



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 11 FEBRUARY 2008
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr William Romans
Ms Sidney Thompson

For the Registry:

Ms Rosette Muzigo-Morrison
Ms Rachel Irura

For the Prosecution:

Ms Brenda J Hollis
Mr Nicholas Koumjian
Mr Alain Werner
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Terry Munyard
Mr Morris Anyah

1 Monday, 11 February 2008

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:29:48 5 PRESIDING JUDGE: Good morning. I note some changes in
6 appearances, Mr Werner.

7 MR WERNER: Madam President, your Honours, good morning.
8 For the Prosecution this morning: Brenda J Hollis, Nicholas
9 Koumjian, Alain Werner and Maja Dimitrova.

09:30:12 10 PRESIDING JUDGE: Thank you, Mr Werner. Mr Munyard?

11 MR MUNYARD: Good morning, Madam President and your
12 Honours. This morning myself, Terry Munyard, and Morris Anyah.
13 We are expecting Mr Griffiths and I know he is nearby. The
14 difficulty is that as 9.30 approached my efforts to make further
09:30:29 15 contact with him were defeated by the fact that you can't use
16 mobile telephones within this area of the Court. I would have
17 been outside of court when your Honours came in if I had actually
18 tried any further to get in touch with him. I know he is
19 physically very close to the building, if not in it, but he will
09:30:50 20 not be able to robe because both Mr Anyah and I have keys to our
21 robing room, which we have locked for security reasons, so it may
22 well be that it is not until the mid-morning break that we are
23 able to get him inside the courtroom in robes.

24 PRESIDING JUDGE: Very well, Mr Munyard. We are in the
09:31:10 25 midst of evidence in any event, so the presentation of these
26 exhibits, or proposed exhibits, will have to be deferred further.

27 MR MUNYARD: Very well, your Honour.

28 PRESIDING JUDGE: If there are no other matters I will
29 remind the witness of his oath and we will proceed. Mr Witness,

1 you recall that you took the oath to tell the truth in this
2 Court. That oath is still binding on you and you must answer
3 questions truthfully. Do you understand?

4 THE WITNESS: Yes, I can remember, I can remember.

09:31:47 5 PRESIDING JUDGE: Thank you, Mr Witness. Mr Werner, please
6 proceed.

7 WITNESS: TF1-548 [On former oath]

8 EXAMINATION-IN-CHIEF BY MR WERNER [Continued].

9 MR WERNER: Thank you, Madam President:

09:32:00 10 Q. I would like to first correct two spellings. We reviewed
11 the transcript on Friday and I spelt some names and two of these
12 names are not correctly spelt in the transcript and it can well
13 be my French accent. I am just going to go over the names again.
14 It is page 40 of the transcript. The first name was Dopoe
09:32:33 15 Menkarzon and the first name, Dopoe, is spelt wrongly in the
16 transcript and the correct spelling is D-O-P-O-E. The second one
17 is Joe Montgomery, which is spelt Montgomtery in the transcript,
18 so the correct spelling of Montgomery, page 40 in the transcript
19 as well, would be M-O-N-T-G-O-M-E-R-Y:

09:33:05 20 Q. Good morning, Mr Witness.

21 A. Tell him good morning.

22 PRESIDING JUDGE: Mr Witness, are you having a problem
23 hearing the interpreter?

24 THE WITNESS: No, I have no problem, but my speaker is not
09:33:34 25 functioning. I am greeting you.

26 MR WERNER:

27 Q. Mr Witness, you told us on Friday that after the meeting
28 with the Gambians you spent two weeks with Mustapha Jallow in
29 Zorzor. Do you remember that?

1 A. Yes, I can remember it.

2 Q. You said that you were his assistant and you worked as
3 security for FATCO and ATCO companies. Do you remember that?

4 A. Yes.

09:34:29 5 Q. Now, it was not clear in the transcript when that happened,
6 which year, if you can remember?

7 A. Yes, it happened in 1992 in January, at the beginning.

8 Q. Thank you, Mr Witness. Now, on Friday as well you said
9 that in 1992 NPFL General 245 came to Cobra Base to collect

09:35:18 10 recruits on two occasions. Do you remember that?

11 A. Tell me the year, 19 what?

12 Q. On Friday you testified that that happened in 1992.

13 A. Yes, 1992.

14 Q. And you said, on Friday, that at that time General 245 was
09:35:46 15 based in Lofa County at the border between Sierra Leone and
16 Liberia. Do you remember that?

17 A. Yes, I can remember. It was that time.

18 Q. And you said that the first time she came to collect
19 recruits at Cobra Base she collected two companies comprised of
09:36:12 20 Sierra Leoneans and Liberians, and the second time she came she
21 collected one company comprised of Sierra Leoneans and Liberians,
22 and talking about the first time she came, you said that when she
23 took these two companies the information you got was that the
24 recruits went to Sierra Leone in a place called Daru.

09:36:48 25 A. Yes, that was what I told you.

26 Q. My question is this, Mr Witness: What, if anything, did
27 you learn about the reason why these recruits were taken to Daru
28 in Sierra Leone at that time?

29 MR MUNYARD: Can we learn when and from whom because he

1 might have learnt something last week about this. We need to be
2 specific if we are going to have sweeping hearsay questions of
3 this sort.

4 PRESIDING JUDGE: That is correct, Mr Werner.

09:37:23

5 MR WERNER:

6 Q. Mr Witness, when did you learn that information about the
7 recruits being taken to Daru?

8 A. Tell him that was not the news. It happened in my
9 presence. She came to collect them from our training base.

09:37:45

10 Q. But the fact that these recruits were taken to Daru, when
11 did you learn that?

12 A. Tell him this happened in the year 1992.

13 Q. What, if anything, did you learn about the reason why these
14 recruits were taken to Daru?

09:38:18

15 A. Tell him that not only those people, NPFL soldiers and RUF
16 soldiers, were fighting at the time. RUF was a brother to NPFL.
17 RUF soldiers were younger brothers to NPFL.

18 Q. And, if you know, when they were taken to Daru to what
19 group were they assigned?

09:39:07

20 A. Tell him they were with RUF soldiers. They went there to
21 help them.

22 Q. Concerning the recruit of the second batch that General 245
23 collected in Cobra Base, one company, where did they go?

24 A. Tell him they also went to Sierra Leone to help RUF.

09:39:39

25 Q. Where in Sierra Leone?

26 A. Tell him I was not in Sierra Leone, but the recruits who
27 returned, the ones I saw, what they told me was that they went to
28 Daru barracks.

29 Q. To what group were they assigned in Daru barracks, the

1 second batch?

2 A. They went to join RUF.

3 Q. Now, on Friday you said that after the two weeks you spent
4 with Mustapha Jallow in Zorzor you took your assignment at

09:40:32 5 Cobra Base as an instructor and then you said that Cobra Base was
6 your permanent assignment, but sometimes you went for TDY

7 assignment. Do you remember saying that?

8 A. Tell him yes, I said that.

9 Q. And how many times were you on TDY?

09:41:02 10 A. Tell him that in that two weeks, upon my return I went back
11 and spent two weeks for TDY.

12 PRESIDING JUDGE: I still am not clear what TDY is.

13 MR WERNER:

14 Q. Mr Witness, what does TDY stand for, if you know?

09:41:30 15 A. That is the temporal duties of the year.

16 Q. I understood him saying temporary duties of the year. On
17 the LiveNote it is temporary duty of the day, so I am going to
18 ask him again.

19 MR MUNYARD: He did say year. I don't think there is any
09:41:54 20 doubt about it.

21 JUDGE SEBUTINDE: I didn't hear what he said. Please ask
22 again.

23 MR WERNER:

24 Q. Mr Witness, could you tell the Court again what does TDY
09:42:07 25 stand for, slowly if you can?

26 A. I said temporal duties of the year.

27 Q. So, could you explain - when you say you went on TDY, what
28 do you mean? Can you explain further?

29 A. That is the places you go to work, not permanent place of

1 work. Just you go there and come back.

2 Q. So you came back to Cobra Base and then you said - how long
3 did you stay in Cobra Base when you came back from the two weeks
4 in Zorzor?

09:43:10 5 A. Tell him that our first battalion, we train our first
6 battalion. When we train our second battalion, then we return to
7 Lofa and spend TDY here.

8 Q. Then when you say "we return to Lofa" who are you talking
9 about?

09:43:35 10 A. I said myself. When I do the thing - when I was at
11 Cobra Base I train one battalion, the first battalion. When we
12 were training our first battalion that was the time I was - they
13 return me to Lofa where I spent three months TDY.

14 Q. Who, if anyone, told you to return to Lofa?

09:44:14 15 A. Tell him that Mustapha came with a paper to the base and
16 told me to go for an assignment, but he came with the paper from
17 our SSS office because that time he was the only one who was
18 staying there and he thinks that he needs somebody who is
19 supposed to be with him.

09:44:43 20 Q. When you say Mustapha, who are you talking about?

21 A. I am referring to General Mustapha Jallow.

22 Q. And when did that happen?

23 A. Tell him, tell him this was in 1982, early part of 1982 -
24 1992, sorry.

09:45:17 25 Q. So what did you do after that, if anything?

26 A. I was at Lofa, TDY, as his assistant at FATCO company near
27 Zorzor where our base was.

28 Q. What, if anything, did you see during your time there with
29 Mustapha Jallow?

1 A. Tell him that at that time during my TDY we kept the
2 security of the company and also we have a ghetto on the road
3 where the soldiers used to keep - make a --

09:46:28

4 THE INTERPRETER: Your Honours, may the witness be asked to
5 repeat that bit of his evidence.

6 PRESIDING JUDGE: Mr Witness, the interpreter needs you to
7 repeat the last part of your reply again, please. I have noticed
8 you said "during TDY we kept security of the company", please
9 continue from there.

09:46:57

10 A. I said at that time we kept security, ATCO and FATCO
11 company security. We were responsible for that. Also we have a
12 ghetto on the road, a ghetto on the highway, for the people who
13 used to pass. We check them.

14 MR WERNER: I am going to clarify.

09:47:25

15 PRESIDING JUDGE: Mr Werner, several things I don't -
16 I suspect it may be the interpretation rather than the answer,
17 but I don't really understand the expression "we keep security of
18 the company" and I don't know what a get tow on the highway is.

19 MR WERNER:

09:47:43

20 Q. So, Mr Witness, what do you mean when you said that you
21 kept security ATCO and FATCO. Could you explain that again?
22 What do you mean?

23 A. Tell him we were responsible for the security of the
24 company. We have soldiers who are members of NPFL who were
09:48:08 25 working under us, not only I and Mustapha were there alone.
26 Those soldiers will mind the things of the company so that
27 nothing will happen to those things and also we have a gate on
28 the road that is for controlling the people who go and come from
29 Gbarnga.

1 Q. I think we are clear now on the gate. There is still one
2 thing that does not seem to be clear: What do you mean when you
3 said that those soldiers will mind the things of the company.
4 What do you mean?

09:49:07 5 JUDGE SEBUTINDE: Maybe it is look after, or take care. It
6 is not "remind", but "will mind".

7 MR WERNER: Yes.

8 THE WITNESS: We were responsible for the security. We are
9 responsible for their security.

09:49:33 10 MR WERNER:

11 Q. You said that concerning the gate, the gate was for
12 controlling the people who go and come from Gbarnga at that time.
13 Who, if anyone, did you see going and coming from Gbarnga?

14 A. Tell him that at that time people used to come from Sierra
09:50:03 15 Leone and go to Gbarnga who were RUF soldiers. They go there and
16 take their supplies and take it to Sierra Leone. I witnessed
17 that while I was there.

18 Q. When you say that people used to come from Sierra Leone and
19 go to Gbarnga, they were RUF soldiers, who were these RUF
09:50:37 20 soldiers, if you know, at that time?

21 A. Tell him that the one I saw there who used to come there
22 most of the time that is Sam Bockarie, commonly known as
23 Mosquito. Most of the time he was the one who used to come there
24 with RUF soldiers and go to Gbarnga and when they are coming from
09:51:09 25 Gbarnga our NPFL soldiers used to - I can tell our NPFL soldiers
26 used to guard them and I can tell you some of the names of our
27 NPFL soldiers. They are the ones who used to escort them up to
28 the border of Sierra Leone.

29 JUDGE SEBUTINDE: Mr Interpreter, did you say guide or

1 guard?

2 THE INTERPRETER: Guard.

3 THE WITNESS: I said they are the ones that guard them.

4 MR WERNER:

09:51:54 5 Q. What do you mean when you said they are the ones who guard
6 them?

7 A. They are the ones that used to escort them, our NPFL
8 soldiers.

9 Q. When you said "them", who are them? "Escort them", who
09:52:14 10 were they escorting?

11 A. Tell them this was - if I can remember, this was more than
12 three times that I witnessed when Momoh Jibba escorted - to
13 escort these RUF soldiers to Sierra Leone. I can remember
14 General Yeaten also escorted Mosqui to up to Sierra Leone border.

09:52:48 15 Q. Just wait there, Mr Witness. So, Momoh Jibba was already
16 spelt as well as General Yeaten.

17 Now, Mr Witness, you said as well that the RUF soldiers
18 used to take their supplies from Gbarnga; which supplies are you
19 talking about?

09:53:22 20 A. Tell him I mean arms and ammunitions.

21 Q. How did you know that at that time?

22 A. Tell him at that time when they are coming from Gbarnga
23 they communicate with us because we had a communication set at
24 that time to inform us that RUF soldiers are coming and they are
09:54:01 25 going.

26 Q. Mr Witness, pause there. When you say "they came", "they
27 communicated with us", who are you talking about?

28 A. That is Mansion Ground at Gbarnga. NPFL soldiers used to
29 communicate with us.

1 Q. Mr Witness, you said that you saw RUF soldiers and you said
2 that you saw Sam Bockarie, Mosquito. What do you mean when you
3 say Sam Bockarie, Mosquito?

09:54:55

4 A. Tell him his name is Sam Bockarie, commonly known as
5 Mosquito and also on one occasion Sankoh himself was among the
6 delegates that went to Gbarnga during my stay there. On this
7 occasion he himself came with them to Gbarnga and when they were
8 going home he came with them, Foday Sankoh himself. They passed
9 us at Lofa and went to Sierra Leone.

09:55:38

10 Q. And where did you see Foday Sankoh?

11 A. I said when I was at Lofa, during my TDY at Lofa.

12 Q. You said that they transported arms and ammunition from
13 Gbarnga. How did they transport arms and ammunition from Gbarnga
14 at that time?

09:56:08

15 A. No, I said they used to take arms and ammunition from
16 Gbarnga and take it to Sierra Leone, RUF soldiers.

17 Q. How did they do that? How did they take the arms and
18 ammunition from Gbarnga to Sierra Leone?

09:56:30

19 A. Tell him that they used to put them in a vehicle, in a
20 double cabin pick up, and on many occasions they used to cover
21 them.

22 Q. Sorry, Mr Witness, what do you mean when you say they used
23 to cover them?

09:56:59

24 A. They used to cover it for civilians, so that the civilians
25 would not see them. [Microphone not activated] problem, but
26 nothing was hidden from us.

27 Q. If you know, which route did they take when they took this
28 arms and ammunition from Gbarnga to Sierra Leone?

29 A. Tell him they used Lofa main road that came from Lofa going

1 to Boya, the highway.

2 Q. Mr Witness, you said they used Lofa main road coming from
3 Lofa going to Boya? What is Boya?

4 A. Voijnama going to Foya.

09:58:04 5 Q. So I will try to clarify that. From Gbarnga, if you know,
6 where did they go?

7 A. I said when they come from Gbarnga they used to go through
8 Zorzor to Voijnama going to Sierra Leone.

9 MR WERNER: Your Honours, the only location which was not
09:58:32 10 spelt, as far as I know, was Voijnama which would be
11 V-O-I-N-J-A-M-A:

12 Q. Now, Mr Witness, during --

13 THE INTERPRETER: Your Honours, some of the names of the
14 towns were left out by the interpreter.

09:59:07 15 PRESIDING JUDGE: Do you mean during an answer, or do you
16 mean during a question?

17 THE INTERPRETER: During the answer from the witness.

18 PRESIDING JUDGE:

19 THE INTERPRETER: Yes, the last answer.

09:59:17 20 PRESIDING JUDGE: I will ask the witness to repeat the
21 answer and let us have it correctly interpreted.

22 Mr Witness, the interpreter says he omitted some place
23 names, names of towns, in your last answer. Can you please
24 repeat your answer.

09:59:39 25 THE WITNESS: I said when they came from Gbarnga, on the
26 highway, they came to Zorzor and on that same highway they
27 continued, they went to Voijnama and using that same highway they
28 went to Foya. From there they went to the Sierra Leone border.

29 PRESIDING JUDGE: Thank you. Please proceed, Mr Werner.

1 MR WERNER:

2 Q. Now, Mr Witness, before you said that these arms and
3 ammunition were taken to Sierra Leone by these RUF. How do you
4 know that?

10:00:34 5 A. Tell him that the people who used to come and collect the
6 arms and ammunitions are RUF people and those people cannot take
7 their supply to NPFL soldiers because at that time in Lofa there
8 was no fighting, so who are they going to give the supply except
9 taking it to Sierra Leone?

10:01:17 10 Q. Thank you, Mr Witness. Now, again, how long did you stay
11 in this TDY assignment in Zorzor with Mustapha Jallow?

12 A. Tell him on my that occasion I spent three months there.

13 Q. What, if anything, happened after that, Mr Witness?

14 A. After that I returned back to my assignment at Cobra Base.

10:01:57 15 Q. How long did you stay in this assignment at Cobra Base?

16 A. Tell him that upon my return in 1992, after my TDY in - 2
17 February. I was staying at Cobra Base. I had no TDY until 19 -
18 at the end of 1993.

19 Q. In 1993 what, if anything, happened in Lofa County?

10:02:52 20 A. Tell him that in - at around the end of 1993, I can say in
21 the month of December, I returned back there. This went up to
22 1994 then the TDY I went there for. At that time General
23 Mustapha Jallow was assigned for the operation because Charles
24 wanted to do an operation, but he doesn't want the international
10:03:35 25 community to know that he was the one doing the operation.

26 Q. Pause there. You said that Mustapha Jallow was assigned
27 for that operation, which operation are you talking about?

28 A. Tell him this was LDF operation.

29 Q. And what does LDF stand for, Mr Witness?

1 A. That is Lofa Defence Force.

2 Q. Just pause there. Then you said that Mustapha Jallow was
3 assigned for the operation because Charles wanted to do an
4 operation. Who is Charles?

10:04:31 5 A. I said Charles Taylor who is sitting down there.

6 Q. Now, Mr Witness, I do not think you answered my question
7 before you answer. I asked you: Before you went on any further
8 TDY, in 1993, if you know, what, if anything, happened in Lofa
9 County?

10:04:59 10 A. Tell him yes, ULIMO attack Lofa, ULIMO-K, Alhaji Kromah.

11 Q. Pause there, Mr Witness. What is ULIMO-K?

12 A. ULIMO-K is under Alhaji Kromah because there were two
13 ULIMOs: One was called ULIMO-J which was under the command of
14 Roosevelt Johnson, but this one is ULIMO-K which was under the
15 command of Alhaji Kromah.

10:05:50

16 Q. Just pause there, Mr Witness. I will come to the spelling
17 in one second, but just to clarify something before: You talked
18 about ULIMO-K, could you tell us what was the other faction you
19 spoke about?

10:06:14 20 A. That is ULIMO-J.

21 MR WERNER: So Roosevelt Johnson would be the normal
22 spelling and Alhaji Kromah, A-L-H-A-J-I, Kromah K-O-R-O-M-A:

23 Q. I asked you what was ULIMO and you explained that ULIMO-K
24 was under Alhaji Kromah and ULIMO-J was under Roosevelt Johnson,
25 but could you explain to the Court?

