



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

MONDAY, 18 JANUARY 2010
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Ms Doreen Kiggundu

For the Registry:

Ms Rachel Irura
Ms Zainab Fofanah

For the Prosecution:

Ms Brenda J Hollis
Mr Mohamed A Bangura
Mr Christopher Santora
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Terry Munyard
Mr Silas Chekera

1 Monday, 18 January 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:29:15 5 PRESIDING JUDGE: Good morning. We will take appearances,
6 please.

7 MS HOLLIS: Morning, Madam President, your Honours,
8 opposing counsel. This morning for the Prosecution, Brenda J
9 Hollis, Mohamed A Bangura, Christopher Santora, and we are joined
09:32:14 10 by our case manager, Maja Dimitrova.

11 MR GRIFFITHS: Good morning, Madam President and counsel
12 opposite. For the Defence today is myself, Courtenay Griffiths,
13 and with me Mr Terry Munyard and Mr Silas Chekera of counsel.

14 PRESIDING JUDGE: Thank you. If there is nothing by way of
09:32:38 15 preliminaries, I will remind Mr Taylor.

16 Mr Taylor, I will remind you of your declaration to tell
17 the truth as cross-examination continues.

18 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

19 [On former affirmation]

09:32:54 20 CROSS-EXAMINATION BY MS HOLLIS: [Continued]

21 Q. Good morning, Mr Taylor.

22 A. Good morning.

23 Q. Mr Taylor, since the end of your proceedings on Thursday of
24 last week, have you met with any members of your Defence team?

09:33:08 25 A. Yes, I have.

26 Q. And when have you met with members of your Defence team?

27 A. This morning.

28 Q. And with whom did you meet?

29 A. Lead counsel.

1 Q. And how long did you meet with lead counsel this morning?

2 A. Oh, say about five - five minutes.

3 Q. And last week during the proceedings, which we were only
4 able to move forward with on Monday, on Monday did you meet with

09:33:37 5 any members of your Defence team?

6 A. Yes.

7 Q. And with whom did you meet?

8 A. Lead counsel.

9 Q. And how long did you meet with lead counsel on Monday?

09:33:48 10 A. I would say about five minutes.

11 Q. And on Tuesday and Wednesday, did you have any meetings
12 with any members of your Defence team?

13 A. Yes.

14 Q. On Tuesday?

09:34:00 15 A. Tuesday. On Tuesday I met with - I think with co-counsel
16 Anyah, if I am not mistaken.

17 Q. And on Tuesday how long did you meet with co-counsel Anyah?

18 A. Just a few minutes. I think for the delay - I think it was
19 during the delay, yeah.

09:34:22 20 Q. And other than here at the ICC, did you have any other
21 meetings on Tuesday with any members of your defence team?

22 A. That's Tuesday I am talking about. I say I met with
23 Mr Anyah.

24 Q. And Mr Taylor, other than here at the ICC, on Tuesday did
09:34:38 25 you have any other meetings with members of your defence team?

26 A. By that you're referring at the prison?

27 Q. Yes. And on Wednesday did you have any meetings with
28 members of your Defence team?

29 A. Yes.

1 Q. And who did you meet with on Wednesday?

2 A. Lead counsel. I met with lead counsel. I also met with
3 counsel Anyah and Munyard, I think, on Wednesday for a few
4 minutes.

09:35:14 5 Q. And Mr Taylor, did you meet with all three of these counsel
6 together, or separately?

7 A. Together.

8 Q. And how long did that meeting last?

9 A. A few minutes again after the pronouncement for the
09:35:28 10 suspension of the continuations, yeah.

11 Q. Mr Taylor, on Friday last and over the weekend did you have
12 any meetings with any member of your Defence team?

13 A. No. No.

14 Q. Mr Taylor, you recall as we were concluding our questions
09:35:48 15 and answers on Thursday, we were talking about what you told the
16 outgoing Sierra Leone ambassador in November 1998 to the effect
17 that Liberia was ready to talk with RUF rebels; you recall us
18 talking about that?

19 A. Yes, I do.

09:36:09 20 Q. And, Mr Taylor, in November 1998 when you made those
21 comments to the outgoing ambassador, you didn't acknowledge that
22 you had in fact already been meeting with Sam Bockarie, did you?

23 A. It was not necessary. In diplomacy you do not have to do
24 that. When I told the ambassador - it happens all around. When
09:36:32 25 I told the ambassador that Liberia was ready, it simply meant in
26 diplomatic language that preparations had been made. It happens
27 now when President Obama announced that --

28 Q. Mr Taylor --

29 A. I - no, no, no. I --

1 Q. Mr Taylor --

2 A. I - it's for the benefit of the Court --

3 Q. -- I have asked you a question. It's actually to just
4 cover up why you didn't tell the ambassador about it, isn't that
09:36:54 5 right, Mr Taylor?

6 A. Well, that's why this Court ought to understand that in
7 diplomacy when you make an announcement, it simply means that
8 preparatory work has been done. I've said --

9 Q. Mr Taylor, you didn't tell that ambassador you met with Sam
09:37:06 10 Bockarie in September of 1998, did you?

11 A. It was not necessary.

12 Q. Mr Taylor, does it mean you did not?

13 A. I did not. It was not necessary.

14 Q. And you didn't tell the Sierra Leone ambassador that you
09:37:17 15 met with Sam Bockarie in October 1998, did you?

16 A. It was not necessary. I don't report to ambassadors. I
17 gave a signal for his government. Diplomatically that is proper.
18 It meant that the work had been done. I didn't have to tell him.
19 He was smart enough as a diplomat to know once a President said,
09:37:36 20 "I'm prepared to start this," that means that the preparatory
21 work has been done.

22 Q. And Mr Taylor, in fact you didn't tell the ambassador about
23 these contacts because it had nothing to do with peace, isn't
24 that right?

09:37:47 25 A. That is totally incorrect. I think you lack the
26 understanding of diplomacy. That's why you say that.

27 Q. Instead it had to do with your continued support for the
28 activities of the rebels in Sierra Leone, isn't that correct?

29 A. Counsel, that is - you know, it's incorrect. First the

1 assertion is that I acting without the knowledge of anyone. Now
2 that I am talking to the ambassador, I am acting in my
3 self-interest. That is totally incorrect. I didn't have to tell
4 him in that way. I told him in the way that Presidents normally
09:38:18 5 inform ambassadors.

6 Q. And that way did not include putting him on notice of the
7 meetings you had already had with Sam Bockarie, correct?

8 A. That was not necessary. It was not necessary, I have
9 explained that.

09:38:28 10 Q. Now, Mr Taylor, you in fact didn't tell him about these
11 meetings because, contrary to your testimony to these judges, the
12 meetings were for a purpose other than peace, correct?

13 A. You know, this kind of twisted logic is totally incorrect.

14 Q. Mr Taylor --

09:38:49 15 A. It's twisted. It's incorrect.

16 Q. -- that's correct, is it not?

17 A. It is twistedly incorrect.

18 Q. And Mr Taylor, when you told these judges that these
19 meetings were for the purpose of peace you were lying to them,
09:39:02 20 weren't you?

21 A. That is totally, totally incorrect. I'm not - I was not
22 lying.

23 Q. Just as you lied to them about when you first in fact had
24 personal contact with Mr Bockarie, isn't that correct?

09:39:14 25 A. That is totally incorrect, and this level of twisted
26 thinking will not get anywhere. Because I am on the committee, I
27 don't have to lie to anybody. I am on the committee. We
28 verified - I think we agree I am on the committee, and what I
29 told the ambassador simply meant that there was nothing secret

1 about it. Nothing.

2 Q. Now, Mr Taylor, last Thursday also you were asked if it was
3 correct that atrocities against civilians intensified after the
4 intervention in February 1998. Do you recall being asked about
09:39:48 5 that?

6 A. Yes. I have some recollection of that, yes.

7 Q. And you said you were not following events inside Sierra
8 Leone in that detail; you recall telling the Court that?

9 A. That is correct.

09:39:58 10 Q. But, of course, you did say that there was violence after
11 the intervention. You recall telling the Court that?

12 A. Of course. Not following in the level of details that you
13 asked, yes.

14 Q. Now, that's actually - your comment about not in the level
09:40:16 15 of detail that I am asking about, that's contrary to the prior
16 testimony you have given to this Court, isn't it?

17 A. Ms Hollis, I am not referring - I don't know what prior
18 testimony you are referring to unless you detail it to me. I
19 will answer specifically. And may I just add, speaking about
09:40:36 20 last week, I just want to say to you personally, last week I --

21 PRESIDING JUDGE: Mr Taylor, you can address the Court, the
22 Bench, if you need to.

23 THE WITNESS: Yes. Okay, your Honour. Last week I
24 mistakenly, in a figure of speech, said to Ms Hollis "my dear",
09:40:55 25 and I just wanted to apologise to her. I meant that in no
26 negative way, and I am very sorry about that. It's a figure of
27 speech I use sometimes. I just wanted to mention that.

28 MS HOLLIS:

29 Q. Thank you for that, Mr Taylor. Now, Mr Taylor, would you

1 agree that one of high points of the orgy of violence against the
2 civilians of Sierra Leone began with the intervention that
3 occurred in February 1998?

09:41:28 4 A. I can't make that categorisation, counsel, because, like I
5 say, I am not - there were several - several points of violence
6 in Sierra Leone. I am not prepared to specify one particular
7 point as being greater than others as the intervention occurred
8 in February 1998. There could have been other things that were
9 improper in Sierra Leone. So I - I cannot say with any certainty
09:41:49 10 to this Court that that is the one point. There were other
11 points too.

12 Q. Now, Mr Taylor, you would also agree, would you not, that
13 an horrific campaign was being waged against civilians in Sierra
14 Leone after the intervention?

09:42:07 15 A. Would you repeat that question, please?

16 Q. You would agree that an horrific campaign was being waged
17 against civilians in Sierra Leone after the intervention? You
18 would agree with that, would you not?

19 A. Oh, yes. Oh, yes.

09:42:19 20 Q. And you were well aware of this orgy of violence and these
21 horrific crimes being committed against civilians after the
22 intervention, weren't you?

23 A. Well, the way the question is put I wouldn't - when you say
24 "You were aware", we could get into degrees of awareness. As far
09:42:39 25 as reports are coming out, sometimes you get reports; sometimes
26 you don't.

27 Q. And you were aware of these crimes being committed while
28 Sam Bockarie was in charge of the rebels in Sierra Leone, isn't
29 that is correct?

1 A. Yes, I was aware that crimes were committed while Sam
2 Bockarie was in charge, yes.

3 Q. Now, Mr Taylor, just to see the level of your awareness,
4 let's look at some of your prior testimony in relation to this
09:43:10 5 orgy of violence and these horrific crimes after the
6 intervention. So if I could draw your attention first to the
7 transcript of 30 July 2009 at page 25602. Now, Mr Taylor, if we
8 look at line 15 - can you see that line, Mr Taylor? Beginning on
9 line 15 there is a question from your Defence counsel.

09:44:03 10 A. Yes.

11 Q. And he is asking for your help:

12 "We know from the Prosecution's opening and from the dates
13 listed in their indictment that the high point of the orgy of
14 violence which afflicted Sierra Leone began with the ECOMOG
09:44:18 15 intervention in February of 1998 which lasted through until
16 January 1999."

17 And then he asked you if you had anything to gain by any
18 involvement in that and you answer at line 26, "Absolutely
19 nothing. Everything to lose."

09:44:35 20 Now, Mr Taylor, you didn't take exception to the language
21 used by your Defence counsel about this high point of the orgy of
22 violence, did you, Mr Taylor?

23 A. No, I didn't.

24 Q. And you didn't profess to be unaware of the details, did
09:44:49 25 you, Mr Taylor?

26 A. That was not his question.

27 Q. Mr Taylor, you didn't profess to be unaware of the details
28 of that orgy of violence, did you?

29 A. That was not the question to me, so I didn't profess to it.

1 Q. Mr Taylor, you did not profess that, did you?

2 A. I answered his question.

3 Q. Actually you didn't. You didn't.

4 PRESIDING JUDGE: Yes, I think the witness did answer, gave
09:45:09 5 you more than what you asked for, but we can move on.

6 MS HOLLIS: He answered, "It wasn't the question",
7 Madam President.

8 PRESIDING JUDGE: He also said he didn't because it wasn't
9 the question. As far as I am concerned the question is asked and
09:45:26 10 answered.

11 MS HOLLIS: I will move on then, Madam President:

12 Q. Let's also look at 3 August 2009, page 25800. Mr Taylor,
13 you have this page before you?

14 A. Yes, I do.

09:46:10 15 Q. And do you see there is an answer beginning at line 1 and
16 you are talking about a document and then there is a question
17 which draws your attention to the part of the document that talks
18 about 1 July 1998 that begins at line 7 and it talks about a
19 meeting between yourself and President Kabbah of Sierra Leone.
09:46:35 20 Do you see that? That's line 7 to 12. Do you see that?

21 A. Just a minute, counsel. I am trying to read it to be sure.
22 Yes, I do.

23 Q. And then if we move down to line 21:

24 "The Heads of State of Sierra Leone and Liberia" - move to
09:46:59 25 23 - "reached agreement on the following points: Strongly
26 condemn the continuing rebel activities in Sierra Leone, as well
27 as the horrendous atrocities that had been committed there."

28 So you had sufficient knowledge of the details of the
29 atrocities to condemn them in July 1998, correct?

1 A. Incorrect.

2 Q. Well, it said you reached agreements on the following
3 points: "Strongly condemn the continuing rebel activities in
4 Sierra Leone, as well as the horrendous atrocities that had been
09:47:38 5 committed there."

6 A. Well, your Honours, if I may just mention here, Kofi Annan,
7 Abdul salami Abubakar, the Secretary-General of the United Nations
8 at that time - Abdul salami Abubakar, Tejan Kabbah and I met. At
9 the end of these meetings there is a communique and the
09:47:57 10 communique states that I condemn this, I condemn this, I condemn
11 that. It has nothing to do with knowledge, detailed knowledge,
12 of what is going on. These are communiqes. This is a
13 diplomatic conclusion to a meeting without having to know the
14 intricate details. So, I'm sorry, I did not know.

09:48:14 15 Q. Mr Taylor, the question was you had knowledge of sufficient
16 details to be able to condemn these horrendous atrocities, isn't
17 that correct?

18 A. Well, based on this, yes, you have some knowledge, but not
19 the intricate details, yes.

09:48:31 20 Q. And then if we look at line 27 where your counsel says,
21 "Let's pause there. Let us remind ourselves this is a meeting
22 taking place after the ECOMOG intervention in February" and then
23 if we go to the next page, please, page 25801, and if we look at
24 line 2, "And everyone will recall that thereafter those kicked
09:49:05 25 out of Freetown embarked upon an orgy of violence throughout the
26 country of Sierra Leone, yes?" And you answer, "Yes."

27 A. Yes.

28 Q. And then the question: "And were you keeping abreast of
29 that situation from your embattled position in Liberia?" And

1 your answer starting at line 8, "Yes."

2 And you indicate that following the situation in February
3 the Committee of Five is seized of this matter in Sierra Leone
4 and you remind the Court:

09:49:42 5 "June, just at the beginning of June, just before this
6 meeting, what do we have? We have the special representative of
7 the Secretary-General in Sierra Leone writing a letter to the
8 Security Council, informing them that Liberians are
9 involved - that most of the people supporting the junta are
09:50:04 10 Liberians."

