajors himself. He said that several houses were burnt down, including a Muslim school very close to his own house. He said he witnessed many unlawful killings by the Kamajors. Witness said he heard that Kamajors killed chief					

	Pseud onym/ Name	Description of expected testimony	Para Indictment	of	Indictment counts	Estimated time for testimony	Language
		Demby of Gerehun. Witness said he visited his village, Sembehun 17, Tikonko Chiefdom in 1997. He said Kamajors later attacked the village, burning ten houses and killing two people. Witness said during this time, he never heard of RUF rebels been present in all the places he testified about.					
95.	DAB- 138	[[Transcript from AFRC Trial: 19 September 2006]  Witness said that in 1997, there was a fight between Kamajors and the AFRC soldiers in the township of Bo. He said in May/June 1997, Kamarjors harassed the people of Bo and killed those they perceived as AFRC collaborators. He said that even when they fled to Mile 19, Kamajors still harassed them there. He said that Kamajors were the ones killing people in Bo, including the town crier, a man named Zebra. Witness also recalls when the Kamajors hacked a soldier to death along Prince Williams Street. He said they also killed some of his friends, who they accused of sympathizing with the AFRC. Witness said on their way to Mile 91, Kamajors killed two boys at the Bo/Taiama highway because they were wearing black boots, thinking they were soldiers.	41, 42		3, 4, 5, 14		_
96.	Alex Tamba	[[Transcript from AFRC Trial: 6 June 2006 –	26, 43, 45,	77	3, 4, 5, 14	-	-

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Pseud	Description of expected testimony	Para	of	Indictment	Estimated	Language
onym/		Indictment		counts	time for	
Name					testimony	
Brima			· · · · ·			
aka	Witness' evidence relates to the composition					
Gullit	of the Supreme Council under the AFRC, the					
	burning of Kono in 1998 and the saving of the					
	witness' life by Kallon.					

#### ANNEX B

# KALLON DEFENCE BACK UP WITNESS CHART In compliance with Order 1(a) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

#### **BO WITNESSES**

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
1.	002	The Witness will testify that she met Kallon in Bo in 1997. Kallon stopped some soldiers harassing her. The Witness never heard about Kallon committing any of the crimes alleged in Bo.	37, 38	1 - 14	40 minutes	Krio
2.	040	The Witness was posted at Baiama Highway with Kallon from 1995 to 1996. He did not see Kallon commit any atrocities and will testify about Kallon's disciplinarian stance against RUF combatants who harassed civilians. He did not see Kallon use child combatants.	38, 43, 44, 68	1 - 14	1.5 hours	Krio

## **BOMBALI WITNESSES**

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
3.	018	The witness met Kallon in Makeni in 2000. Kallon punished combatants who were accused of harassing civilians. He can testify to Kallon's good relationship with civilians. The witness heard that Kallon was not involved in the UNAMSIL abductions but rather that it was other RUF combatants who were involved. Kallon promoted disarmament and the peace process.	37, 38, 44, 83	1 - 18	2 hours	Krio
4.	038	The witness is a RUF insider and worked as a G5. He will testify to Kallon's good relationship with civilians and Kallon's disciplinarian stance against RUF combatants who harassed civilians.	37, 38, 44	1 - 14	2 hours	Krio
5.	080	The witness will testify that he met Kallon in Makeni and saw him regularly pray in the mosque. The witness will testify to Kallon's good relationship with civilians in Makeni and his disciplinarian stance against RUF combatants who harassed civilians. The witness will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	37, 38, 44, 83	1 - 18	2 hours	Krio
6.	094	The witness will testify he met Kallon in 1998 and that he advocated peace among the civilians. He will testify that farming in the community was not forced. He will testify	37, 43, 69	1, 2, 13	1.5 hours	Krio

		about his knowledge of infighting between the RUF at this time.				
7.	105	The witness was a liaison between the RUF and the civilians in Makeni and will testify to the good relationship between civilians and the RUF in that area. The witness has knowledge that Kallon supported education initiatives in the area.	37	1 - 14	40 minutes	Krio
8.	106	The witness will testify to Kallon's good relationship with civilians and how Kallon supplied food to the witness. The witness did not experience burning of houses or sexual violence against women by the RUF while the RUF were in Makeni from 1998.	37, 54, 77, 80	1, 2, 6, 7, 8, ,9, 14	40 minutes	Kroi
9.	107	The witness will testify to the good relationship between the RUF and civilians in Makeni from 1998. A meeting was held and a warning given to RUF combatants that they should not harass civilians.	37	1 – 14	40 minutes	Krio
10.	108	The witness is a member of the RUF Political Party. She will testify that she joined as the RUF had treated civilians well. Kallon was involved in sensitising people about the party. She can testify about the good relationship between the RUF and civilians. The witness was instrumental in setting up an orphanage for abandoned children and Kallon supported this with donations.	37	1 – 14	1 hour	Krio
11.	109	The witness can testify about the good relationship between the RUF and civilians in Makeni.	37	1 – 14	30 minutes	Krio
12.	112	The witness will testify to Kallon's good relationship with civilians in Makeni. He did not see Kallon use child combatants.	36, 43, 68	1, 2, 12	40 minutes	Krio