10:06:57

26 A. These were the same groups, but they had - the two leaders
27 had a problem, Alhaji Kromah and Roosevelt Johnson, then the
28 group became two.

29 Q. Pause, please, Mr Witness. When you said that ULIMO

1 attacked Lofa, what happened, if anything, when ULIMO attacked
2 Lofa?

3 A. When ULIMO attacked Lofa, at that time that was when
4 Mustapha was there.

10:07:59 5 Q. When was that?

6 A. If I can remember, this was around - at the end of 1992,
7 around the end of 1992, around the end of the year.

8 Q. You said that at the time ULIMO attacked Lofa, Mustapha was
9 there. Who are you talking about?

10:08:30 10 A. I am referring to Mustapha Jallow, General Mustapha Jallow,
11 under whose assignment I was at Lofa.

12 Q. And what, if anything, happened to General Mustapha Jallow
13 when ULIMO attacked Lofa at the end of 1992?

14 A. Tell him yes, Mustapha's supply line was disconnected
10:09:03 15 because he was taken from Zorzor and pushed him to Voinjama. He
16 was pushed from Voinjama, pushed to around Foya, to around
17 Kolahun.

18 Q. Pause there, Mr Witness. So, you said - when you say
19 Mustapha was disconnected, are you talking about Mustapha Jallow?

10:09:32 20 A. Yes, I am referring to Mustapha Jallow.

21 Q. You said that "he was taken from" and we could not
22 understand what you said. He was taken from where?

23 A. When he was taken from Zorzor he ran to Voinjama.

24 Q. Please, Mr Witness, what do you mean when you say he was
10:09:56 25 taken from Zorzor? What do you mean?

26 A. I said during that war they attacked Zorzor and there was
27 fighting there, so he moved from there and went to Voinjama.

28 Q. Who attacked Zorzor?

29 A. That ULIMO-K. ULIMO, Alhaji Kromah.

1 Q. Thank you. Then what happened, if anything, when he moved
2 to Voinjama?

3 A. Tell him that he was attacked at Voinjama, this ULIMO-K.
4 He was driven out of that to Foya. He was pushed out of Voinjama
10:10:50 5 to Foya and that was the time his supply line was cut off between
6 him and Gbarnga.

7 Q. When you say that he was driven off to Foya who are you
8 talking about?

9 A. I am referring to Mustapha. He moved from Voinjama and
10:11:16 10 went to Foya and he was going towards Kolahun.

11 MR WERNER: Just pause, Mr Witness. Kolahun, your Honours,
12 is K-O-L-A-H-U-N:

13 Q. You said that his supply line was cut off between him and
14 Gbarnga, which supply line are you talking about?

10:11:51 15 A. Tell him that at that time he has no access to come to
16 Gbarnga because it is the same route that they use, which was
17 occupied.

18 Q. When you say he had no access to come to Gbarnga, who are
19 you talking about?

10:12:11 20 A. I am referring to Mustapha Jallow.

21 Q. You said that he was driven off to Foya. What, if
22 anything, happened when he was driven off to Foya?

23 A. Tell him at that time an NPFL soldier was assigned around
24 that area who is a young soldier, Tamba, commonly known as
10:12:55 25 Jungle. He was the commander of that area, but he is a junior
26 commander, not a special force member.

27 Q. Pause there, Mr Witness. Jungle would be the name. Then
28 you said that he was the commander, Jungle was the commander of
29 that area, which area are you talking about?

1 A. Foya District. Foya is a district. This goes to around
2 Kolahun. Around that district he was their commander.

3 Q. I asked you what, if anything, happened to Mustapha Jallow
4 when he was pushed to Foya, so what happened to him, to Mustapha
10:13:50 5 Jallow?

6 A. Tell him that Mustapha and Tamba did not cope because at
7 that time Tamba has a grudge against Mustapha, until he wanted to
8 kill Mustapha.

9 MR WERNER: Pause there. I just noted that I didn't spell
10:14:19 10 Tamba which would be T-A-M-B-A:

11 Q. What do you mean when you said that Mustapha and Tamba did
12 not cope because at that time Tamba has a grudge against
13 Mustapha? What do you mean when you say that?

14 A. Tell him these junior commanders, commanders, some time had
10:14:48 15 a grudge with the special forces.

16 Q. Pause there, Mr Witness. When you said the junior
17 commanders, what do you mean?

18 A. This I told you earlier, those of us who came from Libya,
19 who came with Charles Taylor from Libya to Liberia, those are the
10:15:15 20 ones referred to as special forces. The ones we met at Liberia,
21 the young soldiers we recruited in Liberia were called junior
22 commandos.

23 MR MUNYARD: Can we be clear, looking at the transcript,
24 are we talking about junior commandos? It has come out as junior
10:15:47 25 commanders in the transcript. I am sorry to interrupt my learned
26 friend, but it is important to get the names right.

27 MR WERNER:

28 Q. Mr Witness, did you you say junior commanders, or did you
29 say junior commandos?

1 A. Junior commandos. It was because they were many you can
2 not say junior commando, you always say junior commandos with an
3 "s" which means it was plural.

10:16:29 4 JUDGE SEBUTINDE: Mr Werner, I also don't understand where
5 the witness said the junior commandos had a grudge with the
6 special forces, or something.

7 MR WERNER: I will come back to that:

8 Q. So you you said that the junior commandos had a grudge
9 against the special forces.

10:16:47 10 JUDGE SEBUTINDE: With, with.

11 MR WERNER:

12 Q. With the special forces. What did you mean when you said
13 that?

14 A. Tell him because Mustapha was fought against and he moved
10:17:06 15 from his position, this one thought that because Mustapha has now
16 reached his own area Mustapha was not going to take his command
17 and Mustapha also thought that he shouldn't take command from a
18 younger one, a junior soldier. So, that was the problem that
19 erupted between them because he always thought that he was within
10:17:48 20 his own control area, so that was not Mustapha's own control
21 area, so Mustapha was supposed to take command from him.

22 Q. We will come back to that, but my question was not about
23 Mustapha Jallow and Tamba Jungle, the question was: You said
24 that the junior commandos had a grudge with the special forces;
10:18:14 25 when you said that, what did you mean?

26 A. That is what I have said. I said - I don't know if you
27 didn't understand what I said, but even that man who is sitting
28 over there, he knows that, Mr Charles Taylor. At the time the
29 junior commandos had their ranks, those of us who were the

1 special forces were above them and there were some amongst us who
2 had higher ranks, but because those of us who were special forces
3 were the elite forces we were not supposed to take any command
4 from the junior commandos, so this was the grudge that erupted.

10:19:21 5 Q. Thank you, Mr Witness. Now, you explained that Mustapha
6 reached his own area and Mustapha was not going to take his
7 command. So, first, are you talking about Mustapha Jallow?

8 A. Yes, I am referring to Mustapha Jallow.

9 Q. And what do you mean when you say that Mustapha reached his
10:19:51 10 own area and Mustapha was not going to take his command? What
11 did you mean?

12 A. I said since Mustapha has reached his command area, Faya
13 Tamba, so he thought Mustapha supposed to take his commands.
14 I mean Faya Tamba.

10:20:27 15 Q. So what, if anything, happened at that time between
16 Mustapha Jallow and - sorry, Mr Witness, first about that: Now
17 you say "I mean Faya Tamba", who is Faya Tamba?

18 A. Faya Tamba commonly known as Jungle. He is an NPFL soldier
19 who was fighting under NPFL.

10:21:02 20 Q. When you say Faya Tamba, was Faya his first name?

21 A. Yes, his first name is Faya.

22 MR WERNER: And Faya would be F-A-Y-A, Tamba:

23 Q. So, Mr Witness, what, if anything, happened between Faya
24 Tamba, also known as Jungle, and Mustapha Jallow at Foya at that
10:21:44 25 time?

26 A. Tell him that this was the grudge between Mustapha and Faya
27 until we heard from the radio, from ULIMO, that Mustapha was
28 ambushed and killed, but that was not true. Then we, the
29 Gambians who were at Gbarnga at that time, was a concern -

1 Mustapha's affairs was a concern to us.

2 Q. Just pause there. You said that you heard from the radio,
3 from ULIMO, that Mustapha was ambushed and killed. How did you
4 learn anything from ULIMO?

10:22:59 5 A. Tell him they said it over Focus on Africa which we were
6 listening.

7 Q. Who said that?

8 A. ULIMO spokesman say it over Focus on Africa.

9 Q. Said what?

10:23:22 10 A. He said Mustapha Jallow was ambushed and killed.

11 Q. You said Focus on Africa. What is Focus on Africa,
12 Mr Witness?

13 A. Tell him it is a BBC programme that they used to do at
14 5 o'clock.

10:23:53 15 Q. Now, what, if anything, happened when you learnt on the BBC
16 that Mustapha Jallow had been killed?

17 A. I said these had been we, the Gambians', concern until we
18 had to gather together to have a meeting and inform Jackson who
19 was Charles Taylor's spokesman.

10:24:37 20 THE INTERPRETER: Sorry, your Honours, not spokesman. It
21 was Charles Taylor's aide-de-camp.

22 MR WERNER: Please wait. I believe the last word was
23 aide-de-camp:

24 Q. When you said that you had a meeting and informed Jackson,
10:25:10 25 was it the same Jackson you told us about on Friday, General
26 Jackson?

27 A. Yes, I am referring to the same Jackson, commonly known as
28 Jokuday Nyassi, a Gambian.

29 MR WERNER: We had the spelling already:

1 Q. So what, if anything, happened, Mr Witness, when you
2 gathered and had a meeting and informed Jackson?

3 A. Jackson informed Charles Taylor. When he informed
4 Charles - when he inform him, when he inform Charles Taylor then
10:26:06 5 Jackson told us that Charles Taylor said that he communicated
6 with RUF soldiers in Sierra Leone, so that they can give
7 reinforcement to Mustapha to come to Gbarnga.

8 Q. And what, if anything, happened after that, Mr Witness?

9 A. After that RUF soldiers who first came to give Mustapha
10:26:52 10 reinforcement to come to Gbarnga, to open the road for him to
11 Gbarnga.

12 Q. How did you know that RUF soldiers came to give Mustapha
13 reinforcement to come to Gbarnga?

14 A. Tell him that when the day that communication was done,
10:27:25 15 when Jackson was doing the communication, we went to Gbarnga. He
16 also responded that the old man told him that he has informed the
17 RUF soldiers to give reinforcement to Mustapha Jallow to come to
18 Gbarnga.

19 PRESIDING JUDGE: Mr Werner, I am a little confused.

10:28:02 20 I understood this meeting followed the death of Mustapha Jallow
21 and we are now having Mustapha Jallow reinforced.

22 MR WERNER: Your Honour, I believe that he said the alleged
23 death, but I will try to --

24 PRESIDING JUDGE: You say the alleged death, we are still
10:28:17 25 not clear if it is alleged or actual.

26 MR WERNER:

27 Q. Mr Witness --

28 THE WITNESS: I said that was not true, he was not dead.
29 Mustapha was not killed.

1 PRESIDING JUDGE: Now I understand. We could have had that
2 a little earlier.

3 MR WERNER:

10:28:45

4 Q. Now, Mr Witness, you said that RUF soldiers came to give
5 Mustapha reinforcement. If you know, who came to give Mustapha
6 reinforcement?

7 A. Tell him that the first person who came was the commander
8 of RUF. He is called General Pa Jean. He was the one who led
9 the RUF soldiers to reinforce Mustapha Jallow to Gbarnga.

10:29:21

10 MR WERNER: Your Honours, Pa Jean would be J-E-A-N.

11 JUDGE SEBUTINDE: Mr Werner, that was Pa Jean not Jean. Is
12 that P-A as a different word?

13 MR WERNER: Yes, Pa, sorry, P-A, and Jean would be J-E-A-N:

10:30:01

14 Q. Mr Witness, what, if anything, happened when Pa Jean led
15 RUF soldiers to reinforce Mustapha Jallow?

16 A. Tell him that when Pa Jean led these soldiers to reinforce
17 Mustapha they came by the - they came by the bush to Gbarnga, but
18 on their way Pa Jean died, but when they were reaching Waterside,
19 between Bong County and Lofa, at that time Morris Kallon, Morris
20 Kallon was in charge of RUF soldiers, but I will let you - I will
21 clear one thing to you.

10:31:01

22 Q. Just pause there, Mr Witness. Let me ask you a question
23 before that. You said that these soldiers who came to reinforce,
24 they came by the bush to Gbarnga?

10:31:32

25 JUDGE SEBUTINDE: I think we have bus.

26 A. Gbarnga.

27 MR WERNER:

28 Q. How did they come to Gbarnga?

29 A. Tell him Lofa had a big forest so they used the bush path.

1 They did not use the highway. They used the bush road. Then
2 when they entered through the forest they came to Belle Forest
3 area.

10:32:08 4 Q. Pause there, Mr Witness. I heard that and it was not
5 interpreted, but I heard you talked about Kumba?

6 A. Forest.

7 Q. What did you say about Kumba forest?

8 A. I said Mustapha came by the bush path, according to what he
9 explained to us. He said that he came through Kumba forest. It
10:32:44 10 is a thick forest. He came through that forest going through
11 Belle Forest, going through St Paul Waterside which was the
12 border between Gbarnga and Lofa. On his way he came, he came
13 with a lot of civilians which number was more than 2,000.

14 MR WERNER: [Microphone not activated] could I ask the
10:33:20 15 witness to be given exhibit P-26 which is the map of Liberia.
16 Maybe that could help. While that is done I will try to spell,
17 so Kumba Forest will be K-U-M-B-A Forest and Belle Forest will be
18 B-E-L-L-E. Earlier the witness spoke about Bong County which
19 will be B-O-N-G and I believe that he gave the name - St Paul
10:34:01 20 would be the correct spelling:

21 Q. Please, Mr Witness, can you indicate the route taken from
22 Foya by the RUF and Mustapha Jallow to Gbarnga?

23 A. Give me some minutes. If you look at the map, when you
24 look at the map you will see Kolahun on the map. From Kolahun
10:35:18 25 tell him that this - the forest on the map were not marked.

26 I don't see the name of Kumba Forest, but I saw a village whose
27 name is Belle Yella. Have you seen that on the map? From
28 Kolahun he went through that bush path going to around Belle
29 where you have Belle Forest. From Belle Forest I don't know

1 whether you can see - you can see the mark of St Paul River under
2 Belle Yella. This is the water's way. Between these two you
3 have the border of Bong County and Lofa. There was a bridge
4 which you cross to enter and go to Gorlu, going to Zorzor, going
10:36:48 5 to Voinjama. From this border between Bong County and Lofa, at
6 the border there was a bridge. At that bridge the water was
7 called St Paul, or St John River. This was where they came to.

8 Q. And then where did they go?

9 A. Tell him that when they reached at this waterside, that was
10:37:42 10 the time Mustapha reported to Gbarnga and RUF's commander,
11 commonly called Morris Kallon.

12 MR WERNER: Now, some names were spelt. Belle Yella would
13 be B-E-L-L-E and then the second word Yella, Y-E-L-L-A. Another
14 name was indicated by the witness on the map, Gorlu, which should
10:38:28 15 be G-O-R-L-U.

16 JUDGE SEBUTINDE: Mr Werner, did the witness say that
17 Mustapha reported to Morris Kallon? Is that what he said?

18 MR WERNER: I will clarify, your Honour.

19 THE WITNESS: Tell him that --

10:39:00 20 MR WERNER:

21 Q. Did you say that Mustapha reported to Morris Kallon?

22 A. No, I said when they reach at St Paul Waterside, between
23 the border of Bong County and Lofa, with soldiers and civilians,
24 that was the time Mustapha and Morris Kallon came to Gbarnga to
10:39:24 25 report at the Mansion Ground of Charles Taylor.

26 Q. You spoke about Morris Kallon. Again, who was Morris
27 Kallon?

28 A. Morris Kallon - tell him when Pa Jean died in the bush this
29 Morris Kallon took the command of RUF soldiers called Gbarnga.

1 He took the command.

2 Q. When you said that Morris Kallon took the command of RUF
3 soldiers called Gbarnga, what did you mean?

10:40:23

4 A. Pa Jean, General Pa Jean was the one who led them from
5 Sierra Leone to come to Mustapha, but on their way Pa Jean died
6 on the road, on the way. Pa Jean died on the way if you could
7 remember. When Pa Jean died then Morris Kallon took over the
8 command, the commander of RUF soldiers.

10:40:56

9 Q. Thank you, Mr Witness. Now, you said that they reached at
10 St Paul Waterside, on the border of Bong County and Lofa County,
11 with soldiers and civilians. Who were these civilians,
12 Mr Witness?

13 A. Tell him the civilians, among them there were children,
14 women and men. Lofa civilians.

10:41:17

15 Q. Why did they travel with the RUF, if you know?

16 A. Tell him that these were the people - when they attacked
17 Zorzor and Voinjama, the civilians who fled went with Mustapha.
18 It is the same civilians.

19 Q. Now, what, if anything, happened after that?

10:41:51

20 A. Tell him that when Mustapha reported at Gbarnga
21 Charles Taylor told him to go and rest for a while, so while he
22 was resting Charles Taylor made an initiation to attack ULIMO
23 because at that time they had a discussion - I don't know whether
24 Ghana - for the ceasefire.

10:42:31

25 Q. Who had a discussion at that time for the ceasefire?

26 A. Tell him Charles Taylor and Alhaji Kromah, the warring
27 factions, had a meeting. I forgot the country, whether Ghana or
28 Mali.

29 JUDGE SEBUTINDE: Mr Werner, I don't understand. What is

1 an initiation to attack? Charles Taylor made an initiation to
2 attack ULIMO, what is that?

3 MR WERNER: I will try to clarify:

10:43:12

4 Q. Mr Witness, you appear to have said that Charles Taylor
5 made an initiation to attack ULIMO. What did you mean when you
6 said that?

10:43:53

7 A. This is what I am saying: After ULIMO had attacked, but he
8 must plan it because if he did not plan they will say he has
9 broken the agreement of ceasefire. This was the time he formed a
10 group called LDF.

11 Q. So you said after ULIMO had attacked "he must plan it", who
12 are you talking about?

13 A. Can you repeat your question? That is not clear to me
14 because I am not talking about ULIMO.

10:44:22

15 Q. The answer you gave, Mr Witness, as it appears on the
16 screen was that "After ULIMO had attacked he must plan it because
17 if he did not plan they will say he has broken the agreement of
18 ceasefire." Who are you talking about?

10:44:58

19 A. I said ULIMO-K were responsible for Lofa and during their
20 discussion they had a ceasefire agreement, the discussion between
21 Charles Taylor and Alhaji Kromah, but Charles Taylor did not want
22 Lofa to be under the responsibility of ULIMO. I said that was
23 the time he decided to form a group that will attack ULIMO so
24 that his name would not be mentioned. This was the time he
25 formed LDF. Charles Taylor formed LDF.

10:45:36

26 Q. What happened when Charles Taylor formed LDF?

27 JUDGE SEBUTINDE: Do we know what LDF is, or stands for?

28 MR WERNER: He said that, your Honour, Lofa Defence Force:

29 Q. So, Mr Witness, what happened when Charles Taylor formed

1 the LDF?

2 A. When he formed LDF he made --

3 THE INTERPRETER: Your Honours, could the witness be asked
4 to repeat the name of the man he has --

10:46:31 5 MR WERNER:

6 Q. Mr Witness, pause just a moment.

7 THE INTERPRETER: And speak slowly.

8 MR WERNER:

9 Q. Could you repeat your answer, Mr Witness?

10:46:49 10 A. Tell him that when he formed LDF he selected one man called
11 Yakbawalo to be the political leader of LDF, the spokesman who
12 speaks on behalf of LDF over the radio. Mustapha Jallow was the
13 military leader to be responsible for the operation.