11 And so let's move now to line 24:

12 "So, yes, we are following the situation in Sierra Leone,
13 okay, because of this level of accusation that is coming, which
14 is not coming from ECOWAS but it's coming directly from UN
09:50:24 15 headquarters."

16 So here on 3 August you told your counsel, after your
17 counsel recalls this orgy of violence after the people were
18 kicked out of Freetown and asked you were you keeping abreast of
19 that situation and you indicate that, yes, indeed you were
09:50:47 20 keeping abreast of that situation. Correct, Mr Taylor?

21 A. Yes, that is correct. I am keeping abreast of the
22 situation. Based on what we have read, we are seeing the
23 accusations, we have seen all of these, of course we are now on
24 alert in trying to deal with the situation, yes. So we do keep
09:51:06 25 abreast of the situation, yeah.

26 Q. Then if we could also look at 8 September 2009, beginning
27 at page 28273. I believe you have that page before you, yes,
28 Mr Taylor?

29 A. Yes, I have the page.

1 Q. You are talking at line 3 about a statement in May you
2 thought of 1998, 1999, from the State Department that was stated
3 by James Rubin. And then Defence counsel draws everyone's
4 attention to the document behind divider 7 in the material
09:52:11 5 disclosed for week 34 and identifies the document as a US
6 Department of State, Office of the Spokesman statement issued on
7 12 May 1998. And you indicate that you first became aware of
8 that item after your incarceration because it was among the
9 documents assembled by your team since you have been held by the
09:52:39 10 Court. Do you see that information on that page, Mr Taylor?

11 A. Yes.

12 Q. And then your counsel goes through this document, this May
13 12, 1998 statement by James P Rubin and that document later is
14 marked for identification as MFI-235 and that is done at page
09:53:02 15 28280.

16 Now, Mr Taylor, if we could turn to the next page, 28274.
17 Your counsel is reading from the document, the document is Rebel
18 Atrocities Against Civilians, and it begins on the last page of
19 28273:

09:53:29 20 "The violence being wrecked on the civilian population of
21 Sierra Leone" - we are now at page 28274 - "by the Revolutionary
22 United Front and the deposed military junta. Our ambassador in
23 Freetown and State Department officials have visited survivors
24 and heard stories of entire villages being slaughtered or
09:53:52 25 mutilated by rebel forces."

26 It indicates that the RUF calls the campaign Operation No
27 Living Thing and it goes on to talk about hundreds of people
28 being treated in hospitals after rebels chopped their arms, legs
29 and ears with machetes, thousands died before they were able to

1 reach medical help, many women and children have been raped. And
2 then it indicates at line 12:

3 "The United States strongly condemns the rebels' horrific
4 actions and urges rebel leadership to order an immediate end to
09:54:32 5 the senseless slaughter, mutilation and torture of the rural
6 civilian population in Sierra Leone."

7 Then if we look at line 23:

8 "Now, first of all, the date, May. At that time,
9 Mr Taylor, were you aware that there was this horrific campaign
09:54:49 10 being waged against the civilian population in Sierra Leone?"

11 You say at line 26: "May of 1998, yes, there were news
12 reports of that, yes."

13 Now, if we could move to the next page, please, page 28275.

14 Now, Mr Taylor, if we look at the question that your counsel is
09:55:33 15 posing to you beginning at line 23, and he is asking you what
16 advantage you could gain by terrorising the population of Sierra
17 Leone as that population clearly were being terrorised in May
18 1998 and asked what you had to gain and you say you had nothing
19 to gain. Now, Mr Taylor, you didn't contest your Defence
09:56:02 20 counsel's statement that the population of Sierra Leone were
21 clearly being terrorised in May 1998, did you, Mr Taylor?

22 A. No, I didn't, and nobody could.

23 Q. And if we can look at page 28276. This is following on to
24 this discussion about atrocities being committed in - as of May
09:56:34 25 1998 and the terrorisation of the Sierra Leone civilian
26 population as of that time. If we look at line 5:

27 "Q. We appreciate from the evidence, Mr Taylor, and we
28 have never challenged this fact that gross atrocities were
29 committed during that period. Is that right? Do you

1 accept that?

2 A. Oh, we accept that and we condemned it even at that
3 time. We accept that.

4 And then you put at line 11, "We condemned it. It was
09:57:12 5 unconscionable, we said."

6 So, Mr Taylor, you had sufficient knowledge of the details
7 of the atrocities being committed against civilians in Sierra
8 Leone as of May 1998 to condemn those atrocities. Isn't that
9 correct?

09:57:30 10 A. Well, we had knowledge. Sufficient is relative. We had
11 knowledge. We condemned it. We've never, never said that
12 terrible things did not happen in Sierra Leone, counsel. What I
13 have said is that I was not associated with, neither did I order,
14 neither was I in command or control of it.

09:57:50 15 Q. Mr Taylor, we are talking about your knowledge of the
16 details of the atrocities and, Mr Taylor, you had sufficient
17 knowledge of the atrocities being committed after the
18 intervention and as of May 1998 to indicate that this conduct was
19 unconscionable, didn't you?

09:58:11 20 A. We had knowledge. I question I was disagree with
21 "sufficiency", but I had knowledge - everyone had knowledge of
22 the fact from reports that there were atrocities. Everyone. I
23 am not in Afghanistan, but I know that there are atrocities. So
24 there was knowledge. "Sufficiency", I do have a problem with
09:58:31 25 that.

26 JUDGE DOHERTY: Ms Hollis, Mr Taylor has used the term "We
27 condemned it. We had knowledge". Now, are we talking about
28 personal or this committee when there is a reference to "we"?

29 THE WITNESS: I am talking about - I think the question,

1 your Honour, in regards to - the Government of Liberia I am
2 referring to as "we", and even the committee could have. But I
3 am speaking about the Government of Liberia.

4 MS HOLLIS:

09:58:58 5 Q. And when you say the "Government of Liberia" you are
6 including yourself, are you not, Mr Taylor?

7 A. That's what I mean by "we", yes. Yes, counsel.

8 Q. Now, Mr Taylor, in relation to your role as the point
9 President for peace, it is notable, is it not, that during the
09:59:19 10 time you were being accused of supporting the rebels in Sierra
11 Leone, you never took the opportunity to remind everyone that you
12 had been chosen as the point person for peace, isn't that
13 correct?

14 A. When you say remind anyone, who was I to remind? Who are
09:59:40 15 you referring to?

16 Q. Well, Mr Taylor, did you remind anyone in your public
17 pronouncements that you had been chosen as the point President
18 for peace for Sierra Leone?

19 A. But I didn't have to remind anybody. Everybody knew. All
09:59:53 20 the Presidents were aware. My government, the ECOWAS were aware.
21 The United Nations was aware, as they were all dealing with me.
22 So there was no one to remind again.

23 Q. Now, Mr Taylor, your government issued denials of
24 supporting the rebels on several occasions from 1998 through the
10:00:12 25 Freetown invasion, isn't that correct?

26 A. Oh, definitely we did issue denials, yes.

27 Q. And in those denials of supporting the AFRC/RUF, you never
28 pointed out to members of the international community that you
29 indeed had been chosen to be the point President for peace in

1 Sierra Leone. You never pointed that out, did you?

2 A. Why was it necessary to point it out? No, everyone knew.
3 The United Nations is dealing with me, all the governments, the
4 OAU, ECOWAS, all my colleagues, so who is there to remind? No,
10:00:56 5 counsel, there's - except we're talking about a repetitious act:
6 Remember you sent me? Remember? That was not necessary, so I
7 didn't.

8 Q. And Mr Taylor, even in September 1998 when you told the
9 French government that your government abstained from any kind of
10:01:19 10 interference in the affairs of its neighbouring states, correct?

11 A. That is correct.

12 Q. And when you told the French government that you abstained
13 from any kind of interference in the affairs of its neighbouring
14 states, you never pointed out that any contacts you had with the
10:01:36 15 rebels was because you were the point President for peace. You
16 never pointed that out, did you, Mr Taylor?

17 A. Well, that's a catchword there, counsel. Interference in
18 the affairs of another state was what I was dealing with with the
19 French government, and in diplomacy when you talk about
10:01:53 20 interference, if the French government had asked me specifically
21 about my role I would have told them. Interference had got
22 nothing to do with just only dealing with an issue of conflict.

23 Q. Mr Taylor, that's not the question.

24 A. Well, that's my answer.

10:02:06 25 Q. You never told the French government at this time that any
26 contacts you may have had with the rebels in Sierra Leone was
27 because you were the point President for peace. You never told
28 them that, did you?

29 A. I didn't have to. They didn't ask me about it. They

1 should have known.

2 Q. And in fact, Mr Taylor, you never told them you were having
3 contacts with rebels in Sierra Leone, did you, Mr Taylor?

10:02:30

4 A. But I was not working for the French government, so I
5 didn't have tell them. Based on the - you don't have the full
6 conversation. The questions that were raised in private meetings
7 with the French government were answered. Now, you don't have
8 full copies of that conversation, neither do I have it now. But
9 when we talk about the interference in the affairs of states, I
10 was dealing with that particular question, counsel.

10:02:47

11 Q. Mr Taylor, you never told the French government at that
12 time about any meeting with Sam Bockarie, did you?

13 A. No, it was not their business. They didn't ask me.

10:03:06

14 Q. And you didn't express any sort of outrage that no one
15 seemed to appreciate that you were acting as the point President
16 for peace, did you?

17 A. No. But your Honours, we have to look at what was going
18 on. During my visit to France in 1998 --

19 Q. Mr Taylor, first of all, that wasn't the question.

10:03:25

20 A. What was your question then?

21 Q. The question was that you didn't express any sort of
22 outrage that no one seemed to appreciate you were acting as the
23 point President for peace, did you?

24 A. Well, that's what you have to know. The point here
25 being the French government --

10:03:41

26 Q. First of all, did you express that outrage, Mr Taylor?

27 A. Well, you are not going to cut me off except the judges ask
28 me to stop.

29 Q. Mr Taylor, did you express that outrage?

1 PRESIDING JUDGE: I think we'll keep it simple. Please
2 answer that question.

3 THE WITNESS: There are two governments - at the time, your
4 Honours, 1998 --

10:04:01

5 MS HOLLIS:

6 Q. Mr Taylor --

7 A. -- the French government is divided --

8 Q. -- did you express outrage?

10:04:08

9 A. Well, the minister that I dealt with I did not express
10 outrage, but the President I did.

11 Q. Where can we find that expression of outrage, Mr Taylor?

12 A. Oh, well, that's for you to. That's what I am saying,
13 there were two - there were - you had two administrations in
14 France at the time; the Conservative was leading, okay? It was
15 Mr, I think, Jospin that was Prime Minister, and the President of
16 France was Mr Chirac. You had co-habitation in France. So my
17 meetings with the government was different from my meeting with
18 the President.

10:04:40

19 Q. And Mr Taylor, where can we find this expression of outrage
20 that you made to the President of France?

21 A. You asked me a question. Well, I say I did, so you have to
22 prove me wrong.

23 Q. And where can we find that, Mr Taylor?

24 A. You have to ask the French for the records.

10:04:50

25 Q. You don't have any notes of that meeting that expressed
26 your outrage, Mr Taylor?

27 A. No, I did not take any notes in that meeting, Ms Hollis.

28 Q. That's because you didn't express such outrage, isn't that
29 correct, Mr Taylor?

1 A. That is incorrect.

2 Q. Now, Mr Taylor, you do recall that on 15 October 1998,
3 President - or as of that date, President Kabbah had submitted a
4 formal complaint to the United Nations alleging that the Liberian
10:05:20 5 government had massed 5,000 troops along the Liberia-Sierra Leone
6 border. You do recall that complaint that President Kabbah had
7 submitted, do you not, Mr Taylor?

8 A. Yes, I do.

9 Q. And the representative of the Secretary-General for
10:05:38 10 Liberia, Felix Downes-Thomas, had indicated that he considered
11 the allegation so serious, he had travelled to Ganta, Liberia, to
12 confront you with the accusation; do you recall him doing that?

13 A. Yes.

14 Q. And he indicated he did this because he could not wait
10:05:57 15 until you returned to Monrovia, and the Liberian government
16 responded, after being made aware of this allegation, calling the
17 allegations unfortunate and irresponsible. Do you recall that
18 response on behalf of the Liberian government?

19 A. That is correct.

10:06:18 20 Q. And in fact, your Information Minister, Joe Mulbah, stated
21 that the Liberian government is angry. The allegations have no
22 element of truth. At this moment when Liberia is at peace, who
23 needs war in the region? Do you remember your Minister of
24 Information making that statement?

10:06:47 25 A. That is correct.

26 Q. Now, Mr Taylor, your government did not take this occasion
27 to point out to anyone that whatever actions you were taking was
28 because you were the point President for peace, isn't that
29 correct?

1 A. Well, that is totally incorrect. And you see, what you
2 have just done before these judges, you have not given them the
3 facts. You failed to mention in that piece that the very Felix
4 Downes-Thomas, the United Nations military forces in Liberia
10:07:19 5 proceeded to the border immediately and announced that it was not
6 true and the Secretary-General reported.

7 Q. Mr Taylor, you are not answering the question I have asked
8 you. Mr Taylor, your government did not take this occasion to
9 point out to anyone that whatever actions you were taking was
10:07:38 10 being done because you were the point President for peace, isn't
11 that correct?

12 A. No, I cannot answer that question. Because when you say
13 action that was taken, it meant that troops had been deployed and
14 in fact troops had not been deployed. So my answer to you is
10:07:52 15 that you have incorrectly stated the evidence, so your question
16 is one of deceit. So I cannot answer that question.

17 PRESIDING JUDGE: Mr Taylor, that is not true. That is not
18 true. The question asked by the Prosecution is:

19 "Your government did not take this occasion to point out to
10:08:10 20 anyone that whatever actions you were taking was because you were
21 point President for peace, isn't that correct?"

22 Now, that is a simple question.

23 THE WITNESS: Yeah, but what action, your Honour? What
24 action are you referring to, counsel? What action?

10:08:26 25 MS HOLLIS:

26 Q. Mr Taylor, I said a very wide question, yes, and that is
27 whatever actions you were taking were being done because you were
28 the point President for peace?

29 A. You see, at the core of the question again, your Honour, is

1 the accusation of 5,000 troops. That's the action. There are no
2 troops, so I have to say no to this answer. Because at the core
3 of the question is the action of troops being deployed, which was
4 not the case.

10:08:59 5 Q. So, Mr Taylor, you didn't take this occasion to point out
6 that these people were talking to the - and accusing the point
7 President for peace in Sierra Leone, did you?

8 A. No, I did not inform anybody because it was not necessary.

9 Q. Now, Mr Taylor, if we could please, for a moment, look at
10:09:31 10 what you said about your activities in MFI-28. Those are the -
11 that's the presidential papers. We are going to be looking at
12 that portion of MFI-28 beginning with page 292. This is
13 entitled, "Policy statement by the Government of the Republic of
14 Liberia on allegations against Liberia for involvement in the
10:10:34 15 Sierra Leone crisis, Monrovia, Liberia, December 29, 1998", and
16 then it begins "Policy Statement". Do you recall this policy
17 statement being issued, Mr Taylor?