13.	117	The witness met Kallon in Makeni at the	37	1 – 14	30 minutes	Krio
- 1		central mosque. He will testify about Kallon's	3			
		good relationship with civilians and how he				
		donated items to the mosque.				
14.	121	In 1991, the witness returned to Makeni to	37, 38, 41, 42,	4, 6, 15, 18	2 hours	Krio
1		find the RUF installed there. He was	43, 44, 45, 51,			
		persuaded by RUF commanders to stay with	54, 57, 61, 65,			
		his family. The witness states laws against	69, 73, 77, 81,			
		rape, murder and other atrocities were put in	83			
		place by the rebels, and these were enforced				
		by Kallon. Civilians were assisted, according				
		to the witness, with food and medicines -				1
		these were often distributed by Kallon				
		himself, as he did not have his own troops.				
		Witness recalls infighting among the RUF,				
		and states some commanders were involved				
		in attacks on the UN peacekeepers. Kallon,				
1		according to the witness, afterward helped put				
		this situation under control.				
15.	131	Witness was in Makeni in 1998 when RUF	37, 39, 43,	1, 2, 6, 7, 8,	1.5 hours	Krio
		rebels entered the town. Witness will testify	54, 77	9, 14		
		that while in Makeni, he liaised with the G5				
		office of the RUF. Witness states that Kallon				
		was based in Magburaka only visiting Makeni				
		infrequently. Witness will testify that Kallon				
		treated civilians with respect. Witness states				
		that no looting, rape or burning of houses took				
ľ		place.				

## KENEMA

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
16.	017	The witness is a RUF Insider. He was based in Tongo Field from 1997 and can give evidence as to the command structure there and which RUF combatants were responsible for mining activities.	69, 70	13	2.5 hours	Krio
17.	030	The witness is a RUF Insider. She first met Kallon in 1995. Kallon was a disciplinarian and would punish RUF combatants who harassed civilians. The witness was present at the killing of civilians at the Cyborg Pit and can testify that Kallon was not present or involved.	38, 44, 45, 47	1, 2, 3, 4, 5, 10, 11	2 hours	Krio
18.	045	The witness met Kallon in 2001, in Tongo Fields. There had been, according to the witness, problems there with certain RUF combatants and other RUF or ex-RUF renegades. The witness maintains that these people were harassing civilians, forcing them to mine and looting. Kallon, according to the witness, arrived in Tongo to investigate complaints about this, and removed the offending persons.	36, 37, 38, 43, 44, 69, 70, 77	1, 2, 13, 14	1.5 hours	Krio

# **KONO**

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
19.	041	The witness is a RUF Insider. She can testify about the retreat to Kono in 1998 and the burning of houses, stating Kallon was not present. The witness knew Kallon for 4 years and did not see him commit any atrocities.	36, 37, 77	1 – 14	2 hours	Krio
20.	046	The witness will testify he met Kallon in 1997 in Bo. He retreated to Kono with Kallon, the RUF and other civilian sympathisers. The witness can testify to his knowledge of the RUF command structure in Kono from 1998 to 1999. He can testify about Kallon's good relationship with civilians.	25, 37, 36	1 – 14	2.5 hours	Krio
21.	111	The witness is a RUF insider and will testify to the RUF command structure in Kono from 1998 to 1999. The witness will testify about his knowledge of the burning of Kono. The witness did not see Kallon use child combatants.	25, 43, 68, 77, 80	12, 14	2 hours	Krio

## TONKOLILI

:	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
22.	009	The witness was present in Tonkolili district when Kallon admonished RUF combatants that they should not commit atrocities. Kallon punished RUF combatants who would harass civilians. Kallon did not use civilians for forced labour.	38, 43, 69	1 - 14	-	-
23.	012	The witness is involved in the Ofeh society and can testify Kallon had a good relationship with members of the society and civilians.	41	1 - 14	30 minutes	Krio
24.	019	The witness will testify that he met Kallon in 1998 at Masingbi. Kallon told the RUF fighters not to kill the Kamajor fighters. Kallon ordered the release of some civilians who had been detained by RUF combatants Kallon was a strict disciplinarian who punished RUF combatants whenever they committed crimes.	37, 38, 44, 45	1, 2, 3, 4, 5, 10, 11	1 hour	Krio
25.	020	The witness will testify about Kallon's good relationship with civilians in Tonkolili district. The witness did not see Kallon committing any crimes alleged. Kallon disciplined RUF combatants who harassed civilians.	37, 38, 44	1 - 14	30 minutes	Krio
26.	034	The witness was a member of the Ofeh Society and can testify to Kallon's good relationship with civilians.	37	1 - 14	30 minutes	Krio
27.	036	The witness is a RUF Insider and met Kallon	18, 38, 54	1, 2, 6, 7, ,8	1.5 hours	Krio