14 Q. Pause there. Can you repeat the name of the political
10:47:40 15 leader of the LDF appointed by Charles Taylor?

16 A. His name is Yakbawalo. It is a normal name.

17 MR WERNER: Your Honours, Yakbawalo would be
18 Y-A-K-B-A-W-A-L-O:

19 Q. What happened, Mr Witness, after LDF was formed?

10:48:19 20 A. That was the time Mustapha gathered his NPFL soldiers
21 together and Morris Kallon, who came with RUF soldiers that are
22 called vanguards.

23 Q. When you said that Morris Kallon came with RUF soldiers
24 that are called vanguards, what do you mean when you said
10:49:06 25 vanguards?

26 A. Vanguards, any soldier who was under RUF from Sierra Leone
27 who were in the NPFL territory were referred to as vanguards.
28 That is the name they are referred to.

29 Q. And what, if anything, happened when Mustapha gathered his

1 soldiers and Morris Kallon came with the vanguards?

2 A. These two groups came, joined together, NPFL and the
3 vanguard group joined together with the RUF soldiers who were
4 called - who were known as Lofa Defence Force. This was the time
10:50:22 5 Lofa started the attack. LDF started attacking ULIMO-K.

6 Q. Thank you, Mr Witness. You said that NPFL and the
7 vanguards joined together with RUF soldiers and then you said
8 they were called Lofa Defence Force. What did you mean when you
9 said that?

10:50:51 10 A. Tell him that I said Morris Kallon and the RUF who - Morris
11 Kallon who came with the RUF soldiers, who were referred to as
12 vanguards, were joined with the Mustapha soldiers, the NPFL.
13 These two groups were named LDF, Lofa Defence Force.

14 Q. Again, Mr Witness, if you can tell us again at that time
10:51:34 15 then who was the military leader, if anybody, of the LDF?

16 A. Mustapha Jallow was the military leader.

17 Q. How many fighters did the LDF have at that time?

18 A. I cannot know the number because LDF battalions were too
19 many.

10:52:15 20 Q. And then, if anything, what happened after LDF was formed?

21 A. I said that was the time LDF started attacking in Lofa.

22 Q. Who did the attack?

23 A. LDF soldiers who were led by Mustapha.

24 Q. You said they started attacking, where did they start
10:52:55 25 attacking?

26 A. When they reached Waterside that - from Waterside going to
27 a village before you reach Vona [phon]. Then that area was under
28 the command of NPFL soldiers. NPFL attack started in Gorlu going
29 to Zorzor.

1 Q. So you said that NPFL attacked Gorlu and Zorzor. Who
2 were - when they attacked who were - if anybody, who were at
3 Gorlu and Zorzor at that time?

4 A. At that time ULIMO-K was responsible of Gorlu.

10:54:08 5 Q. And what, if anything, happened after these attacks?

6 MR MUNYARD: Sorry, he has only answered half of the
7 question. Mr Werner asked him about Gorlu and Zorzor.

8 MR WERNER: I will clarify that:

9 Q. You explained that NPFL attacked ULIMO at Gorlu. What, if
10:54:35 10 anything, happened in Zorzor?

11 A. Tell him, yes, NPFL, Lofa Defence Force driven out ULIMO-K
12 from Zulu [phon] - from Gorlu.

13 THE INTERPRETER: Your Honours, could the witness repeat
14 that area please?

10:55:09 15 MR WERNER:

16 Q. Mr Witness, can you repeat the last part of your answer?
17 You said that "Lofa Defence Force driven out ULIMO-K from Gorlu",
18 so let us go over that again. What happened at Gorlu,
19 Mr Witness?

10:55:34 20 A. I said that LDF, when they attacked ULIMO-K at Gorlu they
21 had driven out ULIMO-K from Gorlu and they went to a village
22 called Salaye. This is also a big village.

23 MR WERNER: Salaye, S-A-L-A-Y-E:

24 Q. What happened?

10:56:16 25 JUDGE LUSSICK: I am sorry to interrupt, but I am having
26 difficulty following this because your original question was
27 what, if anything, happened in Zorzor and since then we have been
28 dealing solely with Gorlu.

29 MR WERNER: Yes, exactly:

1 Q. Mr Witness, my question was about Zorzor. I think we
2 understand what happened at Gorlu. What, if anything, happened
3 in Zorzor?

4 A. I said the first attack - when ULIMO was occupying up to
10:56:56 5 Gorlu then Zorzor were all occupied by ULIMO, so LDF start
6 fighting Gorlu going towards Zorzor. The first village that they
7 occupied was Gorlu. This was the time they drove ULIMO-K up to
8 Salaye, but later they occupied Salaye also from ULIMO-K. They
9 keep on pushing them up to Zorzor.

10:57:56 10 Q. When you said "they keep on pushing them up to Zorzor", who
11 are you talking about?

12 A. LDF was pushing ULIMO-K.

13 Q. What, if anything, happened when they pushed ULIMO to
14 Zorzor?

10:58:26 15 A. Tell him they had been fighting for a long time before they
16 occupied Zorzor. This was the time I had my third assignment
17 under the LDF. When I was joining them, at that time Gorlu was
18 our CP.

19 Q. You said that they were fighting for a long time before
10:59:03 20 they occupied Zorzor and that was the time you had your third
21 assignment. When did that happen?

22 A. This was in 1994.

23 Q. Who, if anyone, gave you that assignment?

24 A. Tell him that I was under SSS. My assignment - if I am to
10:59:38 25 be taken for an assignment the paper must come from SSS. They
26 gave the letter to Mustapha because Mustapha told them that he
27 needs somebody to join him because I was somebody that Mustapha
28 trusted, so most of the time when he is asked who he want to join
29 him he used to tell them I.

1 Q. When you talked about Mustapha, who are you talking about?

2 A. Mustapha Jallow, LDF commander.

3 Q. Mr Witness, I understand that it is a bit painstaking, but
4 it would help us when you refer to Mustapha if you can say his

11:00:34 5 full name. That will be helpful. Now, you said that at the time
6 that you went for this assignment, when you joined, Gorlu at that
7 time was your - and we can not read what you said. What was
8 Gorlu at the time that you joined Mustapha Jallow for this
9 assignment?

11:01:03 10 A. Tell him that that was our CP, command post.

11 Q. How long did you remain in Lofa County fighting alongside
12 Mustapha Jallow?

13 A. Tell him that I spent a long time because I spent almost
14 seven to eight months there until we were pushed by ULIMO.

11:01:41 15 Q. Pause there. During that time, during this seven to eight
16 months you spent in this assignment in Lofa County, did you have
17 a rank?

18 A. Yes, tell him yes. When I was going there for the first
19 time I had the rank of lieutenant colonel, but during my
20 attachment there, by the time I had four months Mustapha came
21 from Gbarnga and told me that I was promoted to a colonel.

22 Q. Which year was that?

23 A. This was in 1994.

24 Q. Then you said that you spent seven to eight months in Lofa
25 County until you were pushed by ULIMO. What did you mean?

11:02:48 26 A. Tell him we were pushed by ULIMO. We went up to Bong
27 County.

28 Q. Mr Witness, I just want to go back to one thing you said.
29 You talk about a letter given to you at the time that they told

1 you about your assignment in Lofa. What was this letter?

2 A. Tell him that when they are sending you for TDY assignment,
3 because I was going to under Mustapha Jallow, he came - he came
4 with the letter from the office of SSS, then the Gbatala. He
11:04:03 5 came to our base and told me that I am now - I am now under him
6 for the TDY assignment because at that time he was given the
7 operation commander, the operation as military commander.

8 Q. My question was about - you spoke about a letter, so were
9 you given a letter?

11:04:40 10 A. No, I said Mustapha came with the letter to the base.
11 I was not given the letter. Mustapha came with the letter at the
12 base and explained it to me. Normally when those type of letters
13 came it is not that they used to give you the letter personally,
14 but under whose command you are at the administration, they used
11:05:26 15 to take the letter to that administration. It is the
16 administration that call and inform you that you are given
17 assignment so and so, you are supposed to go for that.

18 Q. Did you see this letter?

19 A. Yes, I read the letter personally.

11:05:50 20 Q. Who wrote that letter?

21 A. Tell him the undersigned signature on the letter was
22 General Yeaten.

23 Q. Now, Mr Witness, what was the situation in Lofa County at
24 the end of your assignment?

11:06:32 25 A. Tell him that at that time Lofa's condition was there was a
26 lot of fighting in Lofa at that time between LDF and ULIMO-K.

27 Q. You spoke before about Zorzor. Who, if anyone, was in
28 charge of Zorzor at the end of your assignment?

29 A. I don't understand. Can you clarify that?

1 Q. You spoke before about different locations in Lofa County
2 and you spoke about Zorzor; which group, if any, was in Zorzor at
3 the end of your seven/eight months of your assignment?

4 A. Tell him that the time I finished my assignment at Lofa,
11:07:47 5 when ULIMO pushed us up to the border of Lofa and Bong, at that
6 time ULIMO-K occupied Zorzor.

7 Q. And you told us before about a place called Belle Yella, do
8 you remember?

9 A. Tell him yes, I can remember that.

11:08:20 10 Q. At the end of your assignment, if you know, what was the
11 situation at Belle Yella?

12 A. Tell him that Belle Yella was under Lofa. It is part of
13 Lofa County, but that area, at that time, in the Belle Forest
14 there was another commander whose command was different from
11:08:53 15 ours. He was under NPFL because at that time we were referred to
16 as LDF, but that commander his name is Mon Ami.

17 MR WERNER: Your Honour, Mon Ami is a French name, M-O-N
18 A-M-I:

19 Q. Now, Mr Witness, at that time, at the end of your
11:09:29 20 seven/eight month assignment in Lofa County, what access, if any,
21 were there between NPFL in Liberia and RUF in Sierra Leone at the
22 end of your assignment?

23 A. Tell him that where we were fighting there was no access by
24 vehicle. There was no access. If there was to be access it has
11:10:12 25 to be by foot.

26 Q. So was there access by foot?

27 A. Tell him Liberia has a lot of - a lot more footpaths than
28 vehicle. There was a footpath from there to Belle Yella Forest.

29 Q. Pause there. You said, "There was a footpath from there to

1 Belle Yella Forest", from where?

2 A. Tell him I said a footpath - there are more footpaths in
3 Liberia. There are more footpaths than paths that vehicles can
4 use. Anywhere you want to go through Liberia you can use a
11:11:22 5 footpath. Even where we were at that time we had a footpath
6 which we used up to Mon Ami and that is a long way to go. You
7 can also use a footpath from Belle Yella to Bopolu, to Bopolu.

8 JUDGE SEBUTINDE: Mr Werner, is Mon Ami a name of a place,
9 or a person?

11:11:57 10 MR WERNER: I will clarify that, your Honour:

11 Q. Tell us again, Mr Witness, who or what was Mon Ami?

12 A. Tell him Mon Ami is an NPFL commander.

13 Q. Mr Witness, was Mon Ami an NPFL commander, is that correct?

14 A. Yes, tell him he was a soldier of NPFL. He was the one in
11:12:37 15 the forest at that time.

16 MR WERNER: Your Honour, I will try to clarify that, but a
17 name was given, which is Bopolu, and it will be B-O-P-O-L-U:

18 Q. So, Mr Witness, you said that there was a bush path from
19 Gbarnga to Belle Yella. Now --

11:13:06 20 A. Tell him that I said there was a footpath between us to Mon
21 Ami you can use - which you can use from Gorlu to Belle Yella,
22 the footpath, if you are leaving Gbarnga. If you come from
23 Gbarnga there was a road for vehicles from Gbarnga going to Belle
24 Yella, but that - the road for vehicles stops at Belle. It
11:13:40 25 doesn't continue. You can go from Gbarnga - if you come from
26 Gbarnga going to around Monrovia, about 6 to 10 kilometres, there
27 was a village called Phoebe. There is a hospital at that
28 village. That Phoebe has a junction that can be used by vehicles
29 going directly to Belle Yella, up to Belle Forest, but that is

1 where the path for vehicles stop.

2 MR WERNER: Mr Witness, pause there one moment. Can I ask
3 the witness to be given again P-26:

4 Q. Mr Witness, just pause one second.

11:14:55 5 A. I am referring --

6 Q. Pause one second. You said that there was a road going
7 from Gbarnga to Belle Yella, a road which can be used by cars.
8 Now, at the end of your assignment, the seven/eight months
9 assignment with the LDF in Lofa County, was it possible to use

11:15:19 10 that road by car from Gbarnga to Belle Yella?

11 A. Yes, you can use - you can take a vehicle and go up to
12 there, but then ULIMO did not occupy that forest.

13 Q. Which forest are you talking about from Gbarnga to Belle
14 Yella, which forest are you talking about?

11:15:49 15 A. That is the forest referred to as Belle Forest.

16 Q. Now, from Belle Yella where you said that Mon Ami had his
17 assignment at that time, he was an NPFL commander, from Belle
18 Yella what access, if any, was there to the Sierra Leonean
19 border?

11:16:20 20 A. Tell him yes, there was a road, a road used by vehicles.

21 If you look at the map, if you come from Gbarnga, coming towards
22 Gbatala, when you come from Gbarnga about 6 to 8 kilometres, or
23 10 kilometres, there is a village called Phoebe.

24 Q. Do you know how to spell Phoebe?

11:17:07 25 A. Phoebe, okay. If I could remember, it is spelt

26 P-H-O-E-B-E. I think that is the spelling. There was a hospital
27 in that village. If you reach that village there is a road used
28 by vehicles going to Belle. This was the - this was Mon Ami's
29 CP, his command post.

1 Q. You said that there was a road from Belle Yella, at that
2 time, from Belle Yella to the Sierra Leonean border. Was it
3 possible to use that road at that time?

4 A. I said no vehicle can use - the road for vehicles stop at
11:18:24 5 Belle if anyone want to use that road, unless you use the
6 footpath.

7 Q. Footpath from Belle Yella to the Sierra Leonean border?

8 A. Tell him that is many. Liberia has more footpaths than
9 paths for vehicles.

11:18:54 10 Q. Thank you, Mr Witness. Now, at that time, at the end of
11 your seven/eight months assignment with the LDF in Lofa County,
12 who, if anyone, travelled on these roads from Gbarnga to the
13 Sierra Leonean border?

14 A. I don't hear you clearly.

11:19:34 15 Q. You told us that there was a car road from Gbarnga to Belle
16 Yella and then you testified that there was a bush path from
17 Belle Yella to the Sierra Leone border and my question is: As
18 far as you know, at that time, at the end of your assignment,
19 who, if anyone, travelled on those roads from Gbarnga to the
11:19:56 20 Sierra Leone border?

21 MR MUNYARD: With respect, the question is still unclear.
22 My learned friend is referring to bush paths and roads. The
23 witness has given his answer, or has asked for an explanation,
24 and Mr Werner has gone back to using the word "roads". Is he
11:20:16 25 talking about car roads, or is he talking about footpaths, or is
26 he talking about both?

27 MR WERNER: I will break it down:

28 Q. Mr Witness, you testified that there was a car road from
29 Gbarnga to Belle Yella. At that time, at the end of your

1 assignment, who, if anyone, travelled on that car road from
2 Gbarnga to Belle Yella?

3 A. Yes, there was a car road. When Mon Ami is coming to
4 Gbarnga he used a vehicle from Belle Yella to Gbarnga by vehicle.

11:20:54 5 Q. And who else, if anybody, was using that car road from
6 Gbarnga to Belle Yella?

7 A. Tell him that road was used by NPFL soldiers because then
8 there were no civilians in Belle Forest. Anyone you see going
9 there was NPFL soldiers.

11:21:30 10 Q. Then you testified that there was bush path from Belle
11 Yella to the Sierra Leone border. Who, if anyone, used those
12 bush paths at that time?

13 A. Tell him these footpaths that I am telling were being used
14 only by NPFL soldiers. I said they were used by only NPFL
11:21:59 15 soldiers. No civilian used that footpath.

16 Q. Thank you, Mr Witness. Now, why did these NPFL soldiers,
17 at that time, use this bush path from Belle Yella to the Sierra
18 Leonean border?

19 A. Tell him that NPFL used that footpath to go to Sierra Leone
11:22:33 20 border because we ourselves - most of the time when we are
21 sending supplies to people, or going to people, we used to take
22 them by foot because at that time we used to supply through
23 footpaths. We do the men reinforcement power by using the
24 footpath because of the difficulties of having vehicles.

11:23:13 25 Q. When you said that "we are sending supplies to people",
26 which people are you talking about?

27 A. Tell him the supply always - I am always referring to arms
28 and ammunitions.

29 Q. My question was: You said that you were sending supplies

1 to people from Belle Yella, which people are you talking about?

2 A. I don't say I personally used to supply people. I said
3 NPFL at some places which cannot be accessed by motor vehicles,
4 instead by footpath most of the time. Most of those places, how
11:24:24 5 does NPFL supply those places was by using the footpath.

6 Q. When you said that NPFL supplied those places, where were
7 those places at that time that NPFL supplied?

8 A. Tell him many - there are many places in Liberia that are
9 accessed by footpath. You cannot access those places by vehicle
11:25:04 10 because you can go by Belle up to Bopolu by foot. You can go
11 from Belle and go up to Lofa Bridge on foot. It is a long
12 distance, but people use on foot.

13 Q. Thank you, Mr Witness. Now, so you explained that at the
14 end of your TDY, of your assignment, the LDF was pushed. Now,
11:25:45 15 where was Mustapha Jallow at that time, at the end of your
16 seven/eight month assignment?

17 A. Tell him I was together with Mustapha at that time. We
18 were the ones they pushed from Lofa to Bong County. I was
19 together with him.

11:26:13 20 Q. What happened to you after you were pushed?

21 A. Tell him when we reached Waterside, the border between Lofa
22 and Bong County, ULIMO attacked us at Waterside again and pushed
23 us up to a village called Belle Fanai, a village between - a
24 village around Gbarnga.

11:26:54 25 Q. What was the name of the village again?

26 A. Belle Fanai. If you look at the map you will see the name.

27 Q. Are you able to help us with a spelling of that name?

28 A. I think Belle Fanai's name is on the map. Belle Fanai
29 anyway's name is not mentioned, but it is almost 10 or 12

1 kilometres away from Gbarnga. It is around this area when coming
2 from St Paul Waterside [indicated]. The name is not mentioned on
3 the map.

4 PRESIDING JUDGE: When we adjourn can we have some
11:28:13 5 spellings please? Belle Yella?

6 MR WERNER: Belle Yella I think was spelt before, B-E-L-L-E
7 Y-E-L-L-A. I am unable to help you with the last spellings:

8 Q. Mr Witness, are you able to spell that last location you
9 indicated on the map, Belle Fanai?

11:28:32 10 A. Tell him I will try and see, B-E-L-L-E F-A-N-A-I. Belle
11 Fanai.

12 PRESIDING JUDGE: I think that is an appropriate place to
13 adjourn for the mid-morning break, Mr Werner. Mr Witness, we
14 will now take a half hour mid-morning break and we will resume
11:29:21 15 the Court again at 11.30 [sic]. Please adjourn court.

16 [Break taken at 11.30 am.]

17 [Upon resuming at 12.00 p.m.]

18 PRESIDING JUDGE: I notice a change of appearance at the
19 Defence Bar.

12:00:10 20 MR MUNYARD: Madam President, that is correct.
21 Mr Courtenay Griffiths, Queen's Counsel, is now present, as
22 foreshadowed by me at the beginning of the session this morning.