18 A. Oh, yes, I do.

19 Q. And if we look at the beginning of this policy statement,
10:10:55 20 so the beginning paragraphs in the column on the left on the
21 page:

22 "The Government of Liberia views with disappointment and
23 indignation suggestions and allegations by the Government of
24 Sierra Leone that Liberia is supporting former junta/RUF forces
10:11:16 25 in Sierra Leone.

26 The Government of Liberia reiterates unequivocally that it
27 is not supporting in any form the forces of the AFRC or RUF in
28 Sierra Leone."

29 And then if we look down at the next paragraph:

1 "The government categorically denies and takes exception to
2 these unfounded allegations by the Government of Sierra Leone and
3 the ECOMOG high command at the current Committee of Five meeting
4 on Sierra Leone in Abidjan, Ivoire, and demands
10:11:57 5 concrete proof of these allegations."

6 Now, Mr Taylor, you did not make a point here that you had
7 been chosen as the point President for peace, did you, Mr Taylor?
8 A. That's not what I - no, I didn't point it out in this
9 statement, no.

10:12:16 10 Q. And if we could please look at the next page, page 293. If
11 we could look to the bottom of that page, please. We see we're
12 at page 293 and the left column, the last paragraph of the policy
13 statement, and then it's followed by a number 10, it appears:

14 "The Government of Liberia has demonstrated a great deal of
10:13:05 15 patience and employed the highest form of diplomacy in the face
16 of these unwarranted accusations through the following actions
17 and activities:

18 Maintained an open line of contact and direct dialogue with
19 President Ahmad Tejan Kabbah aimed at building confidence between
10:13:28 20 Liberia and Sierra Leone?

21 Dispatched at least four high level presidential
22 delegations to Freetown to hold talks with President Kabbah and
23 Sierra Leone officials within the past year.

24 Hosted President Kabbah in Monrovia for a one-day summit,
10:13:49 25 with US President Bill Clinton's special envoy for Africa,
26 Reverend Jesse Jackson, in attendance.

27 President Taylor visited Conakry, Guinea twice in the past
28 six months and on both occasions held a one-day summit with
29 Presidents Tejan Kabbah and Lansana Conte. At the second summit

1 Last November, Reverend Jesse Jackson was again in attendance."

2 Now, Mr Taylor, when you listed all of the efforts that you
3 had taken, you did not list any of your meetings with Sam
4 Bockarie, did you?

10:14:32 5 A. No. Who is Sam Bockarie? No.

6 Q. You didn't list your September meeting with Sam Bockarie?

7 A. Of course not.

8 Q. You didn't list your October meeting with Sam Bockarie?

9 A. No.

10:14:44 10 Q. You didn't list that you had facilitated Sam Bockarie's
11 travel to Burkina Faso and then back to Sierra Leone?

12 A. No, it's not necessary. I didn't mention it, no.

13 Q. You didn't mention any of that in this --

14 A. The Government of Liberia had no need, no.

10:15:02 15 Q. Mr Taylor, you didn't mention any of that in this policy
16 statement?

17 A. The Government of Liberia had no need to mention a meeting
18 with Sam Bockarie. The government did not.

19 Q. Mr Taylor, this policy statement is dated 29 December 1998,
10:15:15 20 correct?

21 A. That is correct.

22 Q. And by this time, by your own admission, you had had three
23 meetings with Sam Bockarie?

24 A. Definitely, yes.

10:15:24 25 Q. And, according to you, they were all for purposes of peace?

26 A. Definitely.

27 Q. But none of those you saw the need to mention in this
28 policy statement?

29 MR GRIFFITHS: Madam President, in light of the context of

1 this line of questioning, in our submission it would only be fair
2 for my learned friend before she concludes this topic to go to
3 the next page of the statement where it clearly states, last
4 paragraph on the left, "Liberia is cognisant of the role it is
10:15:54 5 called upon to play," and continues, the last paragraph,
6 "Meanwhile the Committee of Five on Sierra Leone has mandated
7 inter alia Liberia." So it puts the questions being asked in
8 some kind of context.

9 MS HOLLIS: May I respond?

10 PRESIDING JUDGE: Yes, Ms Hollis.

11 MS HOLLIS: First of all, Defence counsel is simply making
12 argument to you to try to defuse some of the questions that have
13 been asked and it is certainly something he could have pointed
14 out in redirect. The question I was asking was about whether
10:16:33 15 Mr Taylor had indicated here not that he had a mandated role as
16 being a member of the Committee of Five, but indeed his role, as
17 he has called it, the point President for peace. He did not
18 point that out. Secondly, and most importantly, that in this
19 listing of all the things he had done, never once does he mention
10:16:56 20 these meetings with Sam Bockarie that, according to what he has
21 told your Honours, were all for the purpose of peace. So that
22 was the context in which those questions were asked.

23 PRESIDING JUDGE: Ms Hollis, I think you may continue and
24 any issues for clarification Defence counsel can and may handle
10:17:16 25 in re-exam.

26 MS HOLLIS: Thank you, Madam President:

27 Q. Now, Mr Taylor, if we move to February 1999, you again
28 denounced accusations that you were supporting the AFRC/RUF
29 rebels in Sierra Leone. Do you recall that?

1 A. Yes, I do.

2 Q. And indeed you indicated that you deplored the assertions.

3 Do you remember that, Mr Taylor?

4 A. Yes.

10:18:02 5 Q. And that, "The assertions were intended to portray us as
6 evil to encourage any party to bring havoc to our resurgent
7 climate." Do you recall that?

8 A. Yes.

9 Q. And when you say, "Were intended to portray us as evil,"
10:18:19 10 who is the "us" you are talking about?

11 A. The Government of Liberia.

12 Q. And that includes you, correct, Mr Taylor?

13 A. That is correct.

14 Q. Now, this was in an Armed Forces Day message that was read
10:18:31 15 out by your Defence Minister, Daniel Chea, correct?

16 A. That is correct.

17 Q. And you indicated that, "We perceive it to be part of an
18 international ploy to draw outside forces into any cross-border
19 conflict with this nation," correct? That was part of the
10:18:54 20 remarks you had to make in February 1999, correct?

21 A. I am taking your word for this. I am not looking at the
22 full statement, but I assume that it's correct.

23 Q. Well, perhaps we could look at what we have, which is
24 admittedly from a Sierra Leone news archive. If we could look at
10:19:13 25 number 11 in annex 2B. This is tab number 11 in annex 2B.

26 PRESIDING JUDGE: Just hold on, please, until we find our
27 references. Sorry we have the wrong files. This file begins at
28 tab 15.

29 MS HOLLIS: To assist your Honours, the binder has two tabs

1 which are annex A and then annex B begins.

2 PRESIDING JUDGE: I think we can proceed and we will share
3 what we have.

4 MS HOLLIS: Thank you, Madam President:

10:21:43 5 Q. Mr Taylor, you have this before you. If you could move it
6 down a bit so we can see the very top of this page, please,
7 initially and we see, "Sierra Leone Web - Sierra Leone News -
8 February 1999, page 1 of 2". And we see, Mr Taylor, the date 12
9 February. Do you see that?

10:22:03 10 A. Well, I see the date of the Sierra Leone news publication.

11 Q. As 12 February, you see that, Mr Taylor?

12 A. That is correct, I see the date.

13 Q. Then if we could look at the second paragraph, please:

14 "Liberian President Charles Taylor on Thursday again
10:22:19 15 denounced accusations that his government is supporting AFRC/RUF
16 rebels in Sierra Leone. 'We deplore these assertions which are
17 intended to portray us as evil, to encourage any party to bring
18 havoc to our resurgent climate,' Taylor said in an Armed Forces
19 Day message read out by Defence Minister Daniel. 'We perceive it
10:22:58 20 to be part of an international ploy to draw outside forces into
21 any cross-border conflict with this nation.'"

22 Do you recall that Armed Forces Day message, Mr Taylor?

23 A. I do have a problem here, counsel.

24 Q. Okay.

10:23:17 25 A. I do have a problem here. I do recall an Armed Forces Day
26 message. It would have been good for me to have the benefit of
27 seeing that message. I am being quoted here by a Sierra Leonean
28 web as having said that. I recall - I don't remember the details
29 of the message and, quite frankly, I want to say to this Court I

1 cannot say with certainty that this news report quotes me
2 properly. So I have a problem with not seeing the message that I
3 was supposed to give on that particular day. So I could be
4 answering yes and maybe some part of it could be wrong, so I'm in
10:23:58 5 a bind here.

6 Q. Okay. Well, let's go back to your prior answers just a few
7 moments ago, Mr Taylor, and perhaps we can find out where the
8 problems lies. On my LiveNote it would begin with line 25 of
9 page 29 with a question:

10:24:22 10 "Q. Now, Mr Taylor, if we move to November 1999, you again
11 denounced accusations that you were supporting the AFRC/RUF
12 rebels in Sierra Leone. Do you recall that?

13 A. Yes, I do."

14 So you do recall in February 1999 denouncing accusations
10:24:44 15 you were supporting the AFRC/RUF rebels in Sierra Leone, correct?

16 A. That is correct.

17 Q. "Q. And indeed you indicated you deplored the assertions.
18 Do you remember that, Mr Taylor?

19 A. Yes."

10:24:55 20 So indeed you do recall that, correct?

21 A. Yes.

22 Q. "Q. And that, 'The assertions were intended to portray us
23 as evil to encourage any party to bring havoc to our
24 resurgent climate,' do you recall that?

10:25:13 25 A. Yes."

26 So indeed you recall that portion, yes, Mr Taylor?

27 A. That's the problem that I'm raising right now. The problem
28 is I am saying yes to you --

29 Q. Mr Taylor, you recall that portion, yes, Mr Taylor?

1 A. That's the problem I am having with the statement that as
2 is reported. I recall giving a statement --

3 Q. Mr Taylor --

4 A. -- but I do not recall the details.

10:25:33 5 Q. Mr Taylor --

6 PRESIDING JUDGE: Ms Hollis, what would help is if you
7 wouldn't speak over each other. I think the question was, "Do
8 you recall" and the witness is trying to explain that he doesn't
9 recall and why he doesn't recall.

10:25:49 10 MS HOLLIS: Actually, Madam President, I am reading from
11 the transcript and on my transcript it is page 30, line 7, and
12 the question asked of this witness, just moments ago, "And that,
13 'The assertions were intended to portray us as evil to encourage
14 any party to bring havoc to our resurgent climate,' do you recall
10:26:16 15 that?" And just moments ago Mr Taylor said, yes, he did recall
16 that:

17 Q. So you recall that portion of the February 1999 message,
18 yes, Mr Taylor?

19 A. I don't know what else you want me to say again. I don't
10:26:35 20 know what you really want me to say.

21 Q. Well, are you changing your testimony?

22 A. I am not changing my testimony.

23 Q. All right. So you do recall that portion?

24 A. You asked me a question. I am recalling a statement that I
10:26:44 25 made. Now, the details of that statement --

26 Q. Mr Taylor --

27 A. -- as is reported --

28 Q. Mr Taylor --

29 A. So you want to stop me again?

1 Q. Mr Taylor, here is the question you were asked.

2 PRESIDING JUDGE: Ms Hollis, we are wasting a lot of time
3 arguing back and forth. The witness's answer is he doesn't
4 remember the details. He remembers that he condemned the aspect
10:27:06 5 you are referring to, the bit about the international ploy,
6 et cetera, but he doesn't remember the details of the quotation.
7 Now, beyond that I think we can move on.

8 MS HOLLIS: I will move on, Madam President, but we are
9 simply going over what this witness told you just moments ago,
10:27:24 10 which he is now professing not to remember when a few moments ago
11 he said he did and so that is what --

12 PRESIDING JUDGE: We can now read the transcript of a few
13 moments ago. The transcript speaks for itself. I am looking at
14 my transcript, page 30, line 18, where you ask him: "And you
10:27:48 15 indicated that, 'We perceive it to be part of an international
16 ploy to draw outside forces into any cross-border conflict with
17 this nation', correct? That was part of the remarks you had to
18 make in February 1999, correct?" And he answers, "I am taking
19 your word for it. I am not looking at the full text of the
10:28:11 20 statement, but I assume that it's correct." And then the
21 statement you draw to him is this one now in tab 11, which is a
22 quotation in a newspaper, and he is refuting that, saying he
23 would rather look at the statement that he made, not a quotation
24 in a newspaper. Now, surely for me that is so clear, that we can
10:28:36 25 move on. The evidence speaks for itself.

26 MS HOLLIS: Well, we certainly will move on,
27 Madam President. But it is our position that when he makes such
28 a statement, we can go back to what moments before he said he
29 recollected, and that is what we were doing. Now we will

1 certainly will move on, but we believe that what we were doing is
2 perfectly within the scope of cross-examination.

3 PRESIDING JUDGE: I am not saying that it wasn't. I am
4 trying, as Presiding Judge, to see that we remove the impasse
10:29:07 5 that we hit every now and then, to move on. That's my duty, I
6 think.

7 MS HOLLIS: We will move on, Madam President.

8 We would ask that this page, "Sierra Leone Web - Sierra
9 Leone News - February 1999, 12 February, page 1 of 2", be marked
10:29:30 10 for identification.

11 PRESIDING JUDGE: [Microphone not activated]. It is marked
12 MFI-334.

13 MS HOLLIS: And Madam President, we will be referring to
14 other portions of the Sierra Leone Web, and we would ask if we
10:30:04 15 might be able to mark those as we go along as one cumulative
16 exhibit under MFI-334? If this would become A?

17 PRESIDING JUDGE: That being the case, I will amend the
18 numbering to MFI-334A.

19 MS HOLLIS: Thank you, Madam President:

10:30:29 20 Q. Now, Mr Taylor, just one more point on this. You have
21 indicated you recollect some of what you said or put out in
22 February 1999 and the statements you made at that time that we
23 have covered. Nowhere in those statements do you remind people
24 that you are acting as the point President for peace, do you?

10:30:58 25 A. So far as the statements that I have seen, no.

26 Q. Mr Taylor, you made no mention during this time of your
27 role as point President for peace because that is simply a
28 version of events that you have concocted for this Trial Chamber;
29 isn't that correct?

1 A. That is not correct.

2 Q. Now, Mr Taylor, it's correct, is it not, that in late
3 December 1998, the President of Gambia, President Jammeh,
4 repeated his offer to mediate between the Sierra Leone government
10:31:48 5 and the rebels; that's correct, is it not?

6 A. I don't - that's possible, but he was not a member of the
7 committee. Gambia was not, but that is possible that any member
8 of ECOWAS could have. In trying to help, it's possible.

9 Q. And he had first made that offer in early December, isn't
10:32:12 10 that correct?

11 A. I don't know. It's possible. I am not aware.

12 Q. And if we could look at tab 9 in annex 2B, please? We will
13 be looking at page 1 of 8, 29 December. We see again this is
14 "Sierra Leone Web - Sierra Leone News - December 1998". It is 29
10:33:17 15 December. Mr Taylor, if we could look down at the third
16 paragraph:

17 "Gambian President Yahya Jammeh has repeated his offer to
18 mediate between the Sierra Leone government and the rebels and
19 has reportedly called on the UN, the OAU and ECOWAS to let him
10:33:43 20 handle the crisis.