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		in 1999 in Magburaka. The witness will testify that he did not see Kallon committing atrocities. Kallon was a strict disciplinarian and the witness saw him met out punishment to two RUF combatants who carried out acts of sexual violence.		,9		
28.	043	The witness will testify he met Kallon in Makali and that Kallon assisted the civilians there and had a good relationship with them.	37	1 - 14	30 minutes	Krio
29.	051	The witness will testify about Kallon's good relationship with civilians in Makali and that she did not see Kallon commit any atrocities against civilians.	37	1 - 14	30 minutes	Krio
30.	054	The witness will testify about Kallon's good relationship with civilians in Mobontor. The witness was assaulted by a RUF combatant and, following a complaint, the witness was informed that Kallon had instituted disciplinarian measures against the combatant.	37, 38, 44	1 - 14	30 minutes	Krio
31.	063	The witness will testify about Kallon's good relationship with civilians in Mobontor and how he used to admonish RUF fighters not to harass civilians. The witness never saw Kallon commit any atrocities.	37, 38	1 - 14	30 minutes	Krio
32.	099	The witness will testify about Kallon's good relationship with civilians in Makali. He will testify that civilians in that area were not forced to farm.	37, 43, 69	1 - 14	30 minutes	Krio
33.	101	The witness is a former SLA soldier. He will testify that he never saw Kallon commit any crimes alleged. He will testify that Kallon did not kill civilians or loot the Kono Bank	45, 77, 80	1, 2, 3, 4, 5, 10, 11, 14	2.5 hours	Krio
34.	103	The witness is a RUF insider. He will testify	25, 36, 69, 70	1, 2, 3, 4, 5,	3 hours	Krio

that Kallon was not responsible for mining	10, 11, 13,	
activities in Tongo Fields, Kenema. He will	15, 16, 17,	
also testify about the command structure in	18	
Kono from 1998 to 1999. He will further		
testify that Kallon spared the lives of some		
Kamajors who were captured in Magburaka		
and tried to promote peace in the area. He will		
testify that Kallon was not involved in the		
abduction of the UNAMSIL peacekeepers.		

3/19/2007

## **MULTI-DISTRICT**

	DMK No	Description of expected testimony	Para of Indictment	Indictment counts	Estimated time for testimony	Language
35.	003	The witness will testify that she worked with Kallon in the RUF and can testify to his good relationship with civilians. She did not see Kallon commit any of the crimes alleged. The witness will testify about the retreat to Kono and the command structure in Kono from 1998 to 1998.	25, 37	1 - 14	2.5 hours	Krio
36.	010	The witness will testify that he was arrested by some soldiers in Kono in 1998. The soldiers took his personal belongings and Kallon ordered that they be given back and he assisted the witness. The witness can testify to problems between Kallon and RUF leaders during this period. The witness can testify about Kallon's good relationship with civilians Kono and Magburaka. The witness did not see Kallon use child combatants or subject women to sexual violence. The witness will testify that Kallon was not involved in the attacks on the UNAMSIL peacekeepers.	37, 38, 43, 44, 54, 68, 83	1 – 18	2.5 hours	Krio
37.	011	The witness will testify that he was abducted by the RUF in 1993 and remained with the RUF during the war. He did domestic work for Kallon and did not take part in combat. He will describe how Kallon disciplined RUF combatants who harassed civilians. He will	38 ,44 ,68, 83	1, 2, 3, 4, 5, 12, 13, 15, 18	2 hours	Krio

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		state that Kallon did not kill a person for a sheep but rather disciplined one of his security guard's who looted the sheep from a civilian. Witness will state Kallon was not in charge of mining in Kono. He will further state Kallon was not involved with the abduction of the UN Peacekeepers and was			·	
		based in Magburaka at the time.				
38.	013	The witness is a RUF insider and will testify about the retreat from Makeni to Kono. He will also testify about the command structure in Kono from 1998 to 1999 and his knowledge of allegations, such as the killing of civilians and burning and looting of houses. Kallon did not use child combatants. Kallon was a strict disciplinarian against combatants and as a result was disliked by many combatants.	25, 38, 41, 43, 44, 48, 68, 80	1, 2, 3, 4, 5, 12, 14	3 hours	Krio
39.	015	The witness is a RUF insider and was a member of the Military Police. He will testify that Kallon was a disciplinarian against combatants who violated RUF internal laws. He did not see Kallon use sexual violence against women. He will testify to Kallon's good relationship with civilians. Kallon did not use child combatants. He did not witness Kallon force civilians to mine for him.	37, 38, 43, 44, 54, 69, 71	1, 2, 6, 7, 8, 9, 12, 13, 14	2.5 hours	Krio
40.	023	The witness will testify that he was abducted by the RUF as a schoolboy in Bo during 1997. He was taken to Kono, along with other boys. When he was taken to the battle front, Kallon stopped him and others from becoming combatants, and had the commander who brought them flogged.	38, 43, 44, 68, 83	12, 15, 16, 17, 18	2 hours	Krio