23 PRESIDING JUDGE: Thank you. We welcome Mr Griffiths back.
24 Mr Werner, please proceed.

12:00:30 25 MR WERNER: Thank you, Madam President:

26 Q. Mr Witness, this morning you testified being in the first
27 TDY with Mustapha Jallow in Lofa in 1992 when there was no
28 fighting in Lofa County. Do you remember that?

29 A. Yes.

1 Q. You said that - you testified that at that time the RUF
2 took arms and ammunition from Gbarnga to Sierra Leone and that
3 that was their supply line. Do you remember that?

4 A. Tell him yes.

12:01:33 5 Q. Mr Witness, during what time period did the RUF take arms
6 and ammunition from Gbarnga to Sierra Leone through that supply
7 line?

8 A. Tell him this was early part of 1992.

9 Q. And what, if anything, happened to that supply line later?

12:02:01 10 A. At that time, when ULIMO occupied Lofa, they cut the supply
11 line.

12 Q. And, if you know, when did that happen?

13 A. Tell him I cannot give you the exact time, but it was
14 around the end of 1992 when ULIMO took control and cut the supply

12:02:38 15 line.

16 Q. Thank you for that clarification, Mr Witness. Now, this
17 morning you told us as well about an individual called Tamba Faya
18 Jungle. Do you remember?

19 A. Yes, I can remember that.

12:03:00 20 Q. And you explained to this Court that there was a grudge
21 between Jungle and Mustapha Jallow and then the RUF came from
22 Sierra Leone to escort Mustapha Jallow all the way to Gbarnga.
23 Do you remember that?

24 A. I can remember that.

12:03:19 25 Q. Now, Mr Witness, what if anything happened to Jungle, Tamba
26 Faya?

27 A. When Mustapha and RUF soldiers came to reinforce for a raid
28 to Gbarnga, ULIMO came to where Tamba was and pushed him. The
29 reason we heard about Tamba - the last information we heard about

1 Tamba was that he entered Sierra Leone and joined the RUF
2 soldiers to help them fighting. He did not return to Gbarnga.

3 Q. How did you learn about that, Mr Witness?

12:04:40

4 A. [Microphone not activated] who came, the soldiers, Tamba's
5 soldiers, who were there who joined Mustapha's people. There
6 were others who also followed Mustafa, the route they used. They
7 were the ones who gave us the information about Tamba because he
8 was afraid to come to Gbarnga, just that. They said Tamba said
9 he was afraid to come to Gbarnga because if he - if he comes
10 there they will give information about him to Charles Taylor.

12:05:21

11 There is a likelihood that he can be killed.

12 Q. Mr Witness, how long - if you know, how long did Jungle
13 stay with the RUF in Sierra Leone?

12:06:04

14 A. When Tamba entered Sierra Leone, I don't know anything
15 about his return to NPFL until I left there in 1996. I went to
16 do the negotiation in the Gambia.

12:06:28

17 JUDGE SEBUTINDE: Mr Werner, I don't know if you are
18 looking at the record from line 3 through to 16. To me it
19 doesn't make sense at all. Maybe you are satisfied, but it
20 doesn't make sense. This is due to the fact that microphones
21 were not activated, or whatever, but whatever this witness says
22 it doesn't make sense from line 3 onwards for the next ten lines.

23 MR WERNER: I will go over that again, your Honours:

12:07:01

24 Q. So, Mr Witness, you said that Tamba said that he was afraid
25 to come to Gbarnga and then if he comes they will give
26 information and that there was a likelihood that he can be
27 killed. So, what did Tamba do at that time?

28 A. Tell him that when he was pushed by ULIMO, when they pushed
29 Tamba he entered Sierra Leone and joined the RUF soldiers. He

1 was fighting alongside them.

2 Q. Mr Witness, how did you learn about that? Who told you
3 about that, if anyone?

4 A. Tell him that I said Tamba's soldiers, after when Mustapha
12:08:22 5 left, when ULIMO pushed Tamba, some of his soldiers who wanted to
6 use the footpath that was used --

7 THE INTERPRETER: Your Honours, could the witness be asked
8 to repeat the last bit of his statement?

9 PRESIDING JUDGE: Mr Interpreter, I don't know what it is
12:09:01 10 you are trying to say.

11 THE INTERPRETER: Your --

12 PRESIDING JUDGE: Just a minute, because your sentence is
13 not logical. I will ask the witness to repeat his answer and
14 please this time interpret it properly.

12:09:19 15 Mr Witness, the interpreter has asked if you would repeat
16 your answer. Do you wish to have the question again?

17 THE WITNESS: [Microphone not activated] said the question
18 you asked was the whereabouts of Tamba when Mustapha left. I
19 think that was the question you were asking.

12:09:50 20 MR WERNER:

21 Q. Yes, you answered that question. You answered that
22 question. My question was simply how did you learn about that
23 and if you can give a short answer that will be appreciated.
24 Just how did you learn about the fact that Jungle remained with
12:10:04 25 the RUF, fighting alongside the RUF? How did you learn about
26 that?

27 A. I said Jungle and the soldiers who were with him, under
28 him, some of them - some of them did not go with Jungle to Sierra
29 Leone. Some of those soldiers came by the footpath that was used

1 by Mustapha. That was the same footpath that they used to come
2 to Gbarnga. I heard from those soldiers that Jungle went to
3 Sierra Leone. He entered Sierra Leone. He has joined - he had
4 joined RUF soldiers and is fighting alongside them.

12:11:10 5 Q. Thank you, Mr Witness. Now, this morning you testified
6 about the LDF and you said that the RUF were with the NPFL in the
7 LDF. Do you remember that?

8 A. Yes, RUF people were in LDF.

9 Q. Thank you, Mr Witness. You said this morning that they
12:11:48 10 were fighting for seven to eight months during your assignment in
11 Lofa and you explained about that fight in detail. Do you
12 remember that?

13 A. Tell him I was fighting there six months to eight months.

14 Q. Now, Mr Witness, what did the RUF do as part of the LDF?

12:12:21 15 A. [Microphone not activated] soldiers, we were together and
16 we were fighting alongside against ULIMO forces.

17 Q. And when you say "we", who are you referring to?

18 A. I am referring to NPFL soldiers and RUF soldiers who joined
19 together to fight.

12:12:51 20 Q. Now, this morning you said, or you talked about an attack
21 on Gorlu and against Zorzor and you said that NPFL attacked Gorlu
22 and attacked Zorzor. So, what were the RUF doing while the NPFL
23 were attacking Gorlu and Zorzor?

24 A. Tell him that these RUF soldiers were LDF soldiers. NPFL
12:13:21 25 and RUF joined to form LDF. They are the same.

26 Q. Now to be completely clear, Mr Witness, these LDF - because
27 you talked this morning about a number of fightings and so these
28 LDF soldiers, what weapon did they use, if you know?

29 A. Tell him we were using AK-47, RPG, GMGs and there was

1 another light weapon called LAR.

2 Q. And do you know what LAR stands for?

3 A. LAR, light arm rifle.

12:14:50

4 Q. Thank you. Now, if you know, from what sources did the LDF
5 get the arms and ammunitions from?

6 A. Tell him the start of the war I told you LDF was a group
7 formed by Charles Taylor himself. We used to take our supplies
8 from Gbarnga. We have our arms and ammunitions from that place.

9 Q. Now, if you know, who was issuing the weapons in Gbarnga?

12:15:31

10 A. Tell him that we used to take the weapons from Charles
11 Taylor's Mansion Ground, from his armourer at his Mansion Ground.
12 If I do not forget the man's name, he is Moses.

13 Q. Thank you, Mr Witness. Now, you told us this morning that
14 the political leader of the LDF was a man called Yakbawalo. Now
15 what, if anything, did you hear Yakbawalo saying publicly about
16 the LDF?

12:16:19

17 A. Tell him, yes, I heard.

18 Q. What did you hear, Mr Witness?

12:16:55

19 A. Tell him that Yakbawalo has even spoke in BBC to say that
20 he is the leader of LDF because the Lofa people want their
21 freedom. That was why he led people from Lofa to fight against
22 ULIMO. He said this group is not the same as NPFL group. I
23 personally heard that from BBC. That interview, if I could
24 recall, was done in Guinea.

12:17:45

25 Q. And, Mr Witness, was that true that this group was not the
26 same as NPFL as you heard Yakbawalo saying on the BBC?

27 A. Tell him that was not true. That was just the coverage for
28 the international world.

29 Q. Now, when did you hear Yakbawalo on the BBC? Can you

1 remember the date?

2 A. Tell him it was in 1993. I cannot remember the month, but
3 it - he gave the speech in 1993.

12:18:46

4 Q. Now, Mr Witness, what, if anything - during this same time
5 period what, if anything, did you hear Charles Taylor saying
6 publicly about the LDF?

7 A. To talk about LDF, what?

12:19:14

8 Q. You told us that you heard Yakbawalo talking about the LDF
9 on BBC. My question was what, if anything, did you hear Charles
10 Taylor saying publicly about the LDF?

11 A. Yes, Charles Taylor himself was interviewed about LDF. He
12 said he doesn't know anything about LDF. He said Lofa people
13 form a group to secure - to protect their county. He has no hand
14 about LDF. That in Charles Taylor's speech when he was

12:19:57

15 interviewed.

16 Q. Just one moment. Now, Mr Witness, I am told that the
17 record is not clear about Moses and so I apologise for that, but
18 I will just come back and ask one question again about Moses.

12:20:25

19 You told us about Moses in Gbarnga. Now, who was Moses again in
20 Gbarnga, if you can remember?

21 A. Moses was - he was the armoury commander. He was the one
22 responsible for the armoury in Gbarnga. He was the one who used
23 to give the supply for arms and ammunition.

12:20:52

24 Q. Thank you, Mr Witness. Now, this morning you told us that
25 you and Mustapha Jallow, at the end of your assignment with the
26 LDF you retreated. Do you remember that?

27 A. Tell him I can remember that when ULIMO pushed us, this was
28 in Belle Fanai.

29 Q. We spelt that name already. What happened to the LDF

1 troops at that time, if anything?

2 A. That was the time Charles Taylor gave an order and said LDF
3 soldiers should withdraw from the front line. He said they
4 handed over themselves to him. What he said over the news, that
12:21:46 5 LDF soldiers have handed themselves over to him because ULIMO
6 pushed them until they entered his territory in Gbarnga. On the
7 ground, he gave us the order to withdraw the LDF soldiers and
8 took them to Gbatala base.

9 Q. So, first you said that you heard that over the news, which
12:22:23 10 news are you talking about?

11 A. I meant BBC Focus on Africa. When we retreat he gave an
12 interview about the whereabouts of the NPFL soldiers. He said
13 LDF soldiers handed themselves over to him, so he retreated them
14 and now they are - they are at Gbatala, Cobra Base.

12:22:56 15 Q. You said that, "He gave us the order to withdraw the LDF
16 soldiers and took them to Gbatala base." Who was the "he"? Who
17 gave this order?

18 A. The man is Charles Taylor on the ground. What I was
19 telling you was not true when - what he said over the radio was
12:23:19 20 not true.

21 Q. And when you say, "He gave us the order to withdraw the LDF
22 soldiers to Gbatala base", who are the "us"?

23 A. That is we the LDF fighters, we the LDF soldiers, because
24 we were the LDF soldiers.

12:23:42 25 Q. Thank you, Mr Witness. Now, you testified about the RUF
26 fighting in Lofa County between that period you were there, your
27 assignment. Now, what, if anything, happened to these RUF
28 fighters?

29 A. Tell him when we were retreating from Gbatala, Cobra Base,

1 their commander, Morris Kallon, and some other people and
2 Mustapha were in Gbarnga. I and the other soldiers retreated to
3 Cobra Base.

12:24:41

4 Q. When you say, "We were retreating from Gbatala, Cobra
5 Base", where did you mean?

6 A. I mean we the LDF fighters, among them Sierra Leone -
7 Sierra Leoneans are among. Liberians were also among us.

12:25:09

8 Q. So, you said that Morris Kallon and some other people were
9 in Gbarnga, so what happened to Morris Kallon and the RUF
10 soldiers after that, if anything?

11 A. Morris Kallon and his - Morris Kallon and his bodyguards
12 were the only ones who were with Mustapha Jallow. Him and the
13 other soldiers, who were members of RUF, and the Liberian
14 soldiers retreated to Gbatala, Cobra Base. Then EMG soldiers
15 took over the front line.

12:25:50

16 Q. When you said EMG soldiers, what are you referring to?

17 A. EMG soldier, the NPFL soldiers who were known as Executive
18 Mansion soldiers.

12:26:19

19 Q. Thank you, Mr Witness. So, you testified that you and
20 Mustapha Jallow retreated from Lofa County, LDF soldiers
21 retreated from Lofa County, RUF soldiers retreated from Lofa
22 County. Who else, if anybody, retreated from Lofa County at that
23 time?

24 A. Yes.

12:26:46

25 Q. Can you tell us, Mr Witness?

26 A. Tell him that when we were retreating from Lofa, when LDF
27 was retreating from Lofa, the civilians we went together were
28 over 5,000. These 5,000 civilians, among them were women, men
29 and children, but the men, the youths, most of them were - most

1 of them boarded a truck and they took them for training.

2 Q. Just pause there, Mr Witness, pause there. Who took them
3 for training?

12:28:03

4 A. Tell him EMG soldiers came to take them to a base which
5 they said they opened at Ganta, which was known as Cobra 2. They
6 took these civilians to that place for training. The number of
7 people they took there, through my estimation, could be about
8 2,000.

12:28:31

9 MR WERNER: Now, just pause there, Mr Witness. Ganta is
10 spelled G-A-N-T-A:

11 Q. Now, Mr Witness, you said that 5,000 people retreated from
12 Lofa. Why did these people retreat from Lofa at that time?

12:29:12

13 A. Tell him during the fight the civilians we captured from
14 the villages and in the bush, normally we used to send them back
15 to our CP where they used to stay, civilians. Among them our
16 intelligence we called G2s. Those were responsible for screening
17 them. Whoever is screened to their satisfaction was taken to our
18 CP. That is where these civilians are. These were the people
19 occupying villages from Gorlu to Waterside. When ULIMO was
20 pushing us, we were also retreating. They were also retreating
21 with us. We retreat with them. This is how these civilians came
22 about.

12:29:58

23 Q. Now, Mr Witness, you talked about a G2 and it is not clear
24 on the transcript. Who were these G2s?

12:30:29

25 A. G2s were also NPFL soldiers, but they were responsible -
26 were responsible for the intelligence. They do screen the
27 civilians.

28 Q. You mentioned Waterside. Where was the waterside in Lofa
29 County, if you can remember?

1 A. Tell him Waterside was the border between Bong County and
2 Lofa County. There was a bridge.

3 Q. Can you remember the name of the bridge?

4 A. If I could remember, St Paul. St John, or St Paul.

12:31:23 5 Q. Now, you said that 2,000 civilians were taken for training
6 at a newly opened base called Cobra 2. What, if anything,
7 happened to the civilians?

8 A. The civilians were there for training before our retreats,
9 about three weeks. ULIMO moved up to Gbarnga and occupied.

12:31:59 10 Q. We will talk about that, Mr Witness. Now, you said that
11 the civilians were there for training. Who, if anyone, was
12 training these civilians at Cobra 2?

13 A. NPFL soldiers who were under EMG.

14 Q. Thank you. Now, you explained that you retreated from
12:32:30 15 Lofa, so what happened to you after you retreated from fighting
16 in Lofa?

17 A. I am - these soldiers were staying at Gbatala until ULIMO
18 captured Gbarnga.

19 Q. Okay, so I don't think you answered my question, but that
12:32:59 20 gives me the opportunity to ask you one more question about this
21 training of these 2,000 civilians. You said that they were
22 trained at Cobra 2. What kind of training did they undertake at
23 Cobra 2?

24 A. Tell him that they had their infantry training so that they
12:33:23 25 could be soldiers to go to the war field.

26 Q. Now, my question, Mr Witness, was about yourself. What, if
27 anything, happened to yourself after the retreat from the
28 battlefield in Lofa County? What did you do after that?

29 A. Tell him that I was staying at Gbatala, Gbatala, Cobra

1 Base, I and the LDF soldiers, until ULIMO captured Gbarnga. When
2 ULIMO captured Gbarnga we went back and fight Gbarnga so that we
3 can take it from ULIMO.

4 Q. Mr Witness, just pause there. So, you said that ULIMO
12:34:23 5 captured Gbarnga. Now, this morning you testified about the fact
6 that at one point ULIMO split in factions: ULIMO-K and ULIMO-J.

7 A. Yes.

8 Q. So, if you know, which faction captured Gbarnga?

9 A. Tell him the ULIMO that took Gbarnga was ULIMO-K.

12:34:54 10 Q. When did that happen?

11 A. That was 1994, around end of 1994, around
12 September/October.

13 Q. If you know, where was Charles Taylor when that happened?

14 A. When that was happening Charles Taylor was at Ghana - was
12:35:30 15 in Ghana for a meeting. Most of the leaders of the warring
16 factions were in Ghana for a meeting.

17 Q. And how long were the fighters of ULIMO-K in Gbarnga?

18 A. Tell him that fighting took us for three or two months
19 before we recaptured Gbarnga from them. That operation we refer
12:36:15 20 to as Operation Envelope.

21 MR WERNER: Envelope like the name:

22 Q. Now --

23 A. The name of that operation is Operation Envelope.

24 Q. Can you explain to this Court how did the recapture of
12:36:41 25 Gbarnga take place?

26 A. This was in 1999. If I can remember, it was in December
27 that we recaptured from ULIMO in 1994.

28 Q. And where were you during the time Gbarnga was recaptured?

29 A. At that time I was at Cobra Base, but when we recaptured

1 Gbarnga Charles Taylor called all of us to come to the mansion as
2 - for mansion guard at Gbarnga.

3 Q. When you said that "he called all of us", what do you mean?
4 Who are the "us"?

12:37:37 5 A. I said Charles Taylor called us, we the Gambians who were
6 at Gbatala base, that we should come and be the mansion guards,
7 because at that time he did not trust his people.

8 Q. Just pause there, Mr Witness. When you said he did not
9 trust his people, who are you talking about?

12:38:07 10 A. Tell him I say Liberians because he captured - he captured
11 some of them. He captured some of them who he said were on the
12 side of ULIMO. I am referring to Liberians.

13 Q. If you can remember, you said he captured some of them, who
14 did he capture at that time?

12:38:35 15 A. Tell him his mansion Chief of Staff Cassius Jacobs was
16 captured. He was in custody. I can remember Michael Seboe who
17 was the commander for the Task Force.

18 MR WERNER: Just pause there, Mr Witness. So, Cassius
19 Jacobs was spelled on Friday. Michael Seboe, so Michael, current
12:39:08 20 spelling, and Seboe would be S-E-B-O-E:

21 Q. Now, you said that he captured Cassius Jacobs. What, if
22 anything, happened to Cassius Jacobs?

23 A. Tell him when we recaptured Gbarnga the people I have just
24 mentioned to you were - he killed all of them.

12:39:42 25 Q. Who killed all of them?

26 A. Charles Taylor.

27 Q. You told us about - you told us about Cassius Jacobs and
28 Michael Seboe. If you know, who, if anyone - who else, if
29 anyone, was captured after the recapture of Gbarnga?

1 A. Tell him I can remember six people, but I can remember the
2 name of three of them. They have Liberian names. It was a long
3 time. I have forgotten some names, but I can remember Cassius
4 Jacobs who was then the mansion Chief of Staff, his mansion Chief
12:40:36 5 of Staff. I can remember Michael Seboe who was then the Task
6 Force commander. I can remember Junior Go who was then the Delta
7 Force commander. I can remember the name of these six - these
8 three people, but there were other three people who were with
9 these six, who were with these three commanders.

12:41:06 10 MR WERNER: Thank you, Mr Witness, just pause there.