21 Jammeh first offered to mediate during President Kabbah's
22 four-day state visit in Banjul in early December, but he said he
23 had heard nothing since Kabbah returned to Freetown."

24 Now, Mr Taylor, when he made this offer to mediate,
10:34:13 25 President Jammeh gave no indication he was aware that you were
26 carrying out a role as point President for peace in Sierra Leone,
27 did he?

28 A. We don't know that he made this offer. So that question, I
29 can't answer it.

1 Q. Mr Taylor, based on what we have before us, there is not
2 included such a statement from President Jammeh, is there?

3 A. Well, your Honours, the system in ECOWAS, if President
4 Jammeh had requested this, ECOWAS would have put him on it. So I
10:34:43 5 have problems with Jammeh even requesting this.

6 Q. Mr Taylor, in the information before you there is no
7 indication that President Jammeh made any statement of his
8 awareness that you were then acting as the point President for
9 peace in Sierra Leone, isn't that correct?

10:35:05 10 A. That's correct.

11 MS HOLLIS: If we could ask that this page 1 of 8, 29
12 December 1998, Sierra Leone Web - Sierra Leone News be marked as
13 MFI-334B.

14 PRESIDING JUDGE: The document is so marked.

10:35:35 15 MS HOLLIS: Thank you, Madam President:

16 Q. Now, Mr Taylor, after you say you began meeting with Sam
17 Bockarie, from September 1998 onward up until the Freetown
18 invasion of January 1999, you were aware that Sam Bockarie was
19 threatening to carry out attacks in Sierra Leone, weren't you,
10:36:05 20 Mr Taylor?

21 A. No, in that way aware, not - there were - there could have
22 been news reports, but I was not aware that Sam Bockarie had
23 threatened to attack Freetown.

24 Q. You were being briefed about his threats to carry out
10:36:25 25 attacks in Sierra Leone; isn't that correct, Mr Taylor?

26 A. I don't recall that specific briefing that Sam Bockarie had
27 threatened to attack Freetown. I don't recall that specific
28 briefing.

29 Q. Mr Taylor, the question was attacks in Sierra Leone?

1 A. I have just said I don't recall that specific briefing.
2 You asked me if I was briefed. I said I don't recall that
3 specific briefing.

4 Q. Mr Taylor, in your role within the committee it would have
10:36:50 5 been important for you to be briefed on sufficient threats, would
6 it not?

7 A. Well, of course if there was such a threat, depending on
8 what the national security team felt at that time, they
9 could - that was their decision to inform me or not to inform me.

10:37:08 10 Q. And of course, if you had been aware of such threats
11 because of your watching television, that would have been
12 important for you to know, yes, Mr Taylor?

13 A. Which of the questions you want me to answer, counsel?

14 Q. Well, let me repeat it, Mr Taylor. If you had been aware
10:37:29 15 of such threats because of your watching television, that would
16 have been important for you to know, yes?

17 A. It would have been important for me to know if - if - I was
18 watching it.

19 Q. And you have told this Court that you routinely watched
10:37:47 20 CNN; isn't that correct, Mr Taylor?

21 A. In the evening hours, yes.

22 Q. And also if the times you listened to the radio you heard
23 such threats, that would have been important to you, wouldn't it?

24 A. Of course it would have been important to me, yes.

10:38:02 25 Q. And also any newspapers that you may have read that held
26 reports of such threats, that would have been important to you,
27 yes?

28 A. If I had read them, yes.

29 Q. Now, Mr Taylor, you were aware, weren't you, that in early

1 September 1998, on international media, Sam Bockarie had
2 pronounced that he would order his troops to kill every living
3 thing, including chickens, if their leader was not released?

4 A. I don't recall that specific briefing to me, counsel.

10:38:43 5 Q. Now, that would have been important for you to know such a
6 thing, would it not, Mr Taylor?

7 A. It would have been important, but I don't recall receiving
8 that briefing.

9 Q. So you are saying that people who are responsible for
10:38:55 10 keeping you abreast of events would have - they would have been
11 negligent if they had not have given you that information, would
12 they not, Mr Taylor?

13 A. I wouldn't say that. I wouldn't say that they would be
14 negligent, counsel.

10:39:09 15 Q. Now, Mr Taylor, the truth is you actually were aware of
16 that pronouncement by Sam Bockarie, were you not?

17 A. I have answered you, counsel. I have told you I cannot
18 recall being briefed about that pronouncement specifically.

19 Q. If we could look at tab 12 in annex 2B, please. That is
10:40:10 20 tab number 12 in annex 2B, an Inter Press article dated 7
21 September 1998. Could we bring that down so we could see the
22 very top of the page, please. IPS, Inter Press Service Global
23 Information Network, IPS, Inter Press Service, September 7, 1998,
24 Monday. Headline, "Politics, Sierra Leone. No lawyer willing to
10:40:46 25 defend rebel leader". Do you see that, Mr Taylor, yes?

26 A. I see what you are reading.

27 Q. And then if we could move to page 2 of that article,
28 please. If we could look down, you see - if you would move that
29 a bit so that the far right of the page is shown. You see the

1 line that is drawn there, Mr Taylor?

2 A. I see the line that is drawn.

3 Q. And if we look at the line that is drawn there, at that
4 portion of the article, it reads:

10:41:39 5 "Even as Sankoh was being whisked from the courtroom to an
6 undisclosed place of detention, on September 4 RUF's second in
7 command Colonel Sam Bockarie, alias, Mosquito, threatened to wage
8 a campaign of genocide if the rebel leader was not immediately
9 released.

10:42:00 10 'I will order my troops to kill everything living thing,
11 including chickens, if our leader is not released', he was quoted
12 as saying by a leading European radio station, monitored here."

13 Now, Mr Taylor, this pronouncement of Sam Bockarie as early
14 as 4 September 1998, that was very important for you to know
10:42:26 15 about that, wasn't it, Mr Taylor?

16 A. Well, this is a piece by Lansana Fofana. I have said to
17 this Court three or four times in the last ten minutes: I do not
18 recall my staff giving me this specific briefing. I have said
19 that four times.

10:42:42 20 Q. So, Mr Taylor, when you met with Sam Bockarie in September
21 1998, you didn't raise this issue with him because, according to
22 you, you were unaware of it?

23 A. That is correct.

24 MS HOLLIS: Madam President, I would ask this that this be
10:43:01 25 marked for identification and as a separate MFI.

26 PRESIDING JUDGE: The document will be marked MFI-335.

27 MS HOLLIS: Thank you, Madam President:

28 Q. Now, Mr Taylor, you have previously told these judges that
29 you do not remember seeing a report in mid-November 1998 wherein

1 Sam Bockarie said that the RUF would destroy every living thing
2 if anything happened to Foday Sankoh, their leader. Do you
3 recall telling the judges that on 25 November?

4 A. I very well could have told them, yes, because I don't
10:44:00 5 recall.

6 Q. If you would like, we could look at the transcript of that?

7 A. No, I mean, I said I very well - you said I said that I
8 didn't recall. I said, yes, I didn't recall, so.

9 Q. Now, Mr Taylor, that wasn't a true statement on your part,
10:44:16 10 was it?

11 A. It was very true.

12 Q. Because that statement by Sam Bockarie was known by you,
13 was it not?

14 A. That statement was not known by me.

10:44:30 15 Q. And that statement was known by you because, first of all,
16 you were very aware of what he was doing because he was acting
17 with your knowledge and control or consent. Isn't that right?

18 A. That is totally incorrect.

19 Q. And, secondly, Mr Taylor, you would have been aware of the
10:44:49 20 statement because, as point President for peace, it would be very
21 important that you knew of such a statement from Sam Bockarie.
22 Isn't that correct?

23 A. That's a subjective question. But it would have been
24 important for me to have known that and I am sure it would have
10:45:05 25 altered some of my dealing with him or I would have maybe been
26 harder, you know, in certain areas. But I do not recall getting
27 it and I would never have accepted Sam Bockarie in my presence
28 without telling him in September that what he had said was
29 totally unacceptable. I would have done that.

1 Q. Now, Mr Taylor, in his pronouncement at that time, you're
2 aware, aren't you, that Sam Bockarie indicated that he was a
3 ruthless commander?

4 A. I don't know that Sam Bockarie said that. Did he say that?

10:45:47 5 Q. And that he was ready to damage, but would wait until
6 something happened to Foday Sankoh. You were aware of that,
7 weren't you, Mr Taylor?

8 A. No, I was not aware of that.

9 Q. And in that pronouncement he made it clear that when he
10:46:00 10 took Freetown he would clear every living thing and building. He
11 would fight, kill, kill, and kill. The more they told him to
12 stop, the more he would kill. You were aware of those statements
13 by Sam Bockarie, were you not?

14 A. Sorry, Ms Hollis, I was not aware.

10:46:18 15 Q. Mr Taylor, you were aware of those statements because of
16 your firsthand knowledge of what the rebels were doing in Sierra
17 Leone. Isn't that correct, Mr Taylor?

18 A. That is totally incorrect.

19 Q. And you were also aware because, as the point President for
10:46:31 20 peace, people who were briefing you would have briefed you about
21 these very serious statements by Sam Bockarie. Isn't that
22 correct?

23 A. That is incorrect. Anytime a point President - then one -
24 this quote could assume that President Hu Jintao of China is
10:46:50 25 aware of everything happening in North Korea. I think that's a
26 twisted logic. Totally unaware of everything that is happening
27 in Sierra Leone. No.

28 Q. Mr Taylor, we are not talking about a minor detail, are we;
29 we are talking about a very serious statement by Sam Bockarie, a

1 man you thought wanted peace, according to what you told these
2 judges?

3 A. Exactly. But it doesn't mean that I know everything that
4 he is doing inside Sierra Leone. Nobody would know.

10:47:11 5 Q. Now if we could please look at tab 13 in annex 2B, "Sierra
6 Leone Web - Sierra Leone News - November 1998, page 1 of 1." If
7 we could first slide it down so we can see the very top of that
8 page, please. We see, "Sierra Leone Web - Sierra Leone News -
9 November 1998, page 1 of 1." Mr Taylor, you see 19 November?

10:48:25 10 You see that, Mr Taylor?

11 A. I see 19 November.

12 Q. And you see the line on that first paragraph. Correct,
13 Mr Taylor?

14 A. I see the line on the first paragraph.

10:48:35 15 Q. "'The Revolutionary United Front will destroy every living
16 thing if anything happens to their leader, Corporal Foday
17 Sankoh,' RUF commander Sam Maskita Bockarie told the newspaper
18 for the people in a report published on Wednesday. Sankoh is
19 currently being held at Pademba Road Prison in Freetown where he
10:48:58 20 is preparing an appeal against his conviction and death sentence
21 on treason charges. 'I am a ruthless commander,' Bockarie said
22 in a telephone interview. 'I am ready to damage but I am waiting
23 until something happens to Sankoh. When I take Freetown I shall
24 clear every living thing and building. To my God, I'll fight.
10:49:21 25 I'll kill and kill, and the more they tell me to stop, the more
26 I'll kill. Only Sankoh can tell us to stop.'

27 Bockarie rejected a call by United States special envoy to
28 Africa, Reverend Jesse Jackson, for the RUF to lay down its arms.
29 'The US is a big hypocrite whose intention is to steal our

1 natural resources rather than bring peace to the country,' he
2 said. 'America and the world should know that we shall not lay
3 down arms, because only a defeated man can do so.' "

10:50:14 4 So, Mr Taylor, 19 November, this is what Sam Bockarie is
5 reported to have said. Now, Mr Taylor, when Sam Bockarie made
6 these statements, was he in Monrovia when he made these
7 statements?

8 A. We haven't even established whether he made these
9 statements. There is a report here before me with no name, who
10:50:32 10 wrote it, no title, and nothing and you are asking me to comment
11 as to - now your question is when he made them. We haven't
12 even - I don't - how am I supposed to know, one, if he did make
13 it or where he made it. So what can I say?

14 PRESIDING JUDGE: Mr Taylor, if you don't know the answer,
10:50:49 15 it is okay to say that you don't know the answer.

16 THE WITNESS: I don't --

17 PRESIDING JUDGE: But counsel is perfectly entitled to ask
18 a question.

19 THE WITNESS: Yes, okay. Your question is where did he
10:51:00 20 make these statements?

21 MS HOLLIS:

22 Q. Was he in Monrovia when he made these statements?

23 A. If he made these statements he was definitely not in
24 Monrovia.

10:51:09 25 Q. When do you say he was in Monrovia on his third trip when
26 he was going to Burkina Faso?

27 A. Beg your pardon?

28 Q. When do you say he was in Monrovia on his third trip when
29 you say he was going to Burkina Faso?

1 A. I have already told this Court. The last week in - I say
2 the end to the beginning of December when he came through his
3 third trip.

4 Q. The end to the beginning of December?

10:51:38 5 A. That is correct.

6 Q. So he was either in Monrovia on his way to Burkina Faso the
7 beginning of December or the end of December, is that what you
8 are saying?

9 A. The end of November to the beginning of December, his third
10:51:55 10 trip. And this is - this news report is dated 19 November. So
11 it doesn't say he made the statement on the 19th or wherever he
12 was.

13 MS HOLLIS: If I could ask that this be marked for
14 identification.

10:52:13 15 PRESIDING JUDGE: Do you want to include this in the
16 MFI-334 or not?

17 MS HOLLIS: Yes, Madam President. 334, I believe it would
18 be B.

19 PRESIDING JUDGE: This is MFI-334C.

10:52:30 20 MR GRIFFITHS: Madam President, can I just observe whilst
21 we are looking at this document that I understood that the
22 protocol was that the Prosecution would mark in the margin the
23 particular passage they were seeking to rely on. If one looks at
24 this page, this particular passage has not been so marked. It's
10:52:48 25 another passage on the page which has been marked in that way.

26 So can I ask that if there are any further at this point
27 unidentified passages that my learned friend intends to rely
28 upon, that we can be given some notice of that, please.

29 PRESIDING JUDGE: Mr Griffiths, the copy that I have is

1 marked. In fact it has two passages marked on that page.

2 MR GRIFFITHS: [Microphone not activated].

3 PRESIDING JUDGE: That's because your photocopy I think
4 didn't go far enough on the right. My copy indicates in the
10:53:22 5 margin that it is so marked.

6 MS HOLLIS: Indeed it was so marked and that was the copy
7 that was distributed per the order of the court.

8 MR GRIFFITHS: Well, it may well be my copy.

9 PRESIDING JUDGE: Yes, continue, Ms Hollis.

10:53:44 10 MS HOLLIS: Thank you, Madam President:

11 Q. Now, Mr Taylor, you were also aware of Sam Bockarie's
12 pronouncement that he would launch an attack on the capital
13 around the new year unless the government released Foday Sankoh.
14 You were aware of that, weren't you, Mr Taylor?

10:54:11 15 A. I was not aware of that.

16 Q. If we could please look at MFI-66, which was DCT-100, tab 1
17 in binder 1 for week 32. It is a special report of the
18 Secretary-General on the United Nations Observer Mission in
19 Sierra Leone, 7 January 1999. If we see the first page it is a
10:56:47 20 Security Council document, S/19/1999/20, 7 January 1999,
21 indicating a special report of the Secretary-General on the
22 United Nations Observer Mission in Sierra Leone, and he indicates
23 in paragraph 1 that he had submitted the third progress report on
24 16 December, but in view of the serious developments in the
10:57:15 25 country since that time he is submitting the present report.