			T			
		Kallon assisted the witness. Meeting up with				
		Kallon later in Makeni, the witness saw him				
		unite underage boys with their families,				
		arranging passage for them through RUF				
		territory. The witness will further testify that				
		Kallon was not involved in the abduction of				
		the UNAMSIL peacekeepers.				
41.	026	The Witness will testify he met Kallon in	24, 25, 26, 36,	1, 2, 12	3 hours	Krio
		1996 at Bo Jungle and can speak about the	38, 41, 48, 55,		- 110 0110	
		command structure at that time, stating that				
		orders came from RUF officers senior to				
		Kallon. The witness will speak about RUF				
		internal laws against the harassment of				
		civilians and the resulting punishments should				
		these laws be violated. Kallon was a strict				
		disciplinarian to RUF combatants. Following				
		the AFRC coup the witness moved to Makeni.				
		He can speak about the rifts between the				
		AFRC and the RUF. The witness will also				
		testify about the command structure in Kono				
		from 1998 and Kallon's role. The witness did				
		not see Kallon use child soldiers.				
42.	047	The witness is a RUF insider. He met Kallon	37, 45, 83	1, 2, 3, 4, 5,	2 hours	Krio
		in 1992 and can testify to his good		15, 16, 17,		
		relationship with civilians. Kallon always		18		
		traveled with his family and extended family				
		members. He can testify that he did not				
		witness Kallon killing civilians. He can		_		
		further testify that Kallon was not involved in		-		
		the abduction of the UNAMSIL				
		peacekeepers.				
43.	060	The witness is a RUF Insider. He was posted	25, 34, 83	1, 2, 15, 16,	2 hours	Krio
		to Kono in 1998 and can detail the RUF		17, 18		
		command structure there from 1998 to 1999.		1,,10		
L	<u> </u>	1	l	l	L	I

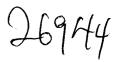
44.	061	He heard that the UNAMSIL abductions were committed by certain RUF combatants. Kallon's name was not mentioned.  The witness is a RUF Insider. She met Kallon at Kangari Hills in 1996 and can testify to the command structure there. She can testify that she did not see Kallon committing any crimes alleged. She did not see Kallon use child combatants.	25, 34, 68	1 - 14	1.5 hours	Krio
45.	062	The witness will testify that he was harassed by combatants. He made reports to Kallon who punished those who were involved.	38, 44	1 - 14	30 minutes	Krio
46.	064	Witness stayed with the RUF in Moyamba District for protection. When the RUF were pushed out she was afraid to stay behind and moved with them to Koribondo where she first met Kallon. She later traveled with the RUF to Freetown, Kailahun and later Kono. Witness states she traveled with the RUF voluntarily and was given food and medical care. Witness states that she stayed with her husband at Kallon's house, together with Kallon's family, and was a cook for them. Witness will testify that she did not see Kallon treat civilians badly and that civilians never complained about him.	37, 43, 69	1 - 14	40 minutes	Mende
47.	065	The witness is a RUF insider. He will testify that he met Kallon at Zogoda in 1994 and subsequently worked with him. Kallon was strict is meting out discipline to RUF combatants who committed crimes, such as looting, and the witness never saw Kallon committing any crimes. The witness was injured during an ambush and Kallon assisted	38, 44	1 - 14	1.5 hours	Krio

		the witness.				
48.	077	The witness is a RUF insider and will testify that he worked with Kallon in the jungle. He can testify to Kallon's disciplinarian stance against RUF combatants who harassed civilians and that, for this reason, many RUF combatants disliked Kallon.	38, 44	1 - 14	2 hours	Krio
49.	081	The witness will testify that he was captured by a Liberian rebel. He was rescued by Kallon who said that he was not allowing any underage boys to go to the war front. Kallon took the witness to live with him and his family until the witness was reunited with his family at the end of the war.	43, 68	12	1.5 hours	Krio
50.	085	The witness is a RUF insider and will testify that he was posted to Kono in 1998. He will give evidence of the RUF command structure there at that time. He was present when Kallon disciplined some combatants who had looted civilian property. He will testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	25, 38, 44, 83	1, 2, 14, 15, 16, 17, 18	2 hours	Krio
51.	086	The witness is a RUF insider and came to know Kallon in 1992. Kallon was a strict disciplinarian and was disliked by most combatants due to this.	38, 44	1 - 14	1.5 hours	Krio
52.	089	Witness was a member of the CDF Kamajor wing, and was jailed in Freetown in 1997 by the AFRC/ SLA. After escaping due to an appeal to Kallon, he went to Bo, where Kallon saved him again from the suspicion of soldiers who threatened to kill him as a Kamajor spy. Kallon moved him to Buedu, where he farmed, among others paid for their	38, 43, 44, 46, 69, 74, 83	4, 6, 7, 12, 15, 16, 17, 18	1.5 hours	Krio

53.	096	work. Witness described confrontations between Kallon and other RUF combatants over the former's disciplinary role. The witness will testify Kallon was not involved in the abduction of the UNAMSIL peacekeepers and that he had good relations with UNAMSIL personnel.  The witness will testify about Kallon's good relationship with civilians in Makeni and	37	1 - 14	30 minutes	Krio
54.	118	Magburaka.  The witness is a RUF insider. He met Kallon in Kailahun. He will testify that during the early part of the war in Sierra Leone, the Liberians faction of the RUF commanded influence. He will also testify that many Liberian RUF did not like Kallon because of his disciplinary stance against those RUF combatants who harassed civilians. The witness did not see Kallon commit any of the	38, 44	1 - 14	2 hours	Krio
55.	122	crimes alleged.  The witness is a RUF insider. He was informed about RUF internal laws against harassment of civilians and the ensuing punishments that would follow if these laws were violated In 1995 he was deployed to Kangari Hills with Kallon and can testify about the RUF command structure there at that time. The witness will testify about the retreat to Kono in 1998. He will testify that Kallon was against harassment of civilians, such as looting, and would discipline combatants who committed such acts. He will testify to Kallon's good relationship with civilians.	37, 38, 44	14	2.5 hours	Krio