11 Junior go would be Junior, the current name, and Goe G-O-E:

12 Q. Now, what, if anything, happened to Junior Goe?

13 A. I said these people were all killed.

14 Q. And who killed them?

12:41:28 15 A. Charles Taylor gave order for them to be killed.

16 Q. And, if you know, why did he give this order?

17 A. According to what he said, these people connived with
18 ULIMO. That was the reason why they captured Gbarnga.

19 Q. When you say that is the reason why they captured Gbarnga,
12:41:56 20 who are you talking about?

21 A. I mean ULIMO-K.

22 Q. Now, you said that you were called with the other Gambians
23 to the EMG in Gbarnga. How long did you stay there?

24 A. On that - at that time we spent a long time there, but we
12:42:54 25 used to go to Gbatala. Some day when I have - when it is my day
26 off I used to go to Gbatala. We had spent some time at Gbarnga,
27 about three to four months.

28 Q. And what did you do at Gbarnga when you were there for
29 three or four months, if anything?

1 A. Tell him at that time we used to - we used to guard - we
2 used to guard the Mansion Ground, Charles Taylor's Mansion
3 Ground. At that time our commander was the same Mustapha who was
4 the security commander at the Mansion Ground.

12:43:43 5 Q. When you say Mustapha, are you talking about Mustapha
6 Jallow?

7 A. Yes, I am referring to Mustapha Jallow. He was then the
8 security commander at the Mansion Ground.

9 Q. Now, this morning you told us about communication between
12:44:03 10 Gbarnga and Lofa during your first TDY, the first time you went,
11 in 1992, in Lofa with Mustapha Jallow. Do you remember that?

12 A. Yes, I can remember it.

13 Q. When you were at the EMG in 1994, during these few months
14 what, if anything, did you know about the communication

12:44:34 15 capabilities at the EMG?

16 A. Tell him that at that time the communication was at Mansion
17 Ground, which was the centre - which was the communications
18 centre and, at that time, when we were on our duties most of the
19 time we used to sit in front of the communication house.

12:45:09 20 Sometimes we used to sit in Charles Taylor's bedroom, behind
21 Charles Taylor's bedroom. That is where we used to sit.

22 Q. When you say "we used to sit in front of the communication
23 house", who are you talking about?

24 A. Tell him I said we the Gambians, who were called to be the
12:45:44 25 mansion special guards. We were the ones who used to sit in
26 front of the house.

27 Q. And what, if anything, did you hear at that time when you
28 used to sit in front of the communication house?

29 A. Tell him, yes, we used to hear the communication sometimes

1 when they are communicating with RUF, or when they intercept the
2 ULIMO. When they intercept ULIMO communications we used to hear
3 it.

12:46:25 4 Q. When you said they communicated - sometimes they are
5 communicating with RUF, who were communicating with the RUF?

6 A. I said NPFL. When they are communicating - when NPFL is
7 communicating with RUF, NPFL to NPFL and RUF, when it is
8 intercepted.

12:46:56 9 Q. And how many times did you hear communication between the
10 NPFL and the RUF at that time, during your assignment at the EMG
11 in Gbarnga?

12 A. I cannot tell you the amount, but it is more than three
13 times.

12:47:20 14 Q. If you can remember, what did you - what did you hear? The
15 first time you heard this communication, what, if anything, did
16 you hear?

12:48:01 17 A. Tell him that the first time I came to know about this
18 communication, that day Charles Jackson came and talked to the
19 communication man and told him to contact the RUF side and ask
20 him about the situation there. When Jackson told the
21 communication man about that, the communication man then did his
22 communication, but the report he gave to Jackson, I don't know
23 that.

12:48:31 24 Q. And when you said Jackson, are you referring to General
25 Jackson?

26 A. Yes, I am referring to General Jackson. Charles Taylor's
27 bodyguard, special bodyguard.

28 Q. Now, do you remember the second time you heard a
29 communication between NPFL and RUF at that time?

1 A. I remember at that place, on that time, Yeaten came to the
2 communication man so that he can communicate the RUF territory to
3 ask him about the situation. The communication man did his
4 communication, but the report he gave to Yeaten I cannot say that
12:49:32 5 truly, because at the time he was telling Yeaten I was not there.

6 Q. You told us about three times you heard communication
7 between the NPFL and the RUF. Can you remember the third time?

8 A. On the third occasion was General Jackson. I can remember
9 that.

12:50:02 10 Q. And what can you remember?

11 A. Tell him that this was a normal procedure, I can say, RUF -
12 between RUF and NPFL. NPFL have always - whatever RUF is doing,
13 they must know it, because NPFL recruited RUF. From the start of
14 my evidence I told you that RUF is NPFL's youngsters.

12:50:52 15 Q. Now, Mr Witness, the third time Jackson communicated with
16 the RUF, when did that happen? Which year, if you can remember?

17 MR MUNYARD: Well, in fact he has only mentioned Jackson
18 communicating once before this.

19 MR WERNER: My recollection is two times.

12:51:11 20 THE WITNESS: Two times.

21 MR MUNYARD: He was saying he had overheard communications,
22 or he had been present at communications three times. Once he
23 has mentioned General Jackson, once he has mentioned a man called
24 Yeaten. As I understand it, he has only so far dealt with one
12:51:31 25 prior occasion with General Jackson. If I am wrong, I will be
26 corrected.

27 PRESIDING JUDGE: Wasn't it that the report went to General
28 Yeaten?

29 MR MUNYARD: Yes, the report that he didn't hear. That was

1 the second - he said he heard communications three times. That
2 was his starter. First of all he is asked about General Jackson,
3 he talked about that, then he is asked about an incident with a
4 man he called General Yeaten, he saw him go to ask for a report,
12:52:00 5 but didn't actually see the report, and then we are back to
6 General Jackson. So, if I am correct then it is only two times
7 that he has heard Jackson.

8 PRESIDING JUDGE: I see.

9 MR WERNER: That is what I said: Two times.

12:52:13 10 PRESIDING JUDGE: Very well, Mr Werner. You have heard the
11 objection. What have you to say?

12 MR WERNER: The objection was that we were told only one
13 time about General Jackson and we were told two times about
14 General Jackson, and I was asking the witness about the second
12:52:25 15 time.

16 PRESIDING JUDGE: The second time, very well.

17 THE WITNESS: Tell him that - tell him that I said that the
18 communications Jackson did was on two occasions that I was aware
19 of. That of Yeaten was once. These were the three
12:52:51 20 communications that I can remember.

21 Q. Thank you, Mr Witness. Now, the third communication, the
22 second one with Jackson, if you can remember, when did that take
23 place?

24 A. This was during my attachment at the Mansion Ground while -
12:53:12 25 when I was a bodyguard.

26 Q. Which year was that, if you can remember?

27 A. This was in 1995.

28 Q. Now, Mr Witness, at that time in 1995, as far as you can
29 remember, who, if anyone, was in Belle Yella?

1 A. At that time General Mon Ami was at Belle Yella.

2 Q. Is it the same Mon Ami as the one you talked about this
3 morning?

4 A. Yes, it is the same person.

12:54:01 5 Q. What was he doing in Belle Yella in 1995 in Lofa County?

6 A. Tell him at that time Mon Ami was in charge of Belle Yella.
7 He was the commander.

8 Q. What, if anything, was he doing there?

9 A. At that time Mon Ami used to move from Belle Yella going to
12:54:34 10 Belle Forest. He used to go up to Voinjama.

11 THE INTERPRETER: Your Honours, the witness maybe could be
12 asked to repeat the last bit of his evidence?

13 PRESIDING JUDGE: Why do you want him to repeat the last
14 bit of his evidence, Mr Interpreter?

12:55:00 15 THE INTERPRETER: He has speaking too fast. I did not hear
16 the last bit of his evidence.

17 PRESIDING JUDGE: Mr Witness, the interpreter has found you
18 are speaking too quickly. He has not been able to interpret, so
19 can you repeat the last part of your answer again, please.

12:55:20 20 THE WITNESS: I said that at that time Mon Ami - Belle was
21 a forest, a big forest. He used to enter in that forest and go
22 to Voinjama. Then ULIMO-K was in Voinjama and interrupt their
23 activities there to enter Belle Forest and come up to Zorzor. He
24 sabotaged that place also and sometimes also he used to put land
12:56:29 25 mines on the road so that when these people are coming in
26 vehicles --

27 Q. What happened when these people were coming in vehicles?

28 A. He used to - he used to put land mines on the main highway
29 which was used by vehicles.

1 Q. Who used to put land mines along the road, Mr Witness?

2 A. I said Mon Ami. Mon Ami was the one who used to do that
3 operation.

4 PRESIDING JUDGE: Mr Werner, Who are these people that were
12:57:23 5 coming in the vehicle?

6 MR WERNER: I was going to clarify that:

7 Q. Mr Witness, you said that people used to come by vehicle on
8 the road and Mon Ami put land mines. Who were these people who
9 used to come on the road?

10 A. Tell him ULIMO - main part of Lofa was controlled by
11 ULIMO-K.

12 Q. Now, Mr Witness, in 1995, after the fall and the recapture
13 of Gbarnga, you said that Mon Ami was in Belle Yella and
14 sabotaged missions against the ULIMO-K. Now, what access, if
12:58:08 15 any, at that time was there between Gbarnga and Belle Yella in
16 1995?

17 A. I don't understand that part of your statement. Can you
18 repeat it?

19 Q. I will, Mr Witness. In 1995 was it possible to travel from
12:58:36 20 Gbarnga to Belle Yella?

21 A. People can go from Gbarnga to Belle Yella by vehicle.

22 Q. And for the same period of time, was it possible to travel
23 from Belle Yella to the Sierra Leonean border by bush road?

24 A. Tell him there was access, but it was a footpath. It
12:59:10 25 cannot be a road by vehicles.

26 Q. Thank you, Mr Witness. Now, in 1995, as far as you know,
27 where was Morris Kallon from the RUF?

28 A. At that time Morris Kallon was in our NPFL territory in
29 Gbarnga.

1 Q. What, if anything, was he doing there?

2 A. Tell him at that time Morris Kallon's soldiers, RUF
3 soldiers, who were at Gbatala, we dispersed them from Gbatala.
4 LDF, majority of LDF soldiers went to Statmarin [phon], so at
13:00:16 5 that time Morris Kallon and only four of his bodyguards were at
6 Gbarnga, were with Mustapha in his compound, Mustapha Jallow.

7 THE INTERPRETER: Your Honours, the area the interpreter
8 says, "Statmarin", is not correct. The witness said "Task Force
9 Marine".

13:00:45 10 MR WERNER:

11 Q. So, Mr Witness, what was Task Force Marine?

12 A. I said Strike Force Marine, Strike Force Marine.

13 JUDGE SEBUTINDE: In which case, Mr Werner, then the reply
14 doesn't make any sense at all.

13:01:10 15 MR WERNER: I agree:

16 Q. So, Mr Witness, I asked you what happened, if anything, in
17 1995 to Morris Kallon. Now, you started by saying that RUF
18 soldiers were at Gbatala and were dispersed from Gbatala and then
19 you spoke about LDF soldiers going to Strike Force Marine. Now,
13:01:36 20 after the RUF soldiers were dispersed from Gbatala, where did
21 they go?

22 A. Tell him that RUF soldiers, Morris Kallon with three to
23 four bodyguards, were at Gbarnga, at Mustapha Jallow in Gbarnga.
24 The RUF soldiers who were at Cobra Base with NPFL soldiers --

13:02:13 25 THE INTERPRETER: Your Honours, your Honours, may the
26 witness be asked to repeat that portion of his evidence?

27 PRESIDING JUDGE: Which portion and why do you need it
28 repeated?

29 THE INTERPRETER: From Gbarnga, where he started saying

1 from Gbarnga.

2 PRESIDING JUDGE: Why?

3 THE INTERPRETER: I didn't get it clear.

4 PRESIDING JUDGE: Mr Witness, can you speak more slowly so
13:02:46 5 that the interpreter can keep up with you, please, and can you
6 repeat what you have just said, starting at the part where you
7 were explaining what was happening in Gbarnga.

8 THE WITNESS: I said that when we recaptured Gbarnga Morris
9 Kallon, with his bodyguards, almost three to four people, were
13:03:35 10 left in Gbarnga at Mustapha Jallow. The rest of RUF soldiers,
11 who were then at Cobra Base, where we join those RUF soldiers and
12 NPFL soldiers to disperse them to go and take another assignment
13 under the Strike Force Marine.

14 MR WERNER:

13:04:21 15 Q. Thank you, Mr Witness.

16 JUDGE SEBUTINDE: Did the witness say "we joined those RUF
17 soldiers"? What did he say?

18 MR WERNER:

19 Q. Mr Witness, who joined those RUF soldiers to disperse them
13:04:36 20 to take these other assignments under the Strike Force Marine?

21 A. NPFL soldiers, who were at the base with RUF soldiers, were
22 dispersed to go to Strike Marine Forces to take their assignment.

23 PRESIDING JUDGE: Mr Werner, I find the use of the word
24 "disperse" unclear. As I understood "dispersed" used on previous
13:05:18 25 occasions, it means to send them away, to repel them, to spread
26 them out, or something. My understanding is these two
27 organisations, at some point at least, have been working
28 together. Why are one group dispersing the others?

29 MR WERNER:

1 Q. Did you understand the question, Mr Witness? Why did you
2 say that they were dispersed to the Strike Force Marine division?
3 Why did you use that word?

4 A. I did not understand the English word, but what I meant by
13:05:52 5 that is this: We send them on that assignment under the Strike
6 Force Marine.

7 MR WERNER: It is clear now. It is not clear now?

8 PRESIDING JUDGE: Thank you for the explanation,
9 Mr Witness. Now I understand what you really meant.

13:06:23 10 MR WERNER:

11 Q. Now, Mr Witness, you just spoke about the Strike Force
12 Marine. What was the Strike Force Marine?

13 A. Tell him that Strike Force Marine is also a group, a
14 soldier group, who were under NPFL.

13:07:00 15 Q. In 1995, if you know, who was - who, if anyone, was the
16 commander of the Strike Force Marine?

17 A. Tell him that, if I could remember, in 1995 at that time
18 Sobani was the first person to be there. When Sobani was removed
19 from there and taken to --

13:07:56 20 THE INTERPRETER: Your Honours, could the witness repeat
21 that area, please?

22 PRESIDING JUDGE: Just pause, Mr Witness. Please go back
23 to the beginning of your answer and say it again slowly.

24 THE WITNESS: Okay, tell him that when these people went on
13:08:34 25 that assignment, the NPFL and the RUF soldiers, since they went
26 as the Strike Force Marine, at that time General Sobani was the
27 Strike Force Marine's Chief of Staff, but the person who ended up
28 as the Chief of Staff - because when these people went there and
29 the time Sobani left was not a long time - General Fassu was then

1 the - General Fassu was then the Chief of Staff of the Strike
2 Marine.

13:09:51 3 Q. Okay, just pause there, Mr Witness. So, you said that - I
4 will come to the spelling in one second. You said that General
5 Sobani was the first Strike Force Marine Chief of Staff - Sobani
6 would be S-O-B-A-N-I - and then you said that people were not
7 there for a long time when Sobani left and General Fassu was
8 there. So, we have two spellings for Fassu: F-A-S-U-O, or also
9 spelt F-A-S-S-U. Now, I heard you talking as well and I am not
13:10:35 10 sure it has been transcribed in LiveNote. I heard you say
11 something about Jack the Rebel. Did you mention Jack the Rebel
12 as well?

13 A. Yes, I have mentioned Jack the Rebel. Jack the Rebel.

14 Q. Now, who was Jack the Rebel?

13:11:04 15 A. Tell him that Jack the Rebel was a Liberian. He was the
16 first commander of the Strike Force Marine before Sobani took
17 over as mansion Chief of Staff. This was when Chief Sobani
18 became Strike Force Marine's Chief of Staff.

19 Q. So, Jack the Rebel was Chief of Staff before Sobani, is
13:11:51 20 that correct?

21 A. Yes.

22 Q. And Fassu took over from Sobani, is that correct?

23 A. Yes, that was how it happens.

24 Q. Now, Jack the Rebel, what was the nationality of Jack the
13:12:10 25 Rebel?

26 A. Jack the Rebel I am referring to was a Liberian.

27 Q. Now, who, if anyone else, do you know by the name of Jack
28 the Rebel?

29 A. [Microphone not activated] that original Jack the Rebel was

1 a Gambian, a member of SOFA group, and he was in - he was among
2 NPFL soldiers, the SOFA group, who joined NPFL.

3 Q. Do you know if original Jack the Rebel, Gambian, had a
4 Gambian name?

13:13:12 5 A. Tell him right now I cannot remember, until I recall, but I
6 cannot remember Jack the Rebel's name because even at home he was
7 known as Jack the Rebel and this was the name that people used to
8 call him.

9 Q. Thank you, Mr Witness. Now, talking about Liberian Jack
13:13:47 10 the Rebel, the first Strike Force Marine division Chief of Staff,
11 where was he in 1993, if you can remember?

12 A. In the year 1993 he was the Strike Force Marine commander,
13 but he replaced Nixon Gaye. This Nixon Gaye was the original
14 Strike Force Marine commander.

13:14:36 15 MR WERNER: Just pause there. Nixon Gaye, so Nixon
16 N-I-X-O-N and Gaye G-A-Y-E:

17 Q. When was Nixon Gaye the Strike Force Marine Chief of Staff?

18 A. When I was going to Gbatala base, 1992, I found that Nixon
19 Gaye was the Strike Force Marine's commander until 1990 - I think
13:15:21 20 at the beginning of 1993, if I could recall, this Nixon Gaye was
21 killed by Charles Taylor. Then he was replaced by Jack the Rebel
22 as the commander for the Strike Force Marine.

23 Q. And when was Nixon Gaye killed by Charles Taylor?

24 A. It could be in - at the beginning of 1993.

13:15:57 25 Q. And why was he killed by Charles Taylor?

26 A. Tell him that whoever was killed in Liberia at that time,
27 whoever was killed in Liberia by Charles Taylor at that time,
28 they used to say that he connived with the enemy.

29 Q. Who used to say that?

1 A. We the NPFL soldiers, that is what we used to hear. They
2 said he connived with the enemy.

3 Q. But who used to say that?

4 A. I said whoever was killed that is the reason they used to
13:16:47 5 give. This was what we used to hear: That Mr So was killed
6 because he - because he connived with Mr So.

7 Q. And you said that "that is the reason they used to give",
8 who used to give that reason, Mr Witness?

9 A. Mostly I say we, the NPFL soldiers, that is what we used to
13:17:20 10 hear, but most of the time these executions, SSS used to do it,
11 General Yeaten.

12 Q. And how did you know that?

13 A. Tell him that this execution in most of the time used to be
14 done by General Yeaten. I know that.

13:17:43 15 Q. And how do you know that, Mr Witness?

16 A. Tell him that General Yeaten arrested Nixon Gaye and took
17 him away. When he was taken away nobody saw him again.

18 Q. Now, Mr Witness, you said that Nixon Gaye was the Strike
19 Force Marine division Chief of Staff in 1992/1993. Where was he
13:18:24 20 working at that time?

21 A. Tell him that Strike Force Marine base was at Kakata,
22 behind Kakata rubber plant. They were based there. Strike Force
23 Marine was based at Kakata, behind Kakata rubber plantation.
24 That was where the Strike Force Marine's camp was.

13:19:02 25 MR WERNER: Your Honour, Kakata would be K-A-K-A-T-A:

26 Q. Now, what, if anything, did you hear at that time in
27 1992/1993 about the Strike Force Marine division?

28 A. Strike Force Marine, what I told you about they are members
29 - they are soldiers of NPFL and I know that they are people who

1 used to do dirty operation.