26 In paragraph 5, he indicates on 23 December 1998, the
27 United Nations observer mission withdrew the seven military
28 observers who had been deployed there, along with some of their
29 equipment.

1 And then if we look at page 2 of this document, we see
2 paragraph 6:

3 "Tension continued to rise in Freetown in anticipation of a
4 possible rebel attack. A rebel leader, Sam Bockarie, threatened
10:58:10 5 to launch an assault on the capital around the New Year unless
6 the government released the leader of the Revolutionary United
7 Front (RUF), Corporal Foday Sankoh. Rebels advancing in the
8 countryside announced they were fighting ECOMOG and the United
9 Nations."

10:58:31 10 And then they indicate:

11 "On 24 December, as a precautionary measure UNOMSIL began
12 relocating nonessential civilian staff from Freetown and withdrew
13 the military observer teams deployed at Bo and Kenema to Lungi."

14 PRESIDING JUDGE: Ms Hollis, sorry to interrupt. Someone
10:58:54 15 has drawn my attention to the last MFI number. I might have
16 misspoken, but I thought I said MFI-334C. That's what I said,
17 but it's recorded as 335C. That is an error.

18 MS HOLLIS: Yes, thank you. And my understanding is that
19 this is 334C as in Charlie. Thank you, Madam President:

10:59:27 20 Q. So now, Mr Taylor, the United Nations became aware of this
21 pronouncement by Sam Bockarie that he would launch an attack on
22 the capital around the New Year, but you were never aware of that
23 pronouncement?

24 A. No, I was not.

10:59:49 25 Q. That's just not true, is it, Mr Taylor?

26 A. It is very true. I was not aware.

27 Q. First of all, Mr Taylor, it's true because you took part in
28 the plan for this operation, isn't this true?

29 A. That is totally, totally untrue.

1 Q. And Mr Taylor, even assuming for a moment that your story
2 to these judges about being the point President for peace is
3 true, you would have known about this pronouncement because it
4 would have been very important to you, isn't that correct?

11:00:18 5 A. I did not know about the announcement, Ms Hollis.

6 Q. So, Mr Taylor, after his trip to Burkina Faso, that you
7 tell this Court was for the purposes of peace, Sam Bockarie is
8 talking about - or threatening to launch an assault on the
9 capital around the New Year. Mr Taylor, this man that you
10 thought wanted peace didn't really want peace, did he, Mr Taylor?

11:00:48

11 A. That's a subjective question. I don't know. He told me he
12 wanted peace. I took his word. I told my colleagues. I can't
13 say whether it was in his heart. I can't speak to that.

14 Q. Mr Taylor, you knew that he never wanted peace because your
15 discussions with him had to do with commencing attacks and
16 continuing attacks in Sierra Leone, isn't that correct?

11:01:05

17 A. Totally incorrect.

18 Q. Now, Mr Taylor, you were also aware, were you not, that Sam
19 Bockarie, in December 1998, had publicly pronounced that the
20 rebels were going to march into Freetown on New Year's Day
21 unless the government agreed to their terms; you were aware of
22 that, weren't you?

11:01:41

23 A. I was not aware of that, Ms Hollis.

24 Q. As the point President for peace, you were aware of that,
25 correct, Mr Taylor?

11:01:57

26 A. I was not aware of that, Ms Hollis.

27 Q. Now if we could look at tab 9 in annex 2B. If we could go
28 to page 5 of that particular tab. If we could look at the very
29 top of the page, please. And we see this is the Sierra Leone Web

1 - Sierra Leone News - December 1998, page 5 of 8. If the usher
2 could now show us the bottom of that page, please. And you see,
3 Mr Taylor, the bottom of that page indicates the date 25
4 December. Do you see that, Mr Taylor?

11:03:34 5 A. I see the date, 25 December.

6 Q. Thank you. Now if we could move to page 6. Mr Taylor, you
7 see the paragraph with the line beside it?

8 A. Yes, I see that paragraph.

9 Q. And it is the paragraph just above 24 December, correct?

11:04:12 10 A. That is correct.

11 Q. And here we have in this paragraph:

12 "RUF commander Sam Mosquito Bockarie threatened on Friday
13 to attack Freetown on New Year's Eve, then moved up the deadline
14 claiming the arrival of ECOMOG reinforcements, unless the

11:04:34 15 government agreed to negotiate with the rebels. 'If Kabbah does
16 not agree to respond to our request to open dialogue, then in 48
17 to 72 hours we will enter Freetown', Bockarie told the Agence
18 France Presse (AFP). 'We are going to march into Freetown on New
19 Year's Day unless the government agrees to our terms', Bockarie

11:04:58 20 said in a separate Reuters interview. 'We have the will and the
21 way.' Bockarie claimed that AFRC/RUF rebels had captured Makeni
22 and were battling for Kenema. He also claimed to have captured
23 Waterloo, about 20 miles from southeast of Freetown, and nearby
24 Benguema, where he said rebel forces had seized the military
11:05:23 25 training barracks. There has been no independent confirmation of
26 his claims."

27 So now, Mr Taylor, you were aware, were you not, that Sam
28 Bockarie was basically telling the international community and
29 Sierra Leone that unless his terms were agreed to, an attack on

1 Freetown was imminent. You were aware of that weren't you,
2 Mr Taylor?

3 A. No, I was not aware. Agence France - AFP reports, how am I
4 supposed to know? I am not aware.

11:05:58 5 Q. So you weren't briefed on any reports that would have come
6 from Agence France Presse?

7 A. You said the international community. I don't see Agence
8 France being the international community. I am not aware that
9 Sam Bockarie is making these statements in Sierra Leone. Neither
11:06:15 10 do they even say here that the Committee of Five or ECOWAS has
11 been informed. I am not aware.

12 Q. Mr Taylor, you were not briefed on Reuters articles either?

13 A. What is the question? If I am briefed on Reuters articles?

14 Q. You said you didn't know the AFP. Were you briefed on
11:06:36 15 articles that came out of Reuters?

16 A. The determination of what briefings I received rests with
17 my National Security Council. If there were at times something
18 important from Reuters, they might inform me. If they felt it
19 was not important, they did not inform me. So I would just say
11:06:53 20 no.

21 Q. Mr Taylor, did your briefers know that you were the point
22 President for peace in Sierra Leone?

23 A. Of course. The Foreign Minister went to all the meetings.

24 Q. So they were aware of that?

11:07:02 25 A. Every one of them. They are part of the National
26 Security Council. If it was important, they would tell me.

27 Q. And, Mr Taylor, you briefed them about your role and the
28 fact that information about what was happening in Sierra Leone
29 would be important to you, did you not?

1 A. If I had briefed who?

2 Q. Your briefers.

3 A. When does the President brief his National
4 Security Council? That's twisted logic.

11:07:29 5 Q. You don't tell them what's important to you, Mr Taylor?

6 A. The National Security Council, the Foreign Minister, is
7 aware. I don't brief my National Security Council; they brief
8 me.

9 Q. And Mr Taylor, you said that if it was important, they
11:07:40 10 would tell you. This was important, wasn't it, Mr Taylor?

11 A. The assessment, Ms Hollis is not made by me. The
12 assessment as to what the President gets is made by the council.

13 Q. Mr Taylor, you just told the Court that if it was
14 important, they would brief you?

11:07:59 15 A. Yes, on the assessment. I said that a hundred times.

16 Q. So a threat for an eminent attack on Freetown unless terms
17 were met wouldn't have been considered important by your
18 briefers; is that what you are telling the Court?

19 A. That's not what I am telling the Court. I continue to say
11:08:15 20 to this Court that the National Security Council assesses
21 whatever they assess and they report to me. I am in no position
22 here to determine what was important for them at the time of
23 their assessment because I am not present, no.

24 Q. And you gave no guidance to your briefers as to what you
11:08:33 25 considered important for you?

26 A. No President tells the briefers this and that and other.
27 That's not the way it works. Maybe on your side --

28 Q. Mr Taylor, that's not true, is it?

29 A. It is very true, Ms Hollis.

1 Q. You had a very important job, according to --

2 A. You never work for a government before, so you cannot say
3 it is not true.

4 PRESIDING JUDGE: Mr Taylor, please control yourself. Just
11:08:57 5 stick to the questions asked. No personal comments.

6 MS HOLLIS:

7 Q. Mr Taylor, you had, according to what you've told this
8 Court, a very important role for peace in Sierra Leone?

9 A. Very important.

11:09:09 10 Q. And you made it known what kind of information you felt you
11 needed to have to carry out that role; isn't that right?

12 A. No, that is not right. I don't determine that --

13 Q. You would have been remiss in your duties if you hadn't
14 done that; isn't that right, Mr Taylor?

11:09:20 15 A. That is not right, Ms Hollis.

16 Q. Mr Taylor, you weren't doing a very good job as point
17 President for peace, were you?

18 A. I was doing - well, as far as I'm concerned, my
19 contributions are very clear. Throughout the process, I think I
11:09:35 20 was.

21 Q. You were, according to you, remaining uninformed of very
22 important pronouncements coming out of Sierra Leone, isn't that
23 correct?

24 A. When you say "very important pronouncements", it depends on
11:09:48 25 what gets out and what doesn't get out. This Sierra Leone Web
26 page doesn't mean that it's even correct, so no.

27 MS HOLLIS: Before we move on, could I ask that those two
28 pages, 5 and 6, Sierra Leone News Web, be marked for
29 identification as part of the composite exhibit.

1 PRESIDING JUDGE: What exactly on page 5 do you want us
2 to --

3 MS HOLLIS: 5 is to show you the date, that is, when this
4 was reported on the Sierra Leone Web - Sierra Leone News, which
11:11:03 5 shows 25 December. That is the sole purpose for page 25 at this
6 time.

7 PRESIDING JUDGE: The two pages 5 and 6 are marked
8 MFI-334D.

9 MS HOLLIS: Thank you, Madam President:

11:11:34 10 Q. Now, Mr Taylor, you were also aware of public
11 pronouncements Sam Bockarie made around 27 December, were you
12 not?

13 A. No, I was not. What were the remarks?

14 Q. And you were aware that around that time Sam Bockarie told
11:12:00 15 Associated Press that his fighters had captured Makeni and killed
16 60 ECOMOG soldiers and dragged their bodies through the streets
17 as an example to everyone. You were aware of that, weren't you?

18 A. No, I was not.

19 Q. And, Mr Taylor, you were also aware that Sam Bockarie
11:12:31 20 threatened an assault on Freetown and called on President Kabbah
21 to resign; isn't that correct, Mr Taylor?

22 A. I did not receive - I am not aware. I was not aware.

23 Q. And you were also aware that at that time Sam Bockarie made
24 it clear that if President Kabbah failed to resign the rebels
11:12:52 25 would start bombarding Freetown and would not stop until victory
26 was won. Mr Taylor, you were aware of that, were you not?

27 A. No, Ms Hollis, I was not aware.

28 Q. Now, those were important pronouncements by Sam Bockarie,
29 were they not, Mr Taylor?

1 A. Well, according to him, they were important. Those were -
2 if he said that, those were very serious statements.

3 Q. And as the point President for peace, that would have been
4 important for you to know, wouldn't it, Mr Taylor?

11:13:20 5 A. If he had said that, it would be important for me to know.

6 Q. And, in fact, you did not know that. Isn't that correct,
7 Mr Taylor?

8 A. I did not know that.

9 Q. Now if we could again look at tab 9 in annex 2B. At this
11:13:46 10 point we are looking first at page 3 and then at page 4. Could
11 we look at the very top of that page, please. Again we see,
12 "Sierra Leone Web - Sierra Leone News - December 1998, page 3 of
13 8." Then if we could go to the bottom, please, and we see 27
14 December. Then if you could please go to the next page, which is
11:14:53 15 page 4 of 8. At the top of the page, please. And if you could
16 move it a bit so that the line on the right is shown.

17 Now, Mr Taylor, if we look at the third line down in that
18 paragraph we see:

19 "RUF commander Sam Maskita Bockarie also made claims that
11:15:30 20 his fighters had captured the town" - and if we look above we see
21 Makeni, the situation in Makeni is what they are talking about.
22 So, "... made claims that his fighters had captured the town,
23 saying Saturday that the rebels had killed 60 ECOMOG soldiers and
24 dragged their bodies through the streets as an example to
11:15:51 25 everyone. Bockarie, who has threatened an AFRC/RUF rebel assault
26 on Freetown, called on President Kabbah to resign. 'Failure of
27 Kabbah to resign and we will start bombarding Freetown and will
28 not stop until victory is won,' Bockarie told the Associated
29 Press."

1 So now, Mr Taylor, you were very well aware that this man
2 that you thought, according to what you told these judges, was
3 committed to peace, was making these pronouncements, were you
4 not, Mr Taylor?

11:16:29 5 A. I was not.

6 Q. And you were aware, if for no other reason, because
7 according to your story of being point President for peace it was
8 very important that you know this. Isn't that right, Mr Taylor?

9 A. That's again subjective. It would be important - for the
11:16:46 10 help of the judges, your Honours, the fighting in around
11 December, generally, everybody - in fact, ECOMOG reports the
12 fighting. I am not aware of these pronouncements by Bockarie,
13 no.

14 Q. Mr Taylor, all of these denials that you are making is
11:17:06 15 simply because your awareness of these pronouncements undermines
16 the story you have told these judges about Sam Bockarie being
17 committed to peace. Isn't that right, Mr Taylor?

18 A. No, Ms Hollis.

19 Q. And it also undermines the story you have told these judges
11:17:27 20 about why you were meeting with Sam Bockarie. Isn't that right,
21 Mr Taylor?

22 A. No, Ms Hollis.

23 Q. And, certainly, Mr Taylor, you would agree it would be
24 important for the point President for peace to know about Sam
11:17:46 25 Bockarie calling on President Kabbah to resign. Correct?

26 A. It would be important for me to know.

27 Q. And saying that his failure to resign, they would start
28 bombarding Freetown and not stop until victory was won. Very
29 important for you to know that, yes, Mr Taylor?

1 A. If he made that statement, of course it would be important
2 for me to know.

3 Q. And your briefers briefed you about that, did they not,
4 Mr Taylor?

11:18:09 5 A. No, they did not brief me about that. Like I said to these
6 judges, quite frankly, I am aware of fighting in December. I am
7 not aware of these pronouncements alleged by this Sierra Leone
8 page that Bockarie is making. I am not aware of these
9 announcements that he is making.

11:18:30 10 MS HOLLIS: Madam President, just to be sure that I am
11 clear, I believe we had marked pages 5 to 6 as 334D, had we not?
12 If not, I ask that we do so.

13 PRESIDING JUDGE: You want now pages 3 and 4?

14 MS HOLLIS: Yes and I believe we are now on 334E, correct?

11:18:59 15 PRESIDING JUDGE: That is correct. Pages 3 and 4 are
16 marked MFI-334E.