56.	140	The witness was with Kallon in the North Jungle in 1996 and can testify to the command structure at that time. The witness can also testify about the command structure in Kono from 1998 to 1999. He states that civilians were not forced to mine and that those RUF combatants who raped, harassed civilians, burnt houses, or stole, were severely dealt with. The witness states that children were not forced to fight.	24, 25, 27, 28, 38, 43, 44, 68, 69	1, 2, 6, 10, 11, 12, 13, 14	3 hours	Krio
57.	150	The witness sought refuge with the RUF following an attack by Kamajors in Bo. She can testify to her good treatment by RUF commanders and their families. She met Kallon in Kono around 1998. She can testify that those RUF combatants who committed acts of sexual violence would be punished.	37, 38, 54	1, 2, 6, 8, 9	1.5 hours	Krio
58.	153	The witness is a RUF insider. He was based in Kono from 1998 and can testify about the RUF command structure there at that time. He can testify about Kallon's disciplinary stance against RUF combatants who committed crimes. The witness can testify that Kallon was not involved in the abduction of the UNAMSIL peacekeepers.	25, 38, 44, 83	1, 2, 15, 16, 17, 18	2 hours	Krio
59.	155	The witness is a RUF insider. He was a MP commander initially based in Kailahun and can testify about the functions of MP commanders to arrest those who went against the rules and regulations of the movement. The witness can testify about the retreat to Kono in 1998 and the command structure in place there from 1998 to 1999. The witness will testify about the breakdown in relations	25, 39, 41, 83	1, 2, 3, 4, 5, 15, 16, 17, 18	3.5 hours	Krio

	<del></del>	between the AFRC/ SLA and RUF. He will				
		also testify about infighting between different		}		!
1		factions in the RUF. The witness will testify				
		about his knowledge of the killing of civilians				
		in Tombodu and that Kallon was not				
		responsible. The witness will testify about the				
		abduction of the UNAMSIL peacekeepers and				
		that Kallon was not involved.				
60	.   156	The witness is a RUF insider. He first met	25, 37, 38, 43,	1, 2, 12	2.5 hours	Krio
		Kallon in the North jungle and can testify to	44			
		the command structure there. He can testify to				
		the good relationship between the RUF and				
		civilians at the time. The witness will testify				
		about the retreat to Kono in 1998 and the				
		RUF command structure at the time. The				
1		witness will testify to Kallon's good				
		relationship with civilians and his disciplinary				
		stance against RUF combatants who harassed				
		civilians. The witness did not see Kallon use				
		child combatants.				
61	. 157	The witness will testify that he willingly	25, 37, 38, 41,	1, 2, 7, 12,	2.5 hours	Krio
01	.   157			1 ' ' '	2.5 Hours	KIIO
		joined the RUF. He was based in Kailahun	43, 44, 68	14		
		and then Kenema. He retreated to Kono in			:	
		1998 and can give evidence about the				
		command structure there. He can describe				
ĺ	1	lack of co-operation between the RUF and		}		
		SLA. Kallon had a good relationship with				
ļ		civilians. The witness states that he did not				
		see the use of child combatants or occurrences				
		of "forced marriage". He describes RUF				
		internal laws against harassment of civilians				
		and the resulting punishments should this be				
		violated.				1



#### ANNEX C

## In compliance with Order 1(b) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

The Kallon Defence provide notice that the accused, Morris Kallon, will testify pursuant to Rule 85(c).

#### ANNEX D

#### KALLON DEFENCE EXPERT LIST

### In compliance with Order 1(c) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

	Name	Description of Evidence	Estimated Date of Disclosure of
			Expert Report
1.	Mr Maurie G Ellie	The witness will discuss the agencies involved in DDR programs, and the activities they employed to verify the ages of supposed excombatants. He will examine the distinctions made between those reporting to have been involved in combat, and those recruited by armed contingents for other, usually domestic, purposes. In particular, the actions of Caritas Makeni will be discussed, given their significant role in receiving and assessing claims of child combatant status. The witness will place these claims in the context of the conflict as it affected the Northern Province of Sierra Leone. He will further examine the recruitment policies of various fighting forces, as they are understood. Finally, he will critique the eligibility criteria used by aid agencies to consider entrance into rehabilitation and support programs, post-war.	16 July 2007
2.	Brigadier Michael M Fundi	The witness will discuss about the command structure of the RUF and the nature of the relations between the RUF and AFRC. He will also examine the command responsibility by the RUF for crimes allegedly committed by the AFRC/ SLA and the alleged responsibility of a RUF commander for crimes allegedly committed in a location under a different commander. He will examine the methods of command by Foday Sankoh over the RUF and the nature of relations between Foday Sankoh and the Field Commander of UNAMSIL, General Jetley. He will further examine the implementation of the Lome Peace Accord by the RUF, AFRC/ SLA, CDF/ Kamajors and the Government of Sierra Leone. Finally he will analyse the alleged command responsibility of the Deputy Area Commander and Field Inspector within the RUF command structure.	13 August 2007

#### ANNEX E

26946

#### **COMMON WITNESSES**

In compliance with Order 1(e) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

At the moment of filing, the Kallon Defence are not in a position to say which witnesses are common witnesses. Please see correspondence sent by Kallon Defence Team and reply attached thereto.