2 Q. And I believe the witness said "dirty operations". It is
3 "detailed operations" here. Did you say "dirty operations",
4 Mr Witness?

13:19:56 5 A. Yes, I said dirty operation.

6 Q. What do you mean when you said that Strike Force Marine
7 division used to do dirty operations? What do you mean?

8 A. Tell him that - tell him that their motto was that maximum
9 death and destruction at a minimum time. This is the motto of
10 Strike Force Marine.

11 Q. And how did you learn about that?

12 A. Tell him that I said that is their motto. Even the
13 T-shirts that they wear, it is what is written on those T-shirts.
14 This was their motto.

13:21:07 15 Q. And what, if anything, did they do at that time in
16 1992/1993?

17 A. Whatever dirty thing you know to be done during the
18 fighting, these people used to do it, even eating people. Among
19 them there were cannibals.

13:21:36 20 Q. Now, when you say "whatever dirty thing you know", what
21 were you talking about?

22 A. I said that there is no dirty thing that could be more than
23 eating human flesh.

24 Q. And who were eating human flesh, Mr Witness?

13:22:03 25 A. Tell him that these Strike Force Marine members, majority
26 of them eat human flesh.

27 Q. How did you know about that?

28 A. Tell him that I said I was a soldier in NPFL. There was
29 nothing that was going on under NPFL soldiers that I don't know.

1 Q. Mr Witness, you said that the Strike Force Marine division
2 was based in Kakata and as far as I understand your evidence you
3 were never based at Kakata, so how did you know about what the
4 Strike Force Marine division members were doing?

13:23:04 5 A. Tell him that these people used to go and take an
6 assignment if Charles Taylor wanted to clear something quickly.
7 If something happens and Charles Taylor want to clear - it clear
8 quickly, mostly he send these people on that mission. These
9 people are also - these people are also people that we train at
13:23:40 10 our base. They come there to take their advanced commando
11 training. We used to sit with them and chat. What - they used
12 to tell us what they do. That is not something hidden from us.
13 Even sometimes there was a time in 1993 a report came - a report
14 came from Kakata to Mansion Ground, where Charles Taylor was, to
13:24:17 15 inform him that Strike Force Marine are disturbing the civilians
16 around that area. They attack people and take them to the bush
17 where they were and those people will never come back to their
18 homes. What I am saying, Charles Taylor himself, this Charles
19 Taylor who is sitting down, knows about it.

13:24:51 20 Q. Now, Mr Witness, you said that if Charles Taylor wanted to
21 clear something quickly he would call them. What did you mean
22 when you said if he wanted to clear something quickly?

23 A. That is when something happens at a place that if an enemy
24 enters at a place, or they suspect at a place, they don't trust
13:25:27 25 the place, these were the people that they sent to that place in
26 most of the time.

27 Q. They send them there to do what?

28 A. Tell him that these people have no sympathy. Wherever they
29 go to, they had no choice.

1 Q. So, what do you mean when you say they have no sympathy?

2 A. When they enter a place they have no choice. I told you
3 their motto, what their motto means.

4 Q. So, what do they do when they enter a place then?

13:26:26 5 A. These people do not have a choice for any civilian, or any
6 other person. They kill until they know they want what they
7 wanted, until their mission is accomplished.

8 PRESIDING JUDGE: Mr Witness, do you mean they do not give
9 people a choice when they enter - when they enter a place they
13:26:55 10 don't discriminate? Is that what you mean?

11 THE WITNESS: They have no choice. They kill
12 indiscriminately. No elder, no child, no man, no woman.

13 MR WERNER:

14 Q. Why do you say they didn't have any choice?

13:27:28 15 A. I don't think you hear what I am saying. I said these
16 people have no choice. Wherever they enter, maximum death and
17 destruction is what they do. That is their motto.

18 MR WERNER: Thank you, Mr Witness.

19 PRESIDING JUDGE: Mr Werner, I note the time is seven
13:27:59 20 minutes to.

21 MR WERNER: It is a convenient time, your Honours.

22 PRESIDING JUDGE: Is this appropriate.

23 MR WERNER: Yes, it is.

24 PRESIDING JUDGE: Very good. Mr Witness, we will now take
13:28:07 25 the lunchtime adjournment. We will resume at 2.30. Please
26 adjourn Court until 2.30.

27 [Lunch break taken at 1.30 p.m.]

28 [Upon resuming at 2.30 p.m.]

29 PRESIDING JUDGE: Mr Werner, please proceed.

1 MR WERNER: Thank you, Madam President.

2 Q. Good afternoon, Mr Witness. Mr Witness, good afternoon.

3 A. Good afternoon.

14:31:31

4 Q. Mr Witness, this morning you testified about the fact that
5 when you retreated in 1994 from Lofa County civilians were
6 captured from villages near the bush. Do you remember saying
7 that?

8 A. Yes.

14:31:55

9 Q. And you testified about the fact that there were about
10 5,000 civilians and they were taken to your CP in Gorlu. Do you
11 remember saying that?

12 A. I said more than 5,000 people.

13 Q. And do you remember saying that they were taken to your CP?

14 A. Yes.

14:32:18

15 Q. And later you said that these civilians which you retreated
16 with, you and the NPFL to Gbarnga. Do you remember that?

17 A. Yes.

18 Q. Now, Mr Witness, these more than 5,000 civilians who
19 retreated from Gorlu to Gbarnga, did they have a choice to come
20 with you to Gbarnga?

14:32:46

21 A. What type of choice, to come back to who?

22 Q. From Gorlu, the CP where they were taken, then you said
23 that they retreated to Gbarnga. Now did this more than 5,000
24 civilians have a choice when they retreated from Gorlu to
25 Gbarnga?

14:33:13

26 A. Tell him that because of war it was not their choice for
27 one to leave his village and go to another area.

28 Q. So why did they retreat to Gbarnga then?

29 A. Because they cannot return from where they came from. It

1 will be risky for them to go back, because if they want to go
2 back to where they come from ULIMO can kill them. They can say
3 that you are - you have connived with NPFL.

14:34:22 4 Q. Now later you said that in Gbarnga there were 2,000 of them
5 who were taken to Cobra 2 in Ganta for training. Do you remember
6 saying that?

7 A. Yeah, tell him that, yes, I said that.

8 Q. Now how were these 2,000 civilians out of the more than
9 5,000 who retreated, how were these 2,000 civilians selected to
14:34:52 10 go to Cobra 2 for training?

11 A. Tell him that these were the people that they think - the
12 youths, the youths who are healthy, they think who can fight for
13 them.

14 Q. And what were the age groups of these youths, Mr Witness?

14:35:19 15 A. Their age - their age could be from - some of them can be
16 15 years, others could be over 30 years, others 20 something
17 years, some 18 years.

18 Q. Now, Mr Witness --

19 THE INTERPRETER: Your Honours, please remind counsel to
14:35:50 20 speak a little bit louder.

21 MR WERNER: I will:

22 Q. Now do you remember on Friday you told us about the Cobra
23 1, the original Cobra at Gbatala? Do you remember that?

24 A. Yes. Tell him Cobra 1 was the original Cobra at Gbatala.

14:36:26 25 Q. And you told us about SBUs being trained at Gbatala?

26 A. Yes, I can remember that.

27 Q. And you said that after the training these SBUs were sent
28 to the various NPFL units. Do you remember that?

29 A. I said that.

1 Q. Now, Mr Witness, if you know what, if anything, did they
2 do, the SBUs when they were sent to their NPFL units after
3 training at Cobra?

14:37:11 4 A. At Gbatala where they were taken, some were stationed at
5 the mansion ground, the Charles Taylor security ground. Some of
6 them, they dispersed them to different places so that normally
7 these SBUs are used to harass, to harass NPFL soldiers.

8 Q. Just pause there, Mr Witness. Could you explain what you
9 mean when you say that these SBUs unit when they were sent to
14:37:50 10 their NPFL unit they were used to harass NPFL soldiers? What do
11 you mean?

12 A. That is mostly these people used to be behind - SBUs used
13 to have their ghettos behind the front line. When you come as an
14 NPFL soldier they will - they harass you and ask you to go back
14:38:28 15 of the front line.

16 Q. When you said that the SBUs --

17 THE INTERPRETER: Your Honours, I want to make a correction
18 there from the interpreter's booth. The area where the
19 interpreter said "disperse", the word is dispatched. And where
14:38:45 20 he said "ghettos" the word is gates.

21 MR WERNER: Thank you, Mr Interpreter:

22 Q. And who would then go back to the front lines?

23 A. NPFL soldiers who were in the front line are the ones I'm
24 talking about.

14:39:20 25 Q. Thank you, Mr Witness. Now this morning you told us about
26 Nixon Gaye who in 1992 and 1993 was the Strike Force Marine chief
27 of staff. Do you remember that?

28 A. Yes, I can remember that.

29 Q. At that time, the time you were talking about in 1992,

1 1993, if you know did Nixon Gaye report to anyone?

2 A. No, he used to report to Charles Taylor.

3 Q. Thank you, Mr Witness. Now on Friday you told us about a
4 time when you went just for two weeks to work with Mustapha

14:40:21 5 Jallow at Zorzor. Do you remember that?

6 A. Yes, I can remember that.

7 Q. I believe it was before your first TDY in Lofa. Is that
8 correct?

9 A. Yes, that was my first trip.

14:40:39 10 Q. And you testified that Mustapha Jallow was at Zorzor and
11 then there were other NPFL commanders with soldiers in other
12 villages in Lofa at that time. Do you remember saying that?

13 A. Yes, I can remember that.

14 Q. Now who were these other NPFL commanders in Lofa in 1992,
14:41:09 15 if you can remember?

16 A. Tell him at that time NPFL and soldiers were at Lofa
17 County, but then the - who was in charge of the soldiers at that
18 time, who has the highest rank was Mustapha. Although in the
19 other districts there are commanders, people were chosen as
14:42:00 20 commanders, but those people were in charge for only districts.
21 The one I can remember was Foya district commander, that is Faya
22 Tamba.

23 THE INTERPRETER: Again, your Honours, the word is not
24 fire, the word is Foya district. Foya.

14:42:32 25 MR WERNER:

26 Q. Now, Mr Witness, what at that time, beginning of 1992 when
27 you were in Lofa, what if anything did you hear about the
28 treatment of civilians in Lofa County?

29 A. At that time during the war at Lofa the civilians who used

1 to come from Sierra Leone who retreat to Liberia, at that time
2 those civilians who retreat to Lofa.

3 Q. Yes, what happened to them?

4 A. Tell him that these Sierra Leoneans, the civilians who
14:43:26 5 retreated from Sierra Leone to Liberia at that time, the ones I
6 saw with my eye, some of them women and men, children, some of
7 them were maltreated because some of the women allege that they
8 were raped. Some other people were amputated. I saw those
9 people and I witness it.

14:44:15 10 Q. How did you know that some of these women retreating from
11 Sierra Leone at that time alleged they were raped? How did you
12 know about that?

13 A. I said that, tell him that I saw these people and we used
14 to talk to them.

14:44:44 15 Q. And what did they tell you, if anything?

16 A. Among them the girls who were disvirgin [sic], I saw them,
17 and they also told us. The ones that were amputated, even if I
18 do not - I don't tell you, but I saw them.

19 JUDGE SEBUTINDE: Mr Werner, it's not clear, where did
14:45:23 20 these things happen to these people? Did it happen when they
21 retreated or before they retreated or what?

22 MR WERNER: I was going to try to clarify that, your
23 Honour, thank you:

24 Q. So you told us about women who had been raped and you told
14:45:38 25 us about seeing people who had been amputated. If you know,
26 where did that happen?

27 A. Tell him that these - the people I saw came from Sierra
28 Leone to Liberia and I saw them at Lofa County. The ones who
29 entered into Liberia to seek refuge in Liberia, they are refugees

1 in Liberia.

2 Q. And did they tell you anything about who committed these
3 amputations?

4 A. Yes, they told me, some of them. The ones I know among
14:46:33 5 them told me that RUF soldiers did it to them, our own people who
6 were there.

7 Q. What do you mean when you say - you spoke about RUF
8 soldiers and then you said our own people who were there. What
9 did you mean?

14:46:53 10 A. Tell him that RUF soldiers were members of the NPFL
11 soldiers. Earlier I told you that they are brothers. So
12 whatever RUF did I can - I could say that they were my people.

13 Q. When you say Whatever RUF did I could say they were my
14 people what do you mean?

14:47:36 15 A. Tell him that RUF, RUF soldiers are - not only Sierra
16 Leoneans are RUF. The Liberian NPFL soldiers were fighting under
17 RUF. Tell him what I am telling you, it's a clear thing that I
18 know.

19 Q. Thank you, Mr Witness. Now you spoke about seeing people
14:48:31 20 and talking with people who retreated from Sierra Leone and you
21 said that - sorry, your Honours.

22 PRESIDING JUDGE: I'm hearing a different language, Madam
23 Court Attendant, and so is Justice Sebutinde. Could you just
24 check what channel we're on, please?

14:49:04 25 MS IRURA: Your Honour, I will confirm that the
26 interpreters are on the right channel.

27 PRESIDING JUDGE: Please proceed, Mr Werner.

28 MR WERNER:

29 Q. So you told us about civilians retreating from Sierra Leone

1 to Liberia and you said that some were raped. Now who, if
2 anyone, raped the people who retreated from Sierra Leone to
3 Liberia?

4 A. Tell him that I know people among them.

14:49:46 5 Q. And did they tell you anything about who did that to them?

6 A. No, I was not told any soldier's name, but they told me
7 that it was RUF soldiers who did that to them, but they did not
8 mention a particular name to me.

9 Q. Thank you, Mr Witness. Now during the same time in Lofa,
14:50:20 10 during the two weeks you spent there, did you have access to a
11 commercial radio?

12 A. What type of radio? Is it our communication radio?

13 Q. A commercial radio?

14 A. For me to be talking over that?

14:50:47 15 Q. A commercial radio where you can hear FM stations or AM
16 stations?

17 A. No, tell him that I do not have access to listen to that.

18 Q. Now what about the time that you were in your first TDY in
19 Lofa County, did you have access to any commercial radio?

14:51:21 20 A. Tell him no, at that time there was only one - I have only
21 - there was only one radio in the NPFL territory and that radio
22 was under the command of Charles.

23 Q. Now you said that there was only one radio in the NPFL and
24 that the radio was under the command of Charles. Who is Charles?

14:51:59 25 A. Charles Taylor.

26 Q. Where was this radio?

27 A. This radio was situated at Gbarnga.

28 Q. And how did you know about that?

29 A. Tell him that this radio station was the station that

1 everyone in Liberia was listening to, FM station.

2 Q. And do you know which FM station it was?

3 A. I said this FM station was at Gbarnga, NPFL territory
4 Gbarnga.

14:52:44 5 Q. So, Mr Witness, this morning you told us about the last TDY
6 you spoke about when you were at the EMG at Gbarnga. Do you
7 remember talking about that?

8 A. My last TDY I was at Gbarnga, Executive Mansion.

9 Q. And at that time did you yourself have access to a
14:53:14 10 commercial radio during this last TDY?

11 A. I said tell him that I did not have access to commercial
12 radio. Even if I had I will not - I will not talk over the
13 commercial radio. That means I want to kill myself.

14 Q. I think it's probably my mistake. I'm not putting it very
14:54:02 15 clear. This morning, Mr Witness, do you remember hearing some
16 broadcasts over the BBC, do you remember saying that?

17 A. Tell him this was a small radio that people used to listen
18 to news. It's a small radio.

19 Q. And at the time you were in Gbarnga during your last TDY
14:54:32 20 did you listen to this small radio?

21 A. Yes, wherever I am I have a radio, a 12 metre band radio.

22 Q. And at that time when you were at Gbarnga what if anything
23 did you hear about the conflict in Sierra Leone?

24 A. Tell him that I have ever heard during an interview where
14:55:17 25 Foday Sankoh himself was interviewed. He was asked about the
26 atrocities which were committed in Sierra Leone, but his response
27 to the questions he was asked was that he was not aware of that
28 and did not know it. This was in BBC Focus on Africa.

29 Q. And putting aside this --

1 MR MUNYARD: Before we move off that can we know when this
2 was?

3 MR WERNER: Yes:

14:56:05

4 Q. When did you hear that interview, Mr Witness? Could you
5 remember the year?

6 A. Tell him that I can remember that. I think that was during
7 1993. If I could recall, it was in 1993.

8 Q. And where were you at that time?

14:56:36

9 A. 1993 I was at Gbatata before I undertake the assignment
10 LDF.

11 Q. And at that time when you were at Gbatata in 1993, putting
12 aside this interview of Foday Sankoh over the BBC, did you hear
13 anything else about the conflict in Sierra Leone?

14:57:01

14 A. Tell him that this was every time during the period of this
15 1993, 1994, 1995, during Sierra Leone war, Focus on Africa used
16 to broadcast the conflict in Sierra Leone and Liberia.

17 Q. And what did you hear about the conflict in Sierra Leone?

14:57:25

18 MR MUNYARD: I'm going to object at this point because this
19 is bit like asking somebody have you listened to - it is the same
20 as asking somebody have you listened to the news. The question
21 has got to be more specific than that in order to be relevant for
22 this Court.

14:57:39

23 PRESIDING JUDGE: Yes, Mr Werner, you've heard the
24 objection and I also would like to know what the relevance of
25 this question is.

26 MR WERNER: I will move forward. I will move forward, your
27 Honours:

28 Q. Now, Mr Witness, you told us that you were at the EMG this
29 morning and then until 1995. What happened to you after that --

1 PRESIDING JUDGE: Mr Werner, he wasn't at EMG this morning.

2 MR WERNER: Sorry, your Honour:

3 Q. You told us this morning that in 1995 you were in your last
4 TDY at the EMG in Gbarnga. Do you remember saying that?

14:58:20 5 A. Yes, I can remember that.

6 Q. So what happened to you after that, after that TDY?

7 A. Tell him that after the TDY I returned back to the base, I
8 was at the base but did not spend longer time there. Then I
9 continued to Luguato border. At that time I was informed that
10 our leader was at Danane.

14:59:06

11 MR WERNER: Luguato was spelled already:

12 Q. Now who was your leader, Mr Witness?

13 A. Dr Manneh, Kukoi Samba Sanyang.

14 Q. What, if anything, happened after that?

14:59:27

15 A. Then we went to answer to his call at Danane. When we went
16 to Danane he told us that he had a discussion with Senegalese
17 government so that they can negotiate between ourselves and
18 Gambia government so that we could return to The Gambia, because
19 at that time there was a new government in The Gambia so he hoped
20 that we can negotiate with them for our return.

15:00:08

21 Q. So, Mr Witness, did you go to The Gambia?

22 A. Tell him that we were on that program until 1996, because
23 this was around the end of 1995. 1996, March, around end of
24 March. At that time they wanted to form an interim government in
25 Monrovia. Charles Taylor went to Monrovia. We also selected
26 some few people who joined me who came to Dr Manneh, Danane in
27 Cote d'Ivoire. March, April, around end of April we left Danane
28 and went to Senegal.

15:00:52

29 Q. And what happened when you went to Senegal?

1 A. When we went to Senegal their government welcomed us. At
2 that time Abdou Diouf was the president. They lodge us and we
3 are doing - provide us with food. They form a delegation for us
4 and the leader of the delegation was General One.

15:02:22 5 MR WERNER: Abdou Diouf, the president of Senegal at that
6 time was D-I-O-U-F:

7 Q. Now, Mr Witness, which year was it when you went to
8 Senegal?

9 A. Tell him this was in 1996.

15:02:42 10 Q. Mr Witness, do you know - did you come back to Liberia at
11 any point in time?