17 MR GRIFFITHS: Madam President, I am becoming somewhat
18 concerned at the manner in which this cross-examination is being
19 conducted this morning and its implications in due course,
11:19:23 20 because my understanding is in cross-examination it's the answer
21 which counts and not the question, and that one cannot introduce
22 evidence merely by asking a question. So we have this example
23 now where the witness denies knowledge of the particular
24 statement and nonetheless the Court is being invited to mark for
11:19:49 25 identification this particular passage. No doubt in due course
26 so that reliance can be placed upon it, but it's the answer given
27 by the witness which is important. And, in effect, my learned
28 friend is seeking, through this stratagem, to introduce evidence
29 of statements made by Bockarie in this way and in our submission

1 it's totally illegitimate.

2 PRESIDING JUDGE: Ms Hollis, do you wish to reply - to
3 respond, rather?

4 MS HOLLIS: Well, Madam President, first of all, that is
11:20:27 5 certainly the law if it is a question and an answer only, then of
6 course questions are not evidence unless they are adopted by the
7 witness. So if it is a question and an answer only, then the
8 witness's answer is the evidence of record.

9 The whole reason that you are allowed to impeach by using
11:20:45 10 other materials is that if those materials are admitted,
11 your Honours may consider those materials in determining if the
12 witness is testifying truthfully.

13 So while what Defence counsel is arguing is correct, it has
14 nothing to do with our ability to use materials, to have them
11:21:04 15 marked for identification and later to seek their admission into
16 evidence. If they are admitted into evidence, then those are
17 materials that your Honours may consider in determining the
18 truthfulness of the responses from the witness, and it is for
19 these reasons that these materials are being used. The
11:21:24 20 Prosecution is not required to simply accept a witness's answer.
21 We may go back over that area and we may also, when permitted by
22 the Trial Chamber, use other materials to show that the witness
23 is not testifying truthfully.

24 PRESIDING JUDGE: Anything further, Mr Griffiths?

11:21:46 25 MR GRIFFITHS: Well, with respect, Madam President,
26 your Honours, my learned friend concedes the point, so the
27 exercise we are actually engaged on now is the Prosecution
28 placing before the Court material which they in due course will
29 seek to rely upon, but it's evidence being presented through the

1 mouth of counsel only. It has nothing to do with the response of
2 the defendant.

3 My submission is that this is a totally illegitimate way of
4 proceeding because in effect the Prosecution are introducing
11:22:22 5 evidence through the back door which in due course they are
6 seeking to rely upon.

7 [Trial Chamber conferred]

8 PRESIDING JUDGE: We are of the view on the Bench that what
9 the Prosecution is doing right now is simply to mark for
11:22:45 10 identification these newspaper clippings. They have not yet
11 sought to tender into evidence these documents and, of course,
12 the questions and answers that counsel has asked and the witness
13 given are on the record and speak for themselves. When the time
14 comes for the documents to be tendered, if and when that time
11:23:09 15 comes, then these arguments may be considered.

16 MR GRIFFITHS: Very well.

17 PRESIDING JUDGE: But for now we will proceed in this way.

18 MS HOLLIS:

19 Q. Now, Mr Taylor, you were also aware, were you not, that in
11:23:50 20 the same month of December, Sam Bockarie publicly stated that
21 they had captured Waterloo and Benguema, 20 and 30 miles from
22 Freetown respectively, and he made it clear that the rebels were
23 no longer seeking dialogue, it was too late. You were aware of
24 that, weren't you, Mr Taylor?

11:24:14 25 A. I was not aware of that.

26 Q. And, Mr Taylor, you were aware of that because it would
27 have been very important for you to know that as the point
28 President for peace. Correct, Mr Taylor?

29 A. I was not aware of that.

1 Q. And indeed your briefers briefed you about this because
2 this was very important information. Isn't that correct,
3 Mr Taylor?

4 A. My national security council did not brief me of that
11:24:37 5 information, no.

6 Q. Did you have any other briefers other than the national
7 security adviser, Mr Taylor?

8 A. That's what I am trying to bring you to know that my
9 briefers were my national security council, no.

11:24:49 10 Q. And your national security adviser, or council, briefed you
11 on this. Isn't that correct?

12 A. They did not.

13 Q. Now, you also received briefings from other members of your
14 government, did you not, including the Ministry of Information

11:25:07 15 personnel?

16 A. No.

17 Q. So your testimony now is that everything was channeled to
18 you through the national security you are saying council now. Is
19 it national security council now who briefed you?

11:25:21 20 A. What do you mean when I say council now? I have always
21 said national security council.

22 Q. Not the national security adviser?

23 A. Well, he heads the council.

24 Q. So who actually briefed you?

11:25:31 25 A. The briefing is done by the national security adviser.
26 That's who briefed me, but it's the council's briefing.

27 Q. Mr Taylor, this would have been very important for you to
28 know. Isn't that correct?

29 A. Something like that, if they felt it was important, it

1 would have been important for me to know if he had made those
2 threats.

3 Q. That would have been important in your mind as well,
4 wouldn't it?

11:25:54 5 A. In my mind I would say it would be frankly yes.

6 Q. And indeed you were briefed that?

7 A. I was not.

8 Q. If we could please look again at tab number 9. At this
9 point we will be looking at page 2 of 8. Now, Mr Taylor, we see
11:26:52 10 again this is Sierra Leone Web - Sierra Leone News - December
11 1998, page 2 of 8. If we could now look at the bottom of that
12 page, please. If we could look at the date, which is 28
13 December. You see that, Mr Taylor?

14 A. Yes, I do.

11:27:21 15 Q. And then the second paragraph from the bottom that is
16 marked:

17 "RUF commander Sam Maskita Bockarie claimed Friday to have
18 captured Waterloo and Benguema, 20 and 30 miles from Freetown
19 respectively. ECOMOG commander Major General Timothy Shelpidi
11:27:42 20 denied the rebel claim, saying ECOMOG troops were in control of
21 the area. In an interview on Sunday, Bockarie said the rebels
22 were no longer seeking dialogue, adding it was too late now."

23 Now, Mr Taylor, now that you have seen that, it is correct,
24 is it not, Mr Taylor, that you were briefed about that?

11:28:06 25 A. No, it's not true.

26 Q. Mr Taylor, at this time in late December 1998, you were
27 aware of the rebel advance towards the capital, weren't you,
28 Mr Taylor?

29 A. I was aware that there was fighting going on, yes. I was

1 aware.

2 Q. And you were aware that they were advancing toward the
3 capital. Isn't that correct, Mr Taylor?

4 A. Well, I am not sure if it's toward the capital. I am aware
11:28:30 5 that - in fact, ECOMOG is reporting heavy fighting. I am not
6 aware of the geography of Sierra Leone. I am aware that there is
7 fighting going on, you know, going towards the capital, but I
8 don't know the specific towns, but ECOMOG is reporting that and I
9 am briefed that ECOMOG is reporting heavy fighting in or around
11:28:58 10 Freetown, around Freetown, really.

11 Q. And you were also aware that fighting was going on in
12 various areas of the country at this time, isn't that correct,
13 Mr Taylor?

14 A. Oh, yes, I have said that. I am aware that fighting is
11:29:09 15 going on. Not the specific location, but I am aware that
16 fighting is going on.

17 MS HOLLIS: If we could also ask that this be marked as
18 MFI-334F. This was page 2 of 8.

19 PRESIDING JUDGE: 2 of 8 is marked MFI-334F. We will take
11:29:46 20 our midmorning break. We resume at 12 o'clock.

21 [Break taken at 11.30 a.m.]

22 [Upon resuming at 12.00 p.m.]

23 PRESIDING JUDGE: Ms Hollis, please continue.

24 MS HOLLIS: Thank you, Madam President:

12:02:02 25 Q. Mr Taylor, you were also aware of another pronouncement
26 that Sam Bockarie made in late December to the effect that the
27 rebels would not stop shelling Freetown until they saw the Tejan
28 Kabbah government out. You were aware of that pronouncement,
29 were you not, Mr Taylor?

1 A. No, I was not.

2 Q. If we could look again at MFI-334B, page 1 of 8 for the
3 December 1998. The date is 29 December. And, Mr Taylor, if we
4 look at the second paragraph there which begins "ECOMOG sent 300
12:03:04 5 troops toward Lunsar Tuesday as RUF commander Sam Maskita
6 Bockarie claimed his forces had captured the town. Bockarie said
7 the rebels seized Lunsar on Tuesday after heavy fighting with
8 ECOMOG troops." Then if we go down, Mr Taylor, another six lines
9 to the line that begins with "then reports of civilian movements
12:03:35 10 from Lunsar". Mr Taylor, do you see that?

11 A. Just one minute, please, counsel.

12 Q. It would be the tenth line down from the top of that
13 paragraph, Mr Taylor.

14 A. Yes, okay, I see that portion.

12:03:56 15 Q. Then Bockarie said his forces would continue to head toward
16 Freetown despite calls by ECOWAS for negotiations. "'The issue
17 is not laying down arms. The issue is dialogue and getting our
18 leader Foday Sankoh released from prison,' Bockarie said. 'There
19 is our ultimatum. If a dialogue is not started, we will have to
12:04:19 20 invade Freetown. They have 48 hours.' He repeated his call for
21 Burkinabe President and current OAU chairman Blaise Compaore to
22 mediate between the rebels and President Kabbah. 'We are still
23 appealing to the OAU chairman to prevail on ECOWAS and the Tejan
24 Kabbah government to respond positively to our demand for
12:04:40 25 dialogue,' Bockarie said. 'But we will not stop shelling
26 Freetown until we see the Tejan Kabbah government out.'"

27 Now, Mr Taylor, you were well aware of that statement that
28 Sam Bockarie made in late December, were you not?

29 A. No, no, no, I was not aware of this --

1 Q. And, Mr Taylor --

2 A. -- that he had called upon them, no.

3 Q. -- you were aware that in late December, Sam Bockarie was
4 calling on Blaise Compaore to mediate between the rebels and

12:05:13 5 President Kabbah, according to the public pronouncement.

6 A. No. He may have said this when he visited with President

7 Compaore not in late December. Around about the middle of

8 December, he may have said this there, but I'm not aware. He

9 could have said it to President Compaore, but I'm not aware of

12:05:34 10 the discussions.

11 Q. Your good friend, President Compaore, wouldn't have told
12 you about that?

13 A. Well, he didn't tell me that he had been called upon. He
14 was OAU chairman. He was a part of the process anyway.

12:05:45 15 Q. He wouldn't tell you that Sam Bockarie had asked him to
16 mediate when you were the point President for peace, Mr Taylor?

17 A. Well, you say he wouldn't tell me. What I'm saying, he

18 didn't tell me. Your question is would he tell me. Well, he

19 didn't tell me.

12:06:02 20 Q. Mr Taylor, if you had been the point President for peace,
21 your good friend Blaise Compaore would have told you about this
22 Sam Bockarie request, would he not?

23 A. Well, it's possible that Blaise, with such information,
24 could - he did not tell me. And the fact is I was responsible.

12:06:18 25 I was the point person. The OAU chairman did not mention it to
26 me. He probably told the chairman of ECOWAS, but he didn't
27 mention it to me.

28 Q. But, Mr Taylor, you are telling this Court that as the
29 person responsible, the point person, you were unaware that in

1 Late December, Sam Bockarie was saying, "We will not stop
2 shelling Freetown until we see the Tejan government out"? That's
3 what you are telling the Court?

12:06:52

4 A. That's exactly what I'm telling this Court, that I was not
5 aware that Mr Bockarie had made this statement. Now, whether he
6 told President Compaore, I don't know. I was not aware in late
7 December that he had made this public pronouncement.

8 Q. That's just not true at all, is it, Mr Taylor?

9 A. Very true. It's very true.

12:07:06

10 Q. In fact, Mr Taylor, you were aware of all of these
11 pronouncements Sam Bockarie had made. Isn't that correct?

12 A. That is incorrect.

13 Q. You were aware well in advance of the 6 January attack on
14 Freetown that such an attack was imminent, weren't you,

12:07:22

15 Mr Taylor?

16 A. I was not.

17 Q. Yet you told these judges "all of us were surprised by this
18 situation in January of 1999"?

19 A. I told these judges the truth. I was - we were all

12:07:35

20 surprised, and I - if Bockarie had even tried to mention that to
21 Blaise as chairman of the OAU or myself, it would have been
22 unacceptable and we would have tried to do something about it.

23 We were never, never aware. I was surely not aware.

24 Q. That's just not true at all, is it Mr Taylor?

12:07:53

25 A. That is very true.

26 Q. In fact, Mr Taylor, you had given Sam Bockarie a satellite
27 phone in the fall of 1998, had you not?

28 A. What do you call "fall"? When you say "fall", what are you
29 referring to?

1 Q. Well, Mr Taylor, you know the seasons of the year.

2 A. Well --

3 Q. You had given him a satellite phone in the fall of 1998,
4 had you not?

12:08:12 5 A. I'm asking you to define fall. In Africa - I don't have
6 fall in Africa, so what do you mean by fall? I have told this
7 Court --

8 Q. Mr Taylor, you have studied in the United States. You have
9 a good grasp of English.

12:08:24 10 A. I want to know what you are referring to.

11 PRESIDING JUDGE: Ms Hollis, let's be definite. If there's
12 a time frame, please state it.

13 MS HOLLIS:

14 Q. Mr Taylor, when did you give Sam Bockarie the satellite
12:08:36 15 phone? You've told the judges about it before.

16 A. Of course.

17 Q. When did you give him the satellite phone --

18 A. I told these judges that I gave Sam Bockarie a satellite
19 phone in October of 1998. That's when I gave him a phone.

12:08:47 20 Q. And I think you told the judges that you gave him a
21 satellite phone so that you could talk with him about all of this
22 peace business that you were engaged in. Correct, Mr Taylor?

23 A. Not totally correct. I said I gave - if you are going to
24 quote me, I told these judges I gave the phone to Mr Bockarie so
12:09:07 25 that I and other members of the committee would have contact with
26 Mr Bockarie. That's what I said on the record.

27 Q. And you were going to have contact - you yourself,
28 Mr Taylor, were going to have contact with him for what purposes?

29 A. I'm a member of the Committee of Five and I am now opening

1 up the process of beginning discussions with the RUF. Of course,
2 that's the purpose.

3 Q. Well, Mr Taylor, you actually began talking to Sam Bockarie
4 in September not October, correct?

12:09:36 5 A. The first meeting that I met with Mr Bockarie, I did not
6 give him a phone, Ms Hollis. The second meeting --

7 Q. That wasn't the question, Mr Taylor. You actually began,
8 according to your testimony, meeting with Sam Bockarie in
9 September 1998, correct?

12:09:50 10 A. That is correct.

11 Q. Now, Mr Taylor, when you said that you were surprised by
12 the situation in January 1999, in fact you had been well informed
13 about that situation. Isn't that correct?

14 A. That is not correct.

12:10:07 15 Q. And, indeed, the satellite phone that you had given to Sam
16 Bockarie was used to keep you up to date on the advances the
17 rebels were making in Sierra Leone. Isn't that correct,
18 Mr Taylor?

19 A. That's total nonsense. That's really twisted logic. Total
12:10:25 20 nonsense. No.

21 Q. Now, Mr Taylor, you also had advance knowledge about this
22 attack on Freetown because of a broadcast from the BBC in
23 December 1998, correct?

24 A. What is correct? What's your question?

12:10:51 25 Q. You had knowledge about an advance attack on Freetown
26 because of a BBC broadcast in December 1998, correct?

27 A. I'm not aware of a BBC broadcast in December 1998 that
28 talked about - nobody briefed me of an attack on Freetown, no.