To: SCSL Defence-Sesay/SCSL@SCSL, SCSL Defence-Gbao/SCSL@SCSL

cc: mnwlaw@yahoo.co.uk, sesayalpha@yahoo.com

Subject: Common Witnesses

Subject. Commit

Dear Counsel,

Shekou Touray, Lead Counsel, has requested that the RUF teams confer with each other concerning common witnesses. It is his suggestion that we share witness lists with a view to ascertaining which witnesses may be common and then discussing how to use these respective witnesses.

Kindly get back to me as soon as possible.

Kind regards,

Alpha Sesay Legal Assistant 2

Defence Team for Morris Kallon Room 14 A6 Special Court for Sierra Leone +232 (0) 2229 7154 SCSL Defence-Gbao 27/02/2007 14:41

To: SCSL Defence-Kallon/SCSL@SCSL

cc: Subject: Re: Common Witnesses

Hi

I have forwarded the email to the counsels, I will come back to you as soon as I hear from them.

best regards

lea

#### ANNEX F

#### KALLON EXHIBIT LIST

#### In compliance with Order 1(e) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

	DMK Exhibit No	Item	Content	Relevance (by Indictment paragraph number)
1.	1	Letter	Letter from DMK-008 to Lt. Col Chilcumbi, Commander Zambatt, 4/9/01	41, 83
2.	2	Letter	Letter from RUF HQ to DMK-008, 8/3/01	24, 25, 27, 28, 39
3.	3	Draft report	Draft report by DMK-008 on UNAMSIL Team, 24/3/00	41, 83
4.	4	Letter	Letter from Sesay to American Ambassador to Sierra Leone, 16/6/01	68
5.	5	Letter	Letter from Organisation for Peace, Reconciliation & Development to Sesay, 9/6/01	24, 25, 28
6.	6	Report	Report by RUFP regarding Cease-Fire Violations by the SLPP Government	37, 41, 42, 44
7.	7	Manifesto	Manifesto of the RUFP	43, 44
8.	8	Report	Final Report of ECOWAS, UN and RUF Meeting, 10/11/00	14, 41
9.	9	Letter	Letter to Sesay from Lt Col Peter Jusu, 22/4/01	37
10.	10	Letter	Letter to Sesay from Lt Col Peter Jusu, 20/4/01	37, 43
11.	11	Report	Report by Humanitarian Coordinating Office, RUF, 20/2/01	24, 25
12.	12	Report	Report by Humanitarian Coordinating Office, RUF, 29/3/01	37, 68
13.	13	Report	Report by Humanitarian Coordinating Office, RUF, 2/4/01	37, 68
14.	14	Report	Report by Humanitarian Coordinating Office, RUF, 28/5/01	41
15.	15	Letter	Letter from Lt Patrick to Lt Francis Ganawa	41, 42
16.	16	Letter	Letter from Col Mingo to All Officers, 30/3/98	43, 69
17.	17	Notes	Handwritten notes by DMK-035 and his Clerk of RUF 11 General Orders and Standing Orders Guiding RUF/SL Operations	43, 44, 68, 69
18.	18	Radio Transcript	Transcript of Julius Spencer on 98.1 Radio, Nov 1997 (Julius Spencer reading statements of Steven Bio and Gibril Massaquoi)	24, 26, 34

# Annex G In compliance with Order 1(f) of the Scheduling Order Concerning the Preparation and the Commencement of the Defence Case

Indictment Paragraph	Testimonial evidence (DMK No)	Documentary evidence (DMK Exh No)
Number		
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.	Brig. Fundi (Expert)	8
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.	001, 004, 006, 007, 008, 014, 025, 026, 029, 035, 042, 052, 056, 057, 071, 076, 087, 093, 097, 116,	2, 5, 11, 18
	130, 134, 140, 142, Brig. Fundi (Expert)	
25.	001, 003, 004, 006, 007, 013, 014, 025, 026, 029,	2, 5, 11
}	032, 033, 039, 046, 048, 049, 050, 052, 053, 056,	}
	058, 060, 061, 069, 071, 075, 078, 085, 087, 092,	
	097, 103, 111, 114, 127, 130, 133, 134, 140, 141,	