12 A. Tell him that the negotiation we were supposed to have
13 failed. We were arrested and detained and said that we were
14 dissidents. So when we were released in 2000, 1st December I was
15 released, I tried and came back to Liberia in 2002. Around end
16 of 2002 I came back to Liberia.

17 Q. Now when you came back to Liberia do you remember the month
18 in 2002 when you came back to Liberia?

19 A. Tell him that if I could recall it was in October.

15:04:10 20 October. If I could recall it was September, October 2002.

21 Q. And who, if anybody, did you see when you came back to
22 Liberia in October 2002?

23 A. When I returned to Liberia I found some of our people had a
24 problem with Charles Taylor, our Gambians. So upon our arrival
25 at Monrovia at that time one of our Gambian was at Gbatala base
26 as commander. The time I returned there I found that ATU was
27 turned - Gbatala was turned to ATU base.

28 Q. Now this morning you told us about Mustapha Jallow. Where
29 was Mustapha Jallow at that time when you returned to Liberia in

1 October 2002?

2 A. Tell him that at that time Mustapha Jallow was in Monrovia.
3 Musang Yai was also there. Mohamed, Jack the Rebel and many
4 other people, our Gambians.

15:06:16 5 Q. What were they doing there at that time?

6 A. At that time I can say they had no fixed place. They had
7 their ranks but they were not given any responsibility at that
8 time. There was only one man I found who has an important
9 responsibility and that is General Yanks, because he was
10 appointed as Libyan ambassador.

15:06:56

11 MR WERNER: Yanks was spelled on Friday, I believe:

12 Q. Now, Mr Witness, when you came back in 2002 where was
13 Ibrahim Bah?

14 A. At that time I found that Ibrahim Bah has absconded out of
15 Liberia. He was in Burkina.

15:07:34

16 Q. And did you speak with Mustapha Jallow about Ibrahim Bah
17 when you came back?

18 A. Tell him that Mustapha on the other side is my relative,
19 because he was my nephew, so when I left he was taking care of my
20 family. When I came we saw each other and had a discussion.

15:08:14

21 Q. What did he tell you?

22 A. What he told me was that Ibrahim Bah, after when I left, he
23 was a liaison officer between NPFL and RUF. At that time he used
24 to go to Sierra Leone and come back. He was engaged in diamond
25 business between Charles Taylor and RUF. So he was engaged in
26 this business. Until one of his trip, before we came back, he
27 came to Monrovia with some diamonds on that trip, took it to the
28 mansion to Charles Taylor, but I think, what he told me,
29 Charles Taylor was supposed to do for Ibrahim Bah, he did not do

15:09:05

1 it. So he - then he planned to eliminate - to kill him.

2 Q. Pause there, please. Now you said that he was engaged in
3 this business and one of his trips we came back and he came back
4 to Monrovia with some diamonds. Sorry, before we came back he
15:10:30 5 came back to Monrovia with some diamonds. So when you say until
6 one of his trips we came back, who are you talking about?

7 A. No, I said when he - on one of his trips when he returned
8 to Monrovia, his last trip before we came back to Monrovia. That
9 was before we came to Monrovia. They said he had brought some
15:11:13 10 diamonds for Charles. Mustapha was the one who told me this,
11 that when he brought - when Ibrahim Bah brought these diamonds
12 for Charles, Charles was supposed to give him something that he
13 was supposed to take back to RUF soldiers.

14 Q. You said that he had brought some diamonds for Charles.
15:11:55 15 Who is he? Who are you talking about?

16 A. I'm referring to Ibrahim Bah. Ibrahim Bah.

17 Q. You are talking about a last trip where he brought some
18 diamonds for Charles Taylor. Were you told where he was coming
19 from when he came to Monrovia?

15:12:21 20 A. Yes. Tell him that at that time he was coming from Sierra
21 Leone RUF to Liberia, because before we returned to Monrovia
22 Ibrahim Bah and Charles were engaged in this business.

23 JUDGE SEBUTINDE: Mr Werner, there is a statement that the
24 witness made to the effect so he then - then he planned to
15:13:01 25 eliminate, to kill him. It's not clear who planned to kill or
26 eliminate who.

27 MR WERNER: Yes, thank you, your Honour:

28 Q. Mr Witness, you said that he planned to eliminate him. So
29 who planned to eliminate him?

1 A. Tell him that Charles Taylor wanted to kill Ibrahim Bah.
2 At that time on that trip they said Ibrahim Bah was at Hotel
3 Africa, that is where he lodged. It was people who informed
4 Ibrahim Bah about that if he did not go out of the country they
15:13:54 5 will kill him.

6 Q. Did you learn why Charles Taylor wanted to kill Ibrahim
7 Bah?

8 A. Tell him that that is a habit to Charles. He just
9 disappointed him as he had disappointed our other people.

15:14:29 10 Q. Mr Witness, when you say he just disappointed him, who
11 disappointed him?

12 A. Tell him that Charles disappointed Ibrahim Bah. He wanted
13 to kill him. That was why Ibrahim Bah absconded to Burkina.

14 Q. Now you talked about this, about the fact that you were
15:15:07 15 told by Mustapha Jallow that Ibrahim Bah was a liaison between
16 Charles Taylor and the RUF. Did Mustapha Jallow explain how he
17 knew about that?

18 A. Yes, what I am explaining to you is Mustapha who told me
19 that.

15:15:32 20 Q. And my question was when he told you that did Mustapha
21 Jallow explain how he himself, Mustapha Jallow, knew about that?

22 A. Tell him that whatever Ibrahim Bah was doing in Liberia,
23 Mustapha knew something about that because Mustapha was the one -
24 Mustapha Jallow was the one who had - who used to discuss his
15:16:21 25 secrets, because Mustapha was closer to Ibrahim Bah than any of
26 us the Gambians, any of us, any of we the Gambians. And also
27 when Ibrahim Bah came from Sierra Leone before he could see
28 Charles he used to see Mustapha first and Musang Yai.

29 Q. Thank you, Mr Witness. Now on Friday and then several --

1 MR MUNYARD: Sorry, before we leave this particular subject
2 it may just be me, but we've heard from this witness over three
3 days now about Mustapha Jallow. If I heard him correctly he
4 described Mustapha Jallow as he, the witness's, nephew just now
15:17:21 5 at the beginning of this account and I'm just wondering if that's
6 right because he's been mentioned so often it struck me that it
7 might be some other Mustapha that is his nephew but we hadn't
8 heard it until today.

9 MR WERNER: I will clarify that:

15:17:40 10 Q. Now, Mr Witness, you said that Mustapha was your nephew.
11 Who were you talking about?

12 A. Tell him that - tell him that Mustapha Jallow, General
13 Mustapha Jallow, who was one time LDF commander and also became
14 EMG security commander was my nephew.

15:18:21 15 Q. I have one last question for you. You told us on Friday
16 and then several times today that the RUF was the brother of the
17 NPFL and today you said that RUF were the younger brother of the
18 NPFL. What did you mean when you said that?

19 A. RUF - tell him that NPFL were the seniors of RUF because if
15:19:20 20 you see that RUF was able to enter into Sierra Leone to gain
21 power it was through the help of NPFL, because when the RUF
22 started the war in Sierra Leone at that time I was not in
23 Liberia, but at the time I was entering in Liberia 1991 I said I
24 found - found some of our people, the Gambians, who were given an
15:20:02 25 assignment with RUF. I saw NPFL soldiers, the Liberians, who
26 were with RUF. And since in Burkina my leader Dr Manneh, what he
27 told me was that we, the Gambians, SOFA, and the Sierra Leoneans
28 will join Charles Taylor to help him in his fighting and
29 Charles Taylor will also help us to fight in our country.

1 MR WERNER: Thank you, your Honour. I have concluded my
2 examination-in-chief.

3 PRESIDING JUDGE: Thank you, Mr Werner. Mr Anyah or
4 Mr Munyard, who is taking cross-examination?

15:21:14 5 MR MUNYARD: Madam President, it's me who is going to
6 cross-examine this witness and again if you'd give me just a
7 moment to organise my papers.

8 THE WITNESS: Yes.

9 CROSS-EXAMINATION BY MR MUNYARD:

15:22:19 10 Q. Mr Camara, could I just check one thing with you first of
11 all, is it right that you told us that you were born in 1964? Is
12 that your year of birth?

13 A. Tell him yes, I was born in that year.

14 Q. And would it also be correct to say that a great deal of
15:22:49 15 the evidence that you've been giving to this Court is evidence of
16 what other people have told you rather than things that you
17 actually saw or heard yourself? That is right, isn't it? That
18 was a question, Mr Camara, could you answer it, please?

19 THE INTERPRETER: Your Honours, can the learned counsel
15:23:27 20 please slow down.

21 MR MUNYARD: I've been asked to slow down.

22 PRESIDING JUDGE: Mr Interpreter, I thought Mr Munyard was
23 speaking quite evenly.

24 MR MUNYARD: I'm normally accused of speaking either too
15:23:40 25 quietly or too slowly, but this is a first. I'm quite happy to
26 repeat myself:

27 Q. Mr Camara, is it correct that a great deal of the evidence
28 that you have given to this Court is evidence of what other
29 people have told you rather than things that you have seen or

1 heard yourself? Maybe I was too quiet.

2 PRESIDING JUDGE: Mr Interpreter, did you hear the question
3 and have you asked the witness the question?

4 MS IRURA: Your Honour, I will confirm.

15:25:44 5 THE INTERPRETER: Your Honours, could I learned counsel
6 please repeat his question.

7 PRESIDING JUDGE: Mr Munyard, you've heard the interpreter
8 ask if you would repeat your question, please.

9 MR MUNYARD:

15:25:57 10 Q. Mr Camara, it's right, is it not, that a great deal of the
11 evidence that you've given to this Court over the last three days
12 is evidence of what other people have told you rather than things
13 that you actually saw or heard yourself?

14 A. Whatever I said here, most of that I saw it, I saw it with
15:26:37 15 my eye. Some of that evidence I could say I heard from people,
16 but 75 per cent of what I said here I saw it with my eye, it was
17 in my presence.

18 Q. Well, we'll come back to the percentages, but just to deal
19 with one of the last things that you told the Court was all about
15:27:07 20 Ibrahim Bah and his dealings with Mr Taylor. You didn't see any
21 of that, did you?

22 A. Tell him that if you talk about Ibrahim Bah I could say I
23 did not see that with my eye, but I was told.

24 Q. I'm going to come back to the story that you were told by
15:27:40 25 the man we've just learned is your nephew, but you neither saw
26 nor heard any of Ibrahim Bah's dealings with Charles Taylor, did
27 you? Did you?

28 A. Tell him that these were not in - were not in my presence,
29 because after when I left Monrovia that Ibrahim Bah was having

1 deals with Charles. When I returned to Liberia in 2002 my nephew
2 told me, Mustapha Jallow, because I ask about Ibrahim Bah.

3 Q. You didn't spend any time on jungle paths going through to
4 Belle Yella Forest, did you?

15:28:45 5 A. What do you say I did not do? Can you repeat what you have
6 just said.

7 Q. You didn't spend any time on jungle paths going through to
8 Belle Yella Forest, did you?

9 A. Tell him that when I was at Lofa we used to - we used to
15:29:10 10 leave Gorlu, we used the footpath in the forest, we used to go up
11 to Mon Ami's territory at Belle Yella.

12 Q. You're saying now that you did that yourself, are you? Is
13 that what you're telling the Court now, that you personally went
14 to Belle Yella on bush paths?

15:29:46 15 A. Tell him that I have - I myself have ever did that.

16 Q. Are you saying you did, or you didn't? I'm sorry, I didn't
17 quite understand that translation?

18 A. Tell him that I say I personally had ever did that, I have
19 ever walk on foot.

15:30:21 20 Q. I'm going to try one more time and then I'm going --

21 PRESIDING JUDGE: Just a minute. Mr Interpreter, I don't
22 understand the expression "I had ever did that". What do you
23 mean?

24 THE INTERPRETER: That I have --

15:30:37 25 PRESIDING JUDGE: Does it mean he did do it, or he did not
26 do it?

27 THE INTERPRETER: Your Honours, could the witness repeat
28 it, please.

29 PRESIDING JUDGE: No, I'm asking a question. The

1 interpretation was, "I personally had ever did that". It's been
2 said twice. What does it mean?

3 THE INTERPRETER: Your Honours, to clarify the point I want
4 to step in so that I can make it clear. The interpreter who was
15:31:16 5 on the line used that expression. I am also confused.

6 PRESIDING JUDGE: Mr Munyard, let's start from the
7 beginning. Please put your question again and, Mr Witness,
8 please answer again.

9 MR MUNYARD:

15:31:31 10 Q. Mr Camara, answer yes or no if you would. Did you ever
11 yourself go on bush paths to Belle Yella Forest?

12 A. Tell him yes.

13 Q. From where?

14 A. At that time we were on the LDF operation in Lofa from
15:31:57 15 Gorlu to go there.

16 Q. And you went from Gorlu to Belle Yella. Is that right?

17 A. Tell him yes.

18 Q. Did you go beyond Belle Yella to Sierra Leone ever?

19 A. Tell him that I have never done that.

15:32:22 20 Q. Have you gone any further than Belle Yella, the town or
21 village on a bush path?

22 A. Tell him that no.

23 Q. I want to ask you some more general questions and then we
24 will come back to your time in Lofa in due course. Now the

15:32:45 25 evidence that you've given covers your time in Liberia from late
26 1989 or the beginning of 1990 up to a time around the middle of
27 1996 and then again late 2002 to a time some time in 2003. That
28 is correct, isn't it?

29 A. Tell him that I did not tell you that I was in Liberia in

1 1989 and I did not tell you that I was in Liberia in 1990. I
2 said that I went to Liberia in 1991.

3 Q. I should have prefaced my question with the time bracket of
4 your evidence is concerning events from late 1989 to around the
15:33:48 5 middle of 1996. We then have a gap and you start again in late
6 2002 to some time in 2003. That's a fair way of putting it,
7 isn't it?

8 A. Tell him that I cannot understand that. Start from 1991 to
9 2002.

15:34:19 10 Q. I'm actually agreeing with you in broad terms. I don't
11 want to spend any more time on this, Mr Camara. Your evidence
12 does not concern the period from the middle of 1996 until some
13 time late in 2002, does it?

14 A. Yes, I left there in 1996 and returned back there in 2002.

15:34:50 15 Q. When you left again, when you left Liberia in 2003 where
16 did you go?

17 A. Tell him that our president Yahya Jammeh sent a plane for
18 we the Gambians in Monrovia so that we could go back to The
19 Gambia. We left there one month. Charles Taylor also left there
15:35:37 20 and went to Nigeria.

21 Q. Can you help us with this: How did it happen that in the
22 year 2006 you came to be interviewed by investigators from the
23 Special Court for Sierra Leone?

24 A. What do you say?

15:36:22 25 Q. How did it happen that in 2006 you came to be interviewed
26 by investigators for the Special Court for Sierra Leone?

27 A. Tell him that unless you ask them, because how they know me
28 in The Gambia until they had to come for me I do not have that
29 knowledge. Maybe somebody told them about me.

1 Q. So is this what you're saying, that it was investigators
2 from the Special Court who made contact with you rather than you
3 making contact with them?

4 A. Tell him that what I am telling you here, what I know was
15:37:24 5 what I am telling you. Whatever is beyond my knowledge I know
6 nothing about that. How they came to know me in The Gambia until
7 they had to come for me, I don't know that.

8 Q. When they came for you were you willing to be interviewed
9 by them?

15:37:54 10 A. Tell him even where I am sitting as now, nobody forced me
11 to talk. It was through my free will that I decided to talk to
12 them.

13 Q. Were you told that there would be any benefit to you for
14 talking to them?

15:38:21 15 A. Tell him that I am not looking for any interest for this.
16 I was a law enforcement agent before I joined NPFL.

17 Q. We're going to come on to you as a law enforcement agent in
18 due course. Were you given to understand by the investigators
19 that there would be any benefit for you of any sort if you were
15:38:56 20 to tell them - if you were to answer their questions or give them
21 information?

22 A. Tell him that what I was told by the investigators was that
23 this is - this is something voluntary, if you want you join. But
24 I was not promised for anything that they will give me something,
15:39:34 25 no.

26 Q. Have you ever had any benefit for giving information to the
27 Special Court investigators?

28 A. Tell him that are you not hearing what I am telling you? I
29 said I am not looking for any interest for this and I was not

1 promised that they were going to give me something if I give
2 evidence.

3 Q. I'm going to ask you the question one more time only. It's
4 a very simple question. Have you ever received any benefit for
15:40:21 5 giving information to the investigators?

6 MR WERNER: Your Honour, I'm sorry to - I object. He
7 answered that question.

8 PRESIDING JUDGE: He didn't actually, Mr Werner. The first
9 question was in the future, were you promised at the time, and
15:40:34 10 this one is have you had any benefit. They are two different
11 questions. I overrule that objection.

12 MR MUNYARD: Your Honour has summarised exactly what I'm
13 trying to deal with now. I will try one more time, if I may:

14 Q. Have you in fact ever received any benefit of any sort for
15:40:56 15 giving information to the Special Court investigators or lawyers?

16 A. Tell him that these people, the investigators, normally
17 when they came to The Gambia what I can say what I have from them
18 was that my fare to go and come used to be refunded because I pay
19 my own fare to see them. Apart from that I had no benefit from
15:41:42 20 them. When I leave they do not send anything to me in The Gambia
21 as benefit.

22 Q. All right. So the position is this: That they have
23 reimbursed your expenses but they have not given you anything
24 else in addition. Is that right?

15:42:12 25 A. Tell him that exactly that is what happened.

26 Q. Now when they came to see you I want to know what exactly
27 was the process that was followed. Were you asked questions by
28 them and then you gave answers or were you simply asked to give
29 your account, your story, of what you saw and heard in Libya and

1 Liberia and any other countries that were relevant? If you want
2 me to put that to you again I will for the sake of clarity.
3 Would you like me to repeat that, Mr Camara?

4 A. That is what?

15:43:05 5 Q. What exactly happened when you met the investigators, did
6 they sit you down and ask you a series of questions to which you
7 gave answers or did they sit you down and say tell us everything
8 you know about Charles Taylor, for example. How did it go?

9 A. Tell him that when these people came to me they told me
15:43:35 10 that what they were asking me was that they asked me about my
11 statement, what I know about Charles and what was I at that time.
12 At the time I gave them my statements, the questions that they
13 had, they asked me and then I reply, I answer their questions.

14 Q. Mr Camara, you have never given a statement as such. You
15:44:22 15 have been interviewed and notes have been made of the interview,
16 but is this right, that you've never been given a written
17 document of what you said that you have then been asked to sign
18 as true? Is that right?

19 A. Tell him that I have never - I never write any paper on my
15:44:51 20 own. They write - instead they write on their own. They talk, I
21 talk and then they write.

22 Q. I'm not suggesting you wrote anything but is this right:
23 That you have never been given their written version of what you
24 told them and asked to check it to make sure that it was correct
15:45:10 25 and then sign it once you're satisfied it's correct? Is that
26 right?

27 A. Tell him yes, when they write my statements they do read my
28 statements for me and ask whether I said it. I tell them yes,
29 yes.

1 Q. So each time they interviewed you did they read back to you
2 their notes of what you had said and got you to confirm that it's
3 correct? Is that what you're telling us?

15:46:15

4 A. I said yes, when they wrote my statements they do read my
5 statements for me.

6 Q. And you confirmed that it was correct at the end of each
7 interview; that's what you seem to be telling us now. Is that
8 correct?