29 Q. And you were also aware of a call by the United Nations

1 security general for the rebels to lay down their arms and this
2 call was made by the United Nations security general in December
3 1998, correct, Mr Taylor?

4 A. Do you mean Secretary-General, counsel?

5 Q. United Nations Secretary-General.

6 A. Okay. I think you said security general.

7 Q. Excuse me, Mr Taylor, if I misspoke. United Nations
8 Secretary-General, Mr Taylor, expressed --

9 A. If I was aware that what again?

12:11:47 10 Q. That he expressed his concern in late December 1998 about
11 the events in Sierra Leone. You were aware of that, weren't you,
12 Mr Taylor?

13 A. Yes. I've told this Court I was aware of the fighting.
14 Everybody was concerned about the fighting, yes.

12:12:03 15 Q. And, Mr Taylor, you were aware that on 27 December, a
16 spokesman speaking on behalf of the Secretary-General of the
17 United Nations appealed to the rebels to lay down their arms and
18 join the peace process. You were aware of that, yes, Mr Taylor?

19 A. Not specifically, but that's a possibility that he made
12:12:28 20 such a - I was not specifically aware of the spokesman's
21 statement. But I know that many statements were coming out
22 because of the heavy fighting in December that people should
23 return to the peace process, generally, so it would not be
24 unexpected that the spokesman would have said that.

12:12:44 25 Q. But, Mr Taylor, a pronouncement by the Secretary-General in
26 relation to the events in Sierra Leone, that would have been
27 important to you as the point President for peace, would it not?

28 A. It would have been important, yes.

29 Q. So you would have been aware of that, would you not,

1 Mr Taylor?

2 A. Not every announcement coming out by the spokesman of the
3 Secretary-General would be - reach me. I'm not disputing it, but
4 I'm trying to say to you that it could have very well come out
12:13:12 5 and it would have just been another issue by the special
6 representative - excuse me, the spokesman in New York that would
7 make several statements.

8 Q. Mr Taylor, you were aware that on 27 December, on behalf of
9 the Secretary-General, that spokesman expressed the
12:13:31 10 Secretary-General's extreme concern about the latest news of
11 rebel armed activities in Sierra Leone. You were aware of that,
12 were you not?

13 A. Not definitely. Not definitely. That's not to say it
14 didn't happen, but no one came and told me, "Oh, Mr President,
12:13:47 15 guess what? The spokesman of the Secretary-General just got up
16 and said this, XYZ." No, it would not work that way. No, I'm
17 not specifically --

18 Q. So you weren't briefed on that, that's your story?

19 A. That's my evidence.

12:13:57 20 Q. Mr Taylor, you were aware, were you not, that the
21 Secretary-General condemned the refusal of the RUF and junta
22 remnants to lay down their arms, as well as their continuing
23 military actions?

24 A. That's very possible. That may not have - I don't recall
12:14:16 25 being told about it but it would be something that the
26 Secretary-General would do.

27 Q. If we could please look at tab 15 in annex 2B. It should
28 be a Kofi Annan statement dated December 1998. We see here,
29 Mr Taylor, that it is dated 28 December 1998 and indicates that

1 it is a press release SG/SM6852 AFR/123 and the title is
2 "Secretary-General appeals to rebels in Sierra Leone to lay down
3 arms and join peace process without preconditions", 1998/12/28.
4 Then it indicates that the following statement was issued on 27
12:16:50 5 December by the spokesman for Secretary-General Kofi Annan and
6 indicates, "The Secretary-General is extremely concerned by the
7 latest news of rebel armed activities in Sierra Leone." See
8 that, Mr Taylor?

9 A. I see what you are reading.

12:17:08 10 Q. And in that statement:

11 "Condemned the refusal of the Revolutionary United Front
12 and junta remnants to lay down their arms as well as their
13 continuing military actions."

14 Do you see that?

12:17:22 15 A. I see what you just read.

16 Q. "And emphasised the unacceptability of attempting to
17 overthrow duly elected governments by force." So, Mr Taylor, you
18 were certainly briefed about this expression of concern by the
19 Secretary-General?

12:17:41 20 A. No.

21 Q. That's really the truth, isn't it, Mr Taylor?

22 A. No. Not every statement released out of New York - every
23 President is concerned about every statement by the - no. I was
24 not - I don't dispute the statement but --

12:17:57 25 Q. Even here, Mr Taylor, toward the end of December, you being
26 aware of fighting in Sierra Leone and advances toward the
27 capital?

28 A. Ms Hollis, no.

29 Q. You weren't made aware of this?

1 A. No, Ms Hollis.

2 Q. That's just not correct, is it, Mr Taylor?

3 A. It's very correct. A statement issued by a spokesman for
4 Secretary-General Annan in New York when many come out on a daily
12:18:20 5 basis, not everybody is even concerned with some of these
6 statements coming out of there. I mean this was not - no.

7 MS HOLLIS: If we could ask that that be marked for
8 identification, Madam President, as a separate MFI.

9 PRESIDING JUDGE: Yes, this document entitled "Kofi Annan
12:18:38 10 statement of Sierra Leone" on 29 December 1998 is marked MFI-336

11 MS HOLLIS:

12 Q. Now, Mr Taylor, again going back to the BBC report, you
13 were well aware of the late December BBC report indicating that
14 the rebels were saying they were poised for an attack on

12:19:20 15 Freetown. You were aware of that report, were you not,
16 Mr Taylor?

17 A. In late December 1998?

18 Q. Yes. A BBC Focus on Africa report, Mr Taylor?

19 A. I don't recall being - the BBC reports every day. Every
12:19:37 20 day Focus on Africa. I did not hear this particular report and I
21 don't recall somebody coming and telling me, "Guess what? The
22 rebels are saying that they're going to attack Freetown," no.

23 Q. Mr Taylor, in light of the fact that in December we had
24 this ongoing fighting, this advance toward Freetown, you were
12:19:58 25 briefed about this BBC report, were you not, Mr Taylor?

26 A. No, I was not. The BBC reports a lot of things that are
27 not true, so they never told me.

28 Q. In fact, Mr Taylor, this report talked about a United
29 Nations Security Council condemnation of the recent upsurge in

1 rebel attacks in Sierra Leone, didn't it, Mr Taylor?

2 A. I have just told you I was not briefed about the report so
3 I don't know what it said. I don't know what the report said.

12:20:34

4 Q. Mr Taylor, as point President for peace you would have been
5 briefed on a report of this nature. Isn't that correct?

6 A. Not necessarily. If the Security Council had issued a
7 statement I would have been briefed about the Security Council
8 statement, not specifically a BBC report.

12:20:53

9 Q. Mr Taylor, the people who were responsible for briefing
10 you, they followed BBC Focus on Africa broadcasts, did they not?

11 A. I would assume they did.

12:21:39

12 Q. If we could turn to tab 14 in annex B there is an
13 unofficial transcript of a BBC Focus on Africa broadcast of 30
14 December 1998. Now, in addition to this unofficial transcript,
15 we have provided Madam Court Officer with an extract from that
16 Focus on Africa broadcast relating to the United Nations Security
17 Council condemnation. I understand we may have some difficulty,
18 however, playing that extract?

12:22:14

19 MS IRURA: Your Honour, we did a brief check over the break
20 and we were not getting any sound, because it's an audio file.
21 So we wanted to repeat our check over the lunch break when the
22 technicians are available, or when they would be able to actually
23 come and see what is the problem with the clip.

12:22:39

24 PRESIDING JUDGE: I've not had my headphones on, but now I
25 put them on and I hear absolutely nothing through the headphones.
26 Is it just me? And I can't get a single channel to display.

27 MS HOLLIS: My colleague is able to hear through his
28 headphones, so --

29 PRESIDING JUDGE: Thank you. Are you able to proceed?

1 MS HOLLIS: Yes, I will move on from that and proceed,
2 Madam President. If we work that out, I will return to that:

3 Q. Mr Taylor, you were aware of other reports in December 1998
4 dealing with atrocities that were ongoing in Sierra Leone,
12:24:12 5 correct?

6 A. When you say I was aware of other reports what report are
7 you referring to, Ms Hollis?

8 Q. There were many reports, were there now, in December 1998,
9 Mr Taylor?

12:24:19 10 A. Which one are you referring to? Which one are you
11 referring to?

12 Q. Mr Taylor, the question is: You were aware of other
13 reports in 1998, in December 1998, dealing with atrocities being
14 committed in Sierra Leone, were you not?

12:24:30 15 A. Well, I was briefed of reports by ECOMOG that there were
16 atrocities going on in that December month.

17 Q. But, Mr Taylor, in addition to your ECOMOG briefings, your
18 briefings by your personnel also included reports of atrocities
19 being committed in Sierra Leone. Isn't that correct?

12:24:54 20 A. In December, yes, I was told that ECOMOG was reporting that
21 there were atrocities during the fighting.

22 Q. And, Mr Taylor, you were briefed on a report about rebels
23 beheading men and women and chopping arms off of others including
24 children in a small village called Alikalia, were you not,
12:25:26 25 Mr Taylor?

26 A. No. I don't - no. The reports that came to me, for the
27 benefit of the Court, was not specifically stating names of towns
28 and villages. It was a general report that ECOMOG is reporting
29 atrocities during the fighting. There was no specific town or

1 village that was given to me.

2 Q. Now, Mr Taylor, reports that would include beheading of
3 men, women and chopping arms off of others including children,
4 that would be very important for you to know as the point

12:25:59 5 President for peace, would it not, Mr Taylor?

6 A. It would be important for me to know if there are
7 atrocities going on in Sierra Leone, yes.

8 Q. Indeed, you were made aware of that particular report, were
9 you not, Mr Taylor?

12:26:12 10 A. Well, I was aware by ECOMOG's reports that there were
11 atrocities I have said.

12 Q. And not just by ECOMOG reports. That's correct, is it not,
13 Mr Taylor?

14 A. No, my adviser advised me that there were ECOMOG reports of
12:26:27 15 atrocities.

16 Q. Mr Taylor, you were also made aware that these beheadings
17 and mutilations that we've just talked about were in retaliation
18 for the death sentence against Foday Sankoh?

19 A. That is not correct. No one told me that, "Guess what,
12:26:48 20 Mr President? We are being told that there are beheadings going
21 on because of Foday Sankoh." No, no, no, no. I was informed
22 that ECOMOG was reporting that rebels in Sierra Leone were
23 carrying out atrocities. In fact, let me be very clear. As to
24 the specific nature, no one detailed there were heads cut off and
12:27:09 25 hands cut off. There was a general report of beheadings and
26 rapes and different things. But specifically detailing, that was
27 not what I received.

28 Q. That's just not true, is it, Mr Taylor?

29 A. Very true. Nobody came to me to tell me that.

1 Q. Because these type of crimes being committed in retaliation
2 for the death sentence against Foday Sankoh, that information
3 would be very important to you, wouldn't it?

4 A. The fact that it's important didn't mean that I was told.
12:27:36 5 It would be important, yes.

6 Q. Mr Taylor, your people who were briefing you were aware
7 that that would be important, won't they?

8 A. I wouldn't know what they were aware of. I am only
9 reporting to these judges what I was told.

12:27:46 10 Q. Mr Taylor, you made them aware of what types of information
11 you wanted to receive, did you not?

12 A. I've answered that question before. I have told you I
13 don't brief my council; they brief me.

14 Q. Well, we suggest that indeed you were briefed on this
12:27:57 15 incidents and were aware of it?

16 A. Your suggestion is wrong.

17 Q. Now if we could look at tab 16 in annex 2B, please. If we
18 could first look at the cover page, please. And you see,
19 Mr Taylor, this is New African magazine?

12:29:07 20 A. This is New African.

21 Q. And if we could look at the next page, please. At the
22 bottom of that page it should show itself as page 24, New
23 African, December 1998. Could we see the bottom of that page,
24 please. New African, December 1998. And then if we look at the
12:29:50 25 photograph at the top and the caption underneath, "The RUF is
26 still active in the bush and taking its terrible revenge." And
27 we see the title of the article is "Nigerians Execute Sierra
28 Leonean Couplist". Now, if we could move to the bottom of that
29 page, please, and see the portion that is marked on the far right

1 column, the last paragraph:

2 "But news of Sankoh's death sentence immediately provoked
3 retaliation by the RUF rebels who beheaded several men and women
4 and chopped the arms off others including children in a small
12:30:41 5 village called Alikalia. The rebels told the survivors that the
6 killings were in retaliation for the death sentence passed
7 against Sankoh. The bloody war continues."

8 Now, Mr Taylor, you were briefed on this article in New
9 African magazine in December 1998, weren't you?

12:30:59 10 A. No.

11 Q. Because as a point President for peace it would be very
12 important that you be aware of this, Mr Taylor.

13 A. The whole archives of the world I'm aware of. I'm not
14 aware of this.

12:31:13 15 MS HOLLIS: If we could ask that that be marked for
16 identification. It would be the cover page and the page 24 that
17 we have referred to.

18 PRESIDING JUDGE: The pages of this article mentioned are
19 marked as MFI-337.

12:31:35 20 MS HOLLIS: Thank you, Madam President:

21 Q. Mr Taylor, these pronouncements by Sam Bockarie of killing
22 every living thing including chickens, this article about the RUF
23 beheading and amputating, these were not actions that would have
24 been carried out under the command of a man who was interested in
12:32:16 25 peace, were they?

26 A. I don't know how to answer that, Ms Hollis.

27 Q. It's quite simple, Mr Taylor. Saying that you are going to
28 destroy every living thing including chickens, that's not
29 consistent with being committed to peace, is it, Mr Taylor?

1 A. Well, like I said, I don't know how to answer that. It's a
2 subjective question. I don't know how to answer that, really.

3 Q. You don't know how to answer that?

4 A. No.

12:32:41 5 PRESIDING JUDGE: Mr Taylor, yes, it is a subjective
6 question, but she is asking for your opinion subjectively.

7 THE WITNESS: Okay. Well, anyone doing that I could say
8 would not be someone that I'm not sure would not be interested in
9 peace, but I would just categorise it as someone that was doing
10 something that was totally wrong. People have done terrible
11 things but still interested in peace, so to try to answer you,
12 counsel --

13 MS HOLLIS:

14 Q. And, Mr Taylor, beheading people, men, women, and
12:33:30 15 amputating people, including children, that would not be
16 consistent actions by somebody who is supposedly interested in
17 peace, would it, Mr Taylor?

18 A. It's horrific. It's horrific. I'm not sure I would agree
19 with the proposition. It's horrific. It's terrible. It's
12:33:57 20 inhumane. But when I look at your question, I cannot agree with
21 the proposition of the question.

22 Q. So you can't agree that such action would be inconsistent
23 with someone who is supposedly committed to peace?

24 A. People have committed terrible crimes. No. People commit
12:34:17 25 terrible crimes and still have peace, so your proposition - I
26 would disagree as the proposition is posed.

27 Q. Now, Mr Taylor, in early January 1999 - 4 January to be
28 exact - you were aware of a BBC broadcast giving news from Sierra
29 Leone refugees in Guinea, weren't you?

1 A. I can't recall that BBC report, no.

2 Q. And in that BBC broadcast on 4 January, you were aware
3 these refugees were talking about atrocities being committed by
4 rebels in Sierra Leone, weren't you, Mr Taylor?