asbit

	148, 151, 153, 155, 156, 158, 157, Brig. Fundi	
	(Expert)	
26.	006, 026, 029, 056, 071, 136, Alex T. Brima	18
27.	001, 004, 006, 007, 008, 025, 029, 049, 056, 071,	2
	075, 130, 136, 140, 142, Brig. Fundi (Expert)	
28.	001, 004, 006, 007, 008, 025, 029, 049, 056, 071,	2, 5
	075, 130, 136, 140, 142, Brig. Fundi (Expert),	
29.		2
30.		
31.		
32.		
33.		
34.	004, 006, 007, 008, 014, 025, 027, 029, 039, 049,	18
	052, 053, 055, 056, 060, 061, 071, 093, 133, 136,	
	142, Brig. Fundi (Expert),	
35.	006, 007, 008, 137, 143	
36.	004, 006, 007, 008, 014, 026, 027, 029, 039, 041,	
	045, 046, 049, 052, 055, 056, 067, 071, 073, 087,	
	088, 093, 103, 104, 135, 138, 142, Brig.	
	Fundi(Expert),	
37.	001, 002, 003, 004, 006, 007, 008, 010, 014, 015,	6, 9, 10, 12, 13
	018, 019, 020, 025, 027, 031, 033, 034, 037, 038,	
	039, 041, 043, 044, 045, 046, 047, 049, 050, 051,	
	052, 054, 055, 056, 058, 059, 063, 064, 067, 071,	
	074, 075, 079, 080, 082, 084, 087, 088, 093, 094,	
	095, 096, 098, 099, 104, 105, 106, 107, 108, 109,	
	110, 112, 113, 114, 117, 119, 120, 121, 124, 126,	
	131, 135, 136, 142, 144, 148, 150, 152, 154, 156,	
	157, 158, Brig. Fundi (Expert)	
38.	002, 004, 006, 007, 008, 009, 010, 011, 013, 015,	
	016, 018, 019, 020, 021, 023, 024, 025, 026, 028,	
	029, 030, 036, 038, 039, 040, 042, 044, 045, 048,	
	049, 050, 052, 053, 054, 056, 057, 058, 059, 062,	
	063, 065, 067, 069, 070, 071, 072, 075, 076, 077,	
	079, 080, 084, 085, 086, 087, 088, 089, 090, 092,	
	093, 097, 098, 100, 104, 115, 116, 118, 120, 121,	
	122, 125, 126, 130, 132, 133, 134, 135, 136, 137,	
	140, 141, 142, 144, 148, 150, 151, 152, 153, 156,	

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	157, 156, 158	
39.	004, 006, 007, 008, 025, 027, 028, 029, 052, 055,	
	056, 071, 072, 076, 092, 097, 114, 116, 125, 131,	
	134, 135, 136, 137, 155	
40.		1
41.	001, 004, 006, 007, 008, 012, 013, 014, 021, 025,	3, 6, 8, 14, 15
	026, 027, 029, 039, 049, 052, 055, 056, 057, 069,	
	071, 072, 076, 082, 087, 088, 090, 092, 093, 113,	
	114, 116, 120, 125, 132, 133, 134, 135, DAB137,	
	DAB138, 141, 142, 143, 148, 151, 155, 157, 158	
42.	004, 006, 007, 008, 014, 025, 027, 029, 039, 049,	6, 15
	052, 055, 056, 057, 071, 072, 084, 087, 088, 090,	
	092, 093, 113, 116,120, 121, 125, 137, DAB138,	
	142, 143, Brig. Fundi (Expert),	
43.	004, 006, 007, 008, 009, 010, 013, 014, 015, 023,	7, 10, 16, 17
	024, 025, 027, 029, 031, 039, 040, 045, 049, 052,	
	055, 056, 058, 059, 064, 067, 072, 075, 076, 079,	
	081, 082, 084, 087, 089, 090, 093, 094, 095, 097,	
	098, 099, 100, 104, 111, 112, 113, 114, 115, 116,	
	119, 120, 121,125, 131, 132, 137, 138, 140, 142,	
	148, 152, 154, 156, 157, 158, Mr. Maurie Ellie,	
	Alex Brima	
44.	004, 006, 007, 008, 010, 011, 013, 014, 015, 016,	6, 7. 17
	018, 019, 020, 021, 023, 024, 025, 027, 029, 030,	
	035, 036, 038, 039, 040, 042, 045, 046, 049, 050,	
	052, 053, 054, 055, 056, 057, 058, 059, 061, 063,	
	067, 069, 070, 071, 072, 075, 076, 077, 079, 080,	
	082, 084, 085, 086, 087, 088, 089, 090, 092, 093,	
	097, 104, 113, 115, 118, 120, 121, 122, 125, 126,	
	127, 130, 132, 133, 134, 135, 136, 137, 140, 141,	
	142, 151, 152, 153, 154, 156, 157, 158	
45.	006, 007, 008, 019, 025, 030, 033, 042, 047, 084,	
	090, 101, 113, 120, 121, 127, 142	
46.	042, 055, 089, DAB137, DAB138	
47.	030, 042, 091	
48.	006, 013, 026, 027, 029, 039, 042, 052, 056, 057,	
	076, 084, 091, 092, 142,	
49.	025, 042	