9 A. Tell him yes, I agree.

15:46:39

10 Q. Were any of these interviews tape recorded?

11 A. Tell him that sometimes it could be, but I don't know.

12 Q. As far as you're aware none of them were actually tape
13 recorded; that's what you're saying, isn't it?

15:47:14

14 A. I said it could be they used to record it, but I don't know
15 whether they used to tape me or not. Even they used to tape
16 people with a Walkman. I don't know whether they taped me or
17 not, because I did not see any tape and they told me that they're
18 recording me.

19 Q. And what was the language in which they interviewed you?

15:47:59

20 A. Tell him that I used to speak with these people in English.

21 Q. You told us last week that you were in the Gambian
22 gendarmerie and that you trained for six months as a police
23 officer and I think you said six months as an army officer and
24 then we didn't hear about the remaining four years, but is that
15:48:26 25 correct, that you trained for six months as a police officer and
26 six months as an army officer?

27 A. I said that Gambian gendarmerie used to have one year
28 training. First six months was for army training, the second six
29 months was for police training. If you pass out from that then

1 you became a constable. Being a constable means that you will
2 have to go and carry out your duties, emphasise what you have
3 learnt at the school. I told you that I was a Gambian
4 gendarmerie officer until 1988 when I retired.

15:49:45 5 Q. I think you said 1987?

6 THE INTERPRETER: 1987, your Honours.

7 THE WITNESS: I retired from Gambian gendarmerie in 1987.

8 MR MUNYARD:

9 Q. And in what language was your training in the Gambian
10 gendarmerie?

11 A. Tell him that we are English speaking country. Our
12 official language is English.

13 Q. So although you're being interpreted today and speaking
14 Gambian Mandinka you've done all your professional training in
15 the past in English and you've been interviewed at least seven
16 times by investigators from this Court in English, haven't you?

17 A. Tell him that the reason why is because of today, because
18 you and I cannot speak English. It is your mother tongue, your
19 educational level is higher than mine. I did not read law. I do
20 not want you to tell me something that I cannot answer tomorrow.
21 This is why I want them to speak to me to my mother tongue.

22 Q. It was in no way of a criticism of you. Let me make it
23 plain that what I was trying to establish was that when you were
24 interviewed by the investigators from this Court in English it
25 was a language that you had previously been used to using.

26 That's all. Do you follow?

27 A. Tell him that the English I speak with them, I can speak
28 with them with that English, but your English, you and I cannot
29 understand each other because you speak in terms.

1 Q. One of them was Canadian, I believe. That's Mr Berry. Do
2 you remember Mr Berry? He was one of the first people who
3 interviewed you?

4 A. Tell him yes, I know him.

15:52:35 5 Q. He was a member of the Royal Canadian Mounted Police though
6 I doubt if he wore a very large hat when he was interviewing you.
7 Were you able to understand Mr Berry when he was asking you
8 questions?

9 A. Tell him that Berry, I do understand his English because he
15:52:58 10 used to simplify his English so that I can understand him.

11 Q. Thank you. Another person who was with Mr Berry is called
12 Abraham Haddad. Do you remember him?

13 A. Tell him that I know Abraham also.

14 Q. Were you able to understand his English?

15:53:29 15 A. Tell him yes. Abraham used to speak in a language that I
16 can understand him.

17 Q. Another interviewer was called Christopher Morris. Do you
18 remember him?

19 A. I said I know Christopher Morris.

15:53:57 20 Q. Were you able to understand his English?

21 A. Tell him that at the start of my evidence here if you could
22 remember I told you that I speak even French, but I speak
23 commercial French. Tell him that English, if you lower yourself
24 in English you and I will understand each other, but law English
15:54:52 25 is not something that I learnt so I will not do that.

26 Q. Mr Camara, I'm going to try to avoid any legal English and
27 just stick to plain English, the language I prefer, but I just
28 want to ask you finally about the investigators and the
29 interviews. I don't think you answered my question about

1 Mr Morris. Did you understand his English?

2 A. Tell him yes, I do understand, I hear.

3 Q. Thank you. Finally you were interviewed on two occasions
4 by Mr Morris when also present was Mr Werner who is the lawyer

15:55:41 5 over there who has been asking you questions before me and also
6 Ms Hollis who sits behind him. I'm sure you recognise their
7 faces. Did they at any time speak to you during those interviews
8 and were you able to understand their English if they did?

9 A. Tell him that I understand that, but I want to say

15:56:14 10 something. Was it a force to speak English in this Court. It is
11 my choice that I said I am not going to speak English. I am
12 going to speak my language which will be interpreted to you.

13 Don't you hear what I am saying? Are you not hearing what the
14 interpreter is saying? I think what you are after is to - is

15:56:47 15 just to hear what I am saying.

16 Q. Mr Camara, we completely respect your decision to speak in
17 your mother tongue and we have no difficulty at all with that.

18 May I make it clear to you the reason I've been asking these
19 questions is because I'm going to be asking you and the Court to

15:57:07 20 look at some of the things that were written down after you were
21 interviewed or during the course of your interviews over a period
22 of time in 2006 and 2007. Do you follow?

23 A. I did not hear you. What do you say?

24 Q. We respect your right to speak in your mother tongue and we
15:57:40 25 don't have any problem with that. I've been asking you about

26 your understanding of English because we're going to be looking
27 at the written version of what you said to the investigators when
28 you were interviewed by them. Do you understand?

29 A. Yes, I hear what you are saying.

1 Q. Now after the first time you were interviewed which was in
2 October of 2006 you were interviewed on at least six other
3 occasions. On those other occasions were you ever interviewed
4 because you yourself asked the investigators to come back or was
15:58:35 5 it always because the investigators got back in touch with you
6 and said they wanted to ask you some more questions?

7 A. You know the amount of interview. I don't know how many
8 times I was interviewed. But I don't tell them - I don't tell
9 these people to come and interview me. I do see them come to The
15:59:08 10 Gambia and call me that I should go and answer to them. When I
11 am called to go and answer to them I used to go and answer to
12 them.

13 Q. And were you working - were you in employment in 2006 and
14 2007 on the occasions when you were interviewed by the
15:59:33 15 investigators?

16 A. Tell him up to now I am not working. Since I returned to
17 The Gambia I have not been working.

18 Q. Since you returned to The Gambia in 2003 you've not been
19 working?

15:59:58 20 A. Yes.

21 Q. Final question about the interviews: When you were
22 interviewed you've told us that you were sometimes put to expense
23 in travelling to see the interviewers. Did the interviews ever
24 involve your family having to travel or do anything in connection
16:00:25 25 with you being interviewed?

26 A. Tell him to repeat that. I don't understand that.

27 Q. When you were interviewed did this ever involve your
28 family?

29 A. No.

1 Q. You've told us about your training as a police officer.
2 You presumably were trained in the importance of always telling
3 the truth, particularly when being interviewed by police
4 officers. Is that right?

16:01:18 5 A. Tell him yes, all that I said here is true.

6 Q. And is everything that you've ever said to the
7 investigators true?

8 A. Tell him all that I told investigators, what I know was the
9 truth.

16:01:44 10 Q. By the time you were first interviewed were you aware that
11 Mr Taylor was in the custody of this Court? In prison, in other
12 words, awaiting this trial?

13 A. Tell him I was aware of his arrest.

14 Q. Before your interviews?

16:02:23 15 A. Tell him I said I knew that Taylor was arrested.

16 Q. Now I want to ask you a little bit more about your
17 movements and the beginning part of the evidence that you gave us
18 last week. You told us that you left The Gambia in 1987 and the
19 reason that you left was that you were looking for greener
16:02:50 20 pastures. Do you remember saying that, Mr Camara?

21 A. Tell him yes.

22 Q. Just help us with this, what do you mean by greener
23 pastures?

24 A. Tell him that I was not looking for a place to stay there
16:03:19 25 and looking for a greener pasture. I was looking for something.
26 What lead me for that looking for something, because at that time
27 the government of the day in our country, the poor people were
28 suffering a lot. That was why I went out looking for something.
29 It's not because my family did not have. I was looking, I wanted

1 to have it personally because I did not want to depend on my
2 family.

16:04:29 3 Q. Let me see if I've understood you correctly. You left The
4 Gambia because you didn't want to depend financially on your
5 family. Is that right?

6 A. Yes, that was why I left Gambia.

7 Q. To look to see if you could earn your living independently
8 elsewhere. Is that right?

9 A. Yes, that was why I left.

16:04:47 10 Q. And you were aged 23 at the time, is that right, in 1987?

11 A. Tell him at that time I was more than that age.

12 Q. Mr Camara, maths has never been my strong point but if you
13 were born in 1964 what age do you say you were in 1987?

16:05:42 14 A. Tell him at that time I was in my 24th year when I was
15 leaving The Gambia around the 1987 going towards 1988.

16 Q. You had been working in the gendarmerie for five years,
17 you've told us?

18 A. Yes, I work with Gambian gendarmerie for five years.

16:06:11 19 Q. Did you leave the gendarmerie voluntarily? In other words,
20 you decided to leave rather than that you were told to leave?

21 A. Tell him that I left Gambian gendarmerie voluntarily
22 because I feel that it was a carrier, there was no futures.

23 Q. And where did you first go after you left The Gambia before
24 you ended up in Libya?

16:06:45 25 A. Tell him when I left Gambia at the time I went to Senegal.
26 I was taking a transit. I went to Mali, came - went to Burkina
27 Faso, a village called Bobo-Dioulasso. I went to Togo, Lome.

28 Q. Were you working as you went through these various places?

29 A. Tell him that on this route I was using vehicle or train.

1 Q. But were you looking for work? You told us that you'd left
2 The Gambia because you were looking to become financially
3 independent of your family and that you had resigned from the
4 gendarmerie because there was no career prospects in it. Were
16:07:51 5 you looking for work in these various places that you went to?

6 A. Tell him upon my arrival in Senegal I took a Gabonese visa,
7 central Africa. On my way I was going to Gabon. This was why I
8 went through these countries, because I went by the down route.
9 My intention was to go to Gabon.

16:08:36 10 Q. Did you work in any of these places that you went to after
11 you left The Gambia?

12 A. Tell him that when I left Gambia I paid my fare until I
13 reach Gabon. I spent three months in Gabon. I was deported from
14 Gabon and went to Cameroon. When I arrived in Cameroon I work in
16:09:20 15 a company called RAZEL, a French company. This company used to
16 do road construction. I worked for them as a time keeper. I
17 worked for them for six months. I had some money from them.

18 At that time we used to hear that Libya was a good place.
19 They said people can have money there. So when I had this money
16:10:06 20 in Cameroon, the village I was staying in Cameroon was called
21 Douala, the second capital. Then I returned back to Nigeria,
22 going through Niger.

23 Q. Sorry, did you work in either Niger or Nigeria?

24 A. Tell him when I left Cameroon I did not work at any place
16:10:36 25 except in Libya.

26 Q. Thank you. Well, we can move in that case to Libya. You
27 went to Libya because you'd heard there were good employment
28 opportunities. Is that right?

29 A. Yes, that was why I went to Libya.

1 Q. And was that because of Libya's oil industry?

2 A. Tell him I was not a businessman to know about oil. I am -
3 I only went there to look for a job.

4 Q. But were you looking for a - had you been told that there
16:11:22 5 was a particular kind of work that you might be able to get in
6 Libya or were you just told Libya is a good place to get work?

7 A. Tell him that at that in Libya there were a lot of jobs
8 that one could get. You can get a job and get money. You can go
9 through there to Europe, because at that time to get a visa was
16:12:04 10 not difficult. If you want you can work there and return back to
11 The Gambia because I saw people who were working there and went
12 back to Gambia.

13 Q. So you were heading for Libya for employment opportunities
14 and the possibility of getting into Europe. Is that right?

16:12:31 15 A. Yes, that was why I went there.

16 Q. Thank you. And so tell me if you don't understand the
17 expression, but would you agree therefore that you were an
18 economic migrant; you were moving from country to country for
19 economic reasons. Is that a fair way of putting it?

16:13:05 20 A. Tell him if that is the way you see it, yes, because I was
21 looking for something.

22 Q. Is that the way you see it, Mr Camara?

23 A. Tell him that no, I did not see it that way.

24 Q. How did you see it?

16:13:25 25 A. I see it that I am somebody looking for something to have
26 something for myself.

27 Q. All right. But the main reason was that you didn't want to
28 be financially dependent on anybody else and in particular your
29 family. That's correct, isn't it?

1 A. Yes, that was what I told you.

2 Q. Thank you. Now when you get to Libya what's the first
3 place that you worked in in Libya?

4 A. Tell him that the first place I worked was in the region of
16:14:16 5 Sabah. The name of the company was [indiscernible], a military
6 company.

7 Q. And how long did you work there?

8 A. Tell him that I work four to five months at that place.

9 Q. And how far is Sabah from the Mediterranean coast of Libya,
16:14:52 10 the north coast? I don't mean for you to give us the number of
11 kilometres. Is it close or is it very far?

12 A. Tell him it's very far.

13 Q. Thank you. And so what was it that made you leave there
14 and end up on the coast in Tripoli later in 1989?

16:15:22 15 A. Tell him that the reason why I did that, I heard about
16 Dr Manneh, Kukoi Samba Sanyang, that he was in Libya and also I
17 knew who he was, I knew what he was trying in Libya. The reason
18 why I left my country, go outside to look for something, at that
19 time the government of the day, the difficulties people were
16:16:11 20 facing was why I left the country. I knew that if there was
21 somebody who was trying to - people who was trying to free people
22 from that difficulties then my problems were finished, because
23 it's because of problems that was why I left The Gambia.

24 The - what will free people from those problems in The
16:16:44 25 Gambia, if I see that I should try and stand firm and help that
26 person so that I myself and the other people will have the
27 freedom, because if there is an enjoyment in The Gambia I and the
28 other people will not leave the country. This was why I left
29 Sabah and went to Tripoli.

1 Q. Mr Camara, you didn't leave The Gambia in order to look for
2 Dr Manneh, did you?

3 A. Tell him the time I left Gambia I do not know Dr Manneh's
4 whereabouts. I did not have any information about him.

16:17:35 5 Q. Thank you. You were looking for greener pastures, not
6 Dr Manneh, when you left Gambia. You've told us last week that
7 you heard about Dr Manneh through a man called Alhagi Sai kou
8 Jai teh. Is that right?

9 A. Tell him yes, I said I did not leave Gambia because of
16:18:06 10 Dr Manneh. And also it was Alhagi Sai kou Jai teh who told me that
11 Dr Manneh was in Libya.

12 Q. And it was your father-in-law, you told us, who put you in
13 touch with Alhagi Sai kou Jai teh?

14 A. Tell him that Alhagi Sai kou Jai teh was not my in-law. Tell
16:18:36 15 him that with whom Alhagi Sai kou Jai teh was in the same compound
16 was my in-law.

17 Q. That is what I suggested, but don't worry. Your
18 father-in-law you told us was in the same compound and introduced
19 you to Alhagi Sai kou Jai teh. Is that right?

16:19:14 20 A. Yes.

21 Q. Was your father in law working in Libya like yourself?

22 A. Tell him yes, he was working in Libya in a company. He had
23 been there for a long time because at the time I met him in Libya
24 he had already had three to four years in Libya.

16:19:32 25 Q. Can I just clear this up. Is your father-in-law Gambian
26 also?

27 A. Yes, he was a Gambian.

28 Q. So you end up in the south of Libya first of all working
29 and then you move north. Where was it that your father-in-law

1 introduced you to Alhagi Saikou Jai teh? What part of Libya?

2 A. Tell him that I heard about Alhagi Saikou Jai teh when was
3 in Sabah. After my arrival in Tripoli I met him in the same
4 compound with my in law.

16:20:31 5 Q. Right. And how long after you met him did he introduce you
6 to Dr Manneh?

7 A. That was not more than a week.

8 Q. And how long after you met Dr Manneh did you join SOFA?

9 A. Tell him that before I saw - before I saw Dr Manneh I had
16:21:09 10 already made my decision to join SOFA.

11 Q. How did you hear about SOFA?

12 A. Tell him that I said Alhagi Saikou Jai teh told me the
13 existence of SOFA in Tripoli, but I said I heard that Alhagi
14 Saikou was mobilising. When I was in SOFA at the time I was in
16:21:43 15 Sabah I was told that he used to come there to mobilise Gambians
16 who would join them.

17 Q. At what place did you join SOFA?

18 A. Tell him Tripoli.

19 Q. And it was not until you had joined SOFA that you were able
16:22:11 20 to go to the Mahtaba, was it?

21 A. Tell him yes, because an ordinary people does not go to
22 Mahtaba. Mahtaba is not a place like that.

23 Q. No, Mahtaba is for world revolutionaries only, isn't it,
24 not just ordinary workers in Libya. That's right, isn't it?

16:22:41 25 A. Yes, yes.

26 Q. And that was the reason that you ended up going to Mahtaba,
27 because you had been introduced to Dr Manneh, you joined SOFA and
28 you decided to become a revolutionary in order to overthrow the
29 current Gambian government. That's correct, isn't it?

1 A. Yes, that was why I went to Mahtaba.

2 Q. And that all happened at the end of 1989 or beginning of
3 1990, the turn of the year. That's correct, isn't it?

16:23:36

4 A. No, tell him that - tell him that that was during around
5 end of 1989. That was the time I joined SOFA. Sorry, my speaker
6 is not functioning normally. Okay, okay.

7 Q. So right at the end of 1989 you join SOFA and you go to the
8 Mahtaba for the first time. That's right, isn't it? We can
9 agree on that I think?

16:24:04

10 A. Tell him yes, that not ended completely but around ending.

11 Q. Well, November, December of 1989?

12 A. No, that time I was already in SOFA. I can say that it was
13 around - maybe around June, July, August.

16:24:44

14 Q. Forgive me, Mr Camara, are you now saying that it was
15 around June, July, August that joined SOFA and went to the
16 Mahtaba?

17 A. Yes, but at the time I was joining Mahtaba it was around
18 July, August. Around July, August.

16:25:15

19 Q. Do you have difficulty remembering dates? Nobody will
20 criticise you for not being able to remember a date in 1989, but
21 I want to ask you generally do you have difficulty remembering
22 dates?

23 A. Tell him that when these things were happening I did not
24 record them and it was a long time.

16:25:36

25 Q. We appreciate that, but I think, and I'll be corrected if
26 I'm wrong, I think the evidence you gave us last week was that
27 you didn't join SOFA until the end of 1989. Now you're telling
28 us that you joined it about six months earlier?

29 A. It was around end of July, then after July, in the middle,

1 around the middle of 1989, at the last six months.

2 Q. The last six months?

3 A. We were in that period.

16:26:21

4 Q. And you were intending - in joining SOFA in Libya you were
5 intending training to go back to overthrow the government of The
6 Gambia, weren't you?

7 A. Yes, that was my intention.

8 Q. It was never your intention when you joined SOFA to end up
9 in Liberia, was it?

16:26:46

10 A. No, that was not my intention. My intention was not to go
11 to Liberia.

12 Q. And you had never been involved in the coup attempt of
13 Dr Manneh in 1981 when you were aged just 17, were you?

14 A. No, I was - I did not join that coup d'etat.

16:27:26

15 MR MUNYARD: Madam President, I see the time.

16 PRESIDING JUDGE: If that is a convenient time, Mr Munyard

17 --

18 MR MUNYARD: It is, your Honour.

19 PRESIDING JUDGE: Then in that case will adjourn until

16:27:30

20 tomorrow morning. Mr Witness, I will do as I've done on other
21 afternoons when we adjourn court and remind you that you must not
22 discuss your evidence until all your evidence is finished. Is
23 that understood? Very well, please adjourn the Court until 9.30
24 tomorrow.

16:27:50

25 THE WITNESS: Thank you.

26 [Whereupon the hearing adjourned at 4.30 p.m.

27 to be reconvened on Tuesday, 12 February 2008

28 at 9.30 a.m.]

29

I N D E X

WITNESSES FOR THE PROSECUTION:

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