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50.	006, 042,	
51.	004, 026, 027, 049, 056, 113, 120, 121, 042,	
52.	042,	
53.	DAB138, 042,	
54.	006, 007, 008, 010, 014, 015, 025, 036, 039, 042,	
	052, 084, 097, 106, 113, 120, 121, 131, 142, 150	
55.	026, 027, 029, 039, 052, 056, 076, 084, 091, 142	
56.	042,	
57.	004, 026, 027, 042, 049, 056, 113, 120, 121	
58.	025, 042	
59.	042	
60.	042	
61.	006, 007, 042, 008, 084, 113, 120, 121, 138, 142	
62.	026, 027, 029, 039, 042, 052, 056, 076, 084, 142	
63.	042, 091	
64.	042,	
65.	004, 026, 027, 042, 049, 056, 113, 120, 121,	
66.	042,	
67.	042,	
68.	004, 006, 007, 008, 010, 011, 013, 014, 023, 026,	4, 12, 13, 17
	027, 031, 035, 040, 042, 044, 052, 055, 056, 058,	
	059, 061, 069, 075, 076, 081, 091, 095, 098, 100,	
	110, 111, 112, 113, 115, 116, 120, 132, 140, 145,	
	148, 152, 156, 157, 158, Mr. Maurie Ellie	
69.	006, 007, 008, 009, 014, 015, 017, 024, 025, 042,	16, 17
	045, 052, 058, 064, 067, 073, 074, 084, 089, 090,	
	093, 094, 097, 099, 103, 104, 113, 116, 120, 121,	
	142, 140, 152, 154,	
70.	006, 008, 017, 042, 045, 067, 091, 103, 104	
71.	006, 015, 026, 027, 029, 039, 042, 056, 062, 073,	
	074, 084, 091, 142,	
72.	042,	
73.	004, 026, 027, 042, 049, 056, 113, 120, 121,	
74	025, 042, 089, 137	
75.	042	
76.	042	

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77.	006, 007, 008, 028, 032, 041, 042, 045, 073, 078,	
' ' '	084, 087, 088, 093, 097, 098, 101, 106, 111,	
· · · · · · · · · · · · · · · · · · ·	113,120,121, 131, 134, 142, Alex T. Brima	
78.	042, 055, DAB137	
79.		
80.	006, 013, 026, 027, 028, 029, 042, 045, 052, 056,	
	057, 071, 073, 077, 087, 088, 098, 101, 106, 111,	
	134, 142,	
81.	004, 026, 027, 042, 049, 056, 113, 120, 121,	
82.	042	
83.	006, 007, 010, 011, 014, 018, 023, 028, 031, 033,	1, 3
	035, 037, 039, 044, 046, 047, 049, 056, 057, 060,	
	069, 073, 074, 076, 077, 080, 082, 085, 087, 089,	
	090, 093, 095, 100, 110, 113, 119, 121, 125, 129,	
	130, 132, 133, 134, 135, 138, 144, 145, 146, 147,	
	153, 153, 155	

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#### ANNEX H

AGREED STATEMENT OF FACTS BETWEEN THE SECOND ACCUSED AND THE PROSECUTION IN COMPLIANCE WITH ORDER 3 OF THE SCHEDULING ORDER CONCERNING THE PREPARATION AND THE COMMENCEMENT OF THE DEFENCE CASE

- 1. During the period 1991 to 1993, the leadership of the RUF included persons such as: Foday Sankoh, Rashid Mansary, and Mohammed Tarawallie.
- Prior to 25 May 1997, the RUF had been pushed by the Civil Defence Forces (CDF) and Kamajors out of most of the territory of the Republic of Sierra Leone and some of the RUF entered into Liberia.
- 3. The Supreme Council was the highest decision-making body of the junta.
- 4. Mike Lamin returned with some RUF combatants, that had been pushed by the CDF and Kamajors to Liberia, back to Sierra Leone and Freetown in mid- 1997.
- 5. Morris Kallon did not form part of the group who travelled from Kono to Koinadugu to Camp Rosos with Gullit and others.
- 6. During the AFRC junta Eddy Kanneh was appointed Secretary of State East based in Kenema.
- 7. During the latter part of 1997 and early part of 1998, Mosquito resided in Kenema and was the most senior RUF commander in that district.
- 8. During the latter part of 1997 the Secretary of State South at Bo was A. F Kamara while the AFRC Army Brigade commander was Boysie Palmer.
- 9. Between 14 February 1998 and 30 September 1998, Morris Kallon was not a RUF and /or AFRC field commander in any location in Koinadugu district, and did not reside there.

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- 10. Between 1 May 1998 and 30 November 1998, Morris Kallon was not a RUF and /or AFRC Field Commander in any location in Bombali District, and did not reside there.
- 11. There existed in the RUF a War Council.
- 12. During the peace process after the Lome Peace Agreement, the War Council was transformed into the Peace Council.
- 13. There existed a system of communication within the RUF in which every radio operator was supposed to keep a radio log book into which he was supposed to enter all the communications received and sent.
- 14. The code names for Kallon included Friend and Sparrow.

Dated 5 March 2007.

Peter Harrison

Office of the Prosecutor

Shekou Touray

Lead Counsel 1, Kallon Defence Team