12:34:54 5 A. I can't recall the specific. I'm aware of atrocities, like
6 I said, based on the ECOMOG reports, but as to these refugees in
7 Guinea and what they said, I'm not - I can't recall anybody
8 briefing me about what the refugees were saying in Guinea.

9 Q. So, Mr Taylor, you the point man for peace in Sierra Leone,
12:35:17 10 you are telling this Court that you were unaware of these many
11 pronouncements by Sam Bockarie in the fall and late 1999 and 1998
12 relating to his intentions to attack Freetown?

13 A. I'm telling this Court that the pronouncements that I
14 allege in the Sierra Leonean web page, what you have presented
12:35:46 15 before this Court, I'm not aware of those pronouncement by Sam
16 Bockarie.

17 Q. And you were - you are telling this Court you were unaware
18 of his pronouncements about killing all living things including
19 chickens --

12:36:02 20 A. That's exactly --

21 Q. -- if his conditions weren't met?

22 A. That's exactly what I have told this Court.

23 Q. So you were aware of none of those pronouncements?

24 A. I've said that.

12:36:14 25 Q. And you were unaware of these various specific articles
26 that we have referred to that talked about atrocities in Sierra
27 Leone?

28 A. Which articles? The Sierra Leonean - I'm not sure if they
29 are PS articles, but the documents that you have presented here

1 from the Sierra Leonean web page, I'm not aware of those
2 pronouncements as alleged by those papers.

12:36:51 3 Q. And your testimony is that your briefers never briefed you
4 about any threats coming from Sam Bockarie, September, October,
5 November, December, not even one. Is that what you are telling
6 these judges?

7 A. I'm telling these judges that I'm aware of fighting. I was
8 not aware of the little talk or whatever threats Sam Bockarie -
9 if Sam Bockarie had made any threats that I had been briefed of
12:37:07 10 when he came to Liberia, trust me, he would have heard from me.
11 Nobody told me that Sam Bockarie said he would go and shoot this
12 town up. I never got those briefings.

13 Q. Well, Mr Taylor, you knew all about it because you were
14 personally involved in all of it. Isn't that correct?

12:37:23 15 A. No, that's not correct.

16 Q. But in addition to that, if indeed you had been the point
17 President for peace, you would have known about it because these
18 things would have been critical to your efforts to secure peace
19 in Sierra Leone. Isn't that correct, Mr Taylor?

12:37:35 20 A. That is not correct. I had as much knowledge of this as
21 the chairman of ECOWAS and other members of the committee. No,
22 that's not correct.

23 Q. Now, Mr Taylor, you have indicated to this Court that after
24 the Freetown invasion your supposed role as point President for
12:37:58 25 peace in Sierra Leone continued, correct?

26 A. That is correct.

27 Q. And you would have the judges believe that you talked to
28 Sam Bockarie to try to encourage peace after this invasion began
29 on 6 January 1999, correct?

1 A. Of course I did.

2 Q. Now, Mr Taylor, you knew even when you were talking to Sam
3 Bockarie in January 1999 - first of all, you knew about all of
4 his previous pronouncements. Isn't that right?

12:38:35 5 A. I've said no, Ms Hollis.

6 Q. But you also knew about his pronouncement on 8 January
7 1999, correct?

8 A. On the morning of - what was that? When was the invasion?
9 6, 7. I was briefed that the invasion had occurred and I was
10 briefed by my national security adviser that Sam Bockarie had
11 said, I think on the BBC - it must have been a day after. I'm
12 not exact - that the RUF had - or his boys, or something like
13 that, were in Freetown.

14 Q. Mr Taylor, they also briefed you, did they not, that Sam
15 Bockarie in an interview with BBC had ruled out any negotiations
16 with the civilian government? They told you that, didn't they?

17 A. What time? After the 7th? Or 6th?

18 Q. After the invasion began on the 6th.

19 A. No, they told me what he had said. They did not tell me
12:39:45 20 that he had ruled out anything. If not I would not have tried to
21 reach him, of which [overlapping speakers] got a ceasefire.

22 Q. Well, Mr Taylor, that would have been very important for
23 you to know, wouldn't it?

24 A. Of course it would have been important.

12:39:54 25 Q. And your briefers knew that, didn't they?

26 A. Of course.

27 Q. And so they told you about that interview, didn't they,
28 Mr Taylor?

29 A. I have said to you that they told me that Sam Bockarie said

1 his boys were in Freetown. As to the specific in that he was
2 ruling out, I don't recollect them telling me that he said he had
3 ruled out all - what did you say - negotiations with the civilian
4 government. I don't recollect them telling me that, no.

12:40:21 5 Q. Mr Taylor, they also told you that Bockarie had said that a
6 peaceful solution hinged on Sankoh's release. They told you
7 that, didn't they, Mr Taylor?

8 A. Following the attack on Freetown, yes.

9 Q. In fact, while the attack was ongoing, correct, Mr Taylor?

12:40:39 10 A. No. No. No. The date in question that you asked me about
11 is the 8th or thereabouts. Not on the day of the morning or so
12 of the coup. No.

13 Q. The morning of the coup, Mr Taylor?

14 A. I didn't mean to say coup. Invasion, excuse me.

12:40:59 15 Q. Mr Taylor, on 6 January is when the invasion began, but the
16 fighting continued much past that. Isn't that correct,
17 Mr Taylor?

18 A. That is correct.

19 Q. And they also told you that Sam Bockarie said, "There's no
12:41:10 20 ceasefire. We will take the rest of the city and save our
21 country. We do not recognise Kabbah. We will not talk to
22 Kabbah. He is ousted." They told you about that; isn't that
23 correct, Mr Taylor?

24 A. I don't recollection the entire report, but what I can say
12:41:28 25 to these judges is that they did inform me that Sam Bockarie had
26 been on the BBC. He made several statements, including that his
27 boys were in Freetown. Now, I don't know what the full extent of
28 his statements were, but it was - they appeared to have been very
29 belligerent, so I don't rule out that Sam Bockarie could have

1 said that. What I was reported, I can't recall the full context,
2 but what I want these judges to understand that it was reported
3 to me after the invasion about some statements that Sam Bockarie
4 had made.

12:42:02 5 Q. And they also told you that Foday Sankoh - that Sam
6 Bockarie said he had not listened to Sankoh's appeal for a
7 ceasefire. They told you that, didn't they, Mr Taylor?

8 A. I don't recall that part. I don't have any recollection of
9 that specific statement you just made.

12:42:18 10 Q. Well, that would be very important for you to know,
11 wouldn't it, Mr Taylor?

12 A. Probably, but I'm saying I don't recollect that statement.

13 Q. Now, Mr Taylor, you're aware that there was a public
14 announcement about 9 January 1999 that Britain had dispatched the
12:42:47 15 Royal Navy frigate HMS Norfolk to the Sierra Leone region, yes?

16 A. I don't recall the correct date. I do remember that
17 announcements were made that Britain was getting involved and
18 would dispatch a ship, but I don't remember the exact date,
19 counsel.

12:43:08 20 Q. And that its mission was to monitor events. You remember
21 that, Mr Taylor?

22 A. I'm not sure if - I just know that Britain was sending a
23 unit out to Sierra Leone to - I'm not sure if they say to
24 monitor. I don't remember the exact language, but there were
12:43:27 25 pronouncements that Britain was getting involved at some level.

26 Q. Mr Taylor, that announcement was made by the British
27 Ministry of Defence. Do you recall that?

28 A. No. I mean, like I'm saying to you, counsel, I'm trying to
29 understand this. The reports were made. I don't listen to the

1 British Defence secretary speaking.

2 Q. But you would have been briefed on that, would you not,
3 Mr Taylor?

4 A. I was told by my national security adviser that the British
12:43:59 5 - this was of interest to Liberia - that the British were sending
6 out an expeditionary force, or something, out to Sierra Leone.
7 Of course it would be of interest. They informed me.

8 Q. If we could look at tab 18 in annex 2B, Sierra Leone Web -
9 Sierra Leone News, January 1999. If we could first look at the
12:44:59 10 top of page 1. We see, "Sierra Leone Web - Sierra Leone News,
11 January 1999" and the date 9 January. Now if we could turn,
12 please, to page 2 of that document. If we could look at the
13 marked paragraph:

14 "Britain has dispatched the Royal Navy frigate HMS Norfolk
12:45:42 15 to the Sierra Leone region, a Ministry of Defence spokesman said
16 on Saturday. The ship will be monitoring events, the spokesman
17 said."

18 Then if we go farther down, "The Norfolk is expected to
19 arrive in the area next week."

12:45:57 20 Now that you have seen that, you recall being briefed on
21 that about the 9th of January, Mr Taylor, of 1999?

22 A. Like I said, I don't remember the exact date but I'm
23 telling these judges I received a briefing that the British were
24 sending a warship. I don't remember the date that my national
12:46:19 25 security adviser told me, but I can remember being told that the
26 British were sending a ship into the area.

27 Q. Mr Taylor, do you remember Sam Bockarie telling the BBC
28 that he had intelligence reports that the Norfolk was planning to
29 land British mercenaries in Freetown?

1 A. Sam Bockarie's statements I don't - no, I was not told
2 that.

3 Q. That would be important to you, wouldn't it, Mr Taylor?

12:46:48

4 A. Why would every statement that Sam Bockarie make be
5 important to me? No.

6 Q. Mr Taylor, he was the on the ground commander of the RUF in
7 Sierra Leone?

8 A. I was the - I was on the ground?

9 Q. This was a time when - no, Mr Taylor, he, he.

12:47:02

10 A. I thought you said "you were".

11 Q. Sam Bockarie was the on the ground commander of the RUF in
12 Sierra Leone?

13 A. Yes.

12:47:17

14 Q. And Freetown had been attacked beginning 6 January. So Sam
15 Bockarie's pronouncements would be important to you, correct?

16 A. Ms Hollis, Sam Bockarie telling somebody I received
17 intelligence reports would not be important to me. And I don't
18 think my national security council would waste time to even
19 brief, because these briefings are very short, maybe 2, 3 pages -
20 would waste time to say about some intelligence that Bockarie -
21 that would not be important.

12:47:39

22 Q. And, Mr Taylor, you also would have been briefed that Sam
23 Bockarie threatened retribution should that take place. Isn't
24 that correct, Mr Taylor?

12:47:57

25 A. I was not told that, Ms Hollis. I'm sorry, I was not.

26 Q. Mr Taylor, these intelligence sources that gave Sam
27 Bockarie this information, were those your intelligence sources?

28 A. I don't even know, Ms Hollis, if anybody told Bockarie or
29 what. How would my intelligence agency inform - no. No,

1 Ms Hollis, no.

2 Q. You indeed were passing information on to Sam Bockarie
3 throughout all phases of this operation?

4 A. No, Ms Hollis.

12:48:30 5 Q. And it would have been important for you to know about the
6 Norfolk coming into the area and to pass that on to Sam Bockarie.
7 Isn't that correct, Mr Taylor?

8 A. It had already been announced by the British defence
9 secretary so what would I pass? I mean, it's illogical to say
10 that.

11 Q. And, Mr Taylor, any purposes that you believed this British
12 presence would have, it would be important for you to pass those
13 on to Sam Bockarie. Isn't that right?

14 A. That is not correct.

12:48:58 15 Q. So the basis of his pronouncement about the Norfolk
16 planning to land British mercenaries, that was based on
17 information provided by you or your representatives. Correct?

18 A. That is incorrect.

19 Q. And at this time with this attack on Freetown it would have
12:49:20 20 been important for you to know that Sam Bockarie had threatened
21 retribution should the Norfolk land these people. Isn't that
22 correct?

23 A. No, Ms Hollis.

24 Q. Mr Taylor, had you ordered Sam Bockarie to retaliate should
12:49:35 25 the Norfolk land these personnel?

26 A. No, Ms Hollis.

27 Q. Had you advised him to do that?

28 A. No, Ms Hollis.

29 Q. That's not really true, is it, Mr Taylor?

1 A. That is very true, counsel.

2 MS HOLLIS: Madam President, if we could ask that these two
3 pages, page 1 and 2 for 9 January be marked next in line of 334
4 and I believe that would be G.

12:50:17 5 PRESIDING JUDGE: The pages referred to are marked 334G.

6 MS HOLLIS:

7 Q. Now, Mr Taylor, you were also aware after this attack had
8 begun that Sam Bockarie had also threatened that the RUF would
9 make Sierra Leone ungovernable unless the movement was given a
10 share of power. You were made aware of that, were you not,
11 Mr Taylor?

12 A. No, I was not.

13 Q. Indeed it was very important that you would know this.
14 Isn't that true, Mr Taylor?

12:51:02 15 A. If what is true? That it would be important for such a
16 statement to be told to me?

17 Q. It would be very important for you to know that. Isn't
18 that right, Mr Taylor?

19 A. If Sam Bockarie had threatened to make Sierra Leone
12:51:14 20 ungovernable that would be important for everyone to know, yes.

21 Q. And you knew that, didn't you, Mr Taylor. You knew about
22 that pronouncement?

23 A. No, I did not.

24 Q. And you knew that he had indicated no government could
12:51:28 25 rule, they would make the country ungovernable?

26 A. No.

27 Q. Yes, Mr Taylor?

28 A. I did not know that Sam Bockarie had made that statement,
29 no.

1 Q. Now, Mr Taylor, as the point President for peace, you would
2 have been made aware of such a statement by Sam Bockarie. Isn't
3 that true?

12:51:50

4 A. You know again the way your proposition is put, as point
5 President for peace it would be important for important things to
6 reach to me, but the issue is I was not told that Sam Bockarie
7 had made that threatening statement.

8 Q. And indeed you were briefed on that. Isn't that correct?

9 A. You've got my answer. I have said no.

12:52:06

10 Q. But, Mr Taylor, perhaps in addition to being briefed on
11 that, you were also told that directly by Sam Bockarie?

12 A. No.

13 Q. Now, Mr Taylor, during the invasion itself were you aware
14 of any threats that were made by Sam Bockarie?

12:52:32

15 A. During the invasion?

16 Q. Yes?

17 A. No.

18 Q. So, as the point President for peace, you are saying you
19 were not aware of any threats made by Sam Bockarie during this
20 invasion in January 1999?

12:52:41

21 A. I'm interpreting "during the invasion" as the date that it
22 occurs. I have told this Court that following a day or two there
23 were threats that Sam Bockarie made that my council briefed me.

24 So if during means the entire period of the fighting, then I

12:53:01

25 would say I was aware of threats that he made. When you say
26 during the invasion, taking the entire period into consideration,
27 because fighting lasted for a few days, and by the 7th, 8th, I'm
28 not too sure, my council did inform me that Sam Bockarie had said
29 his boys were in Freetown and I don't remember the exact words

1 but that threats were made about certain things. Now if "during"
2 means those days, I was aware.

3 Q. But you are telling the Court that you have no recollection
4 of being briefed as to a later statement by Sam Bockarie about
12:53:35 5 making Sierra Leone ungovernable?

6 A. A later statement by what time are you talking about?

7 Q. Well, Mr Taylor, later in January, Mr Taylor?

8 A. Well, later in January I'm not sure because I secure a
9 ceasefire in January. So I don't recall anybody telling me that

12:53:58 10 Sam Bockarie following my securing the ceasefire had made those
11 threats because I get that ceasefire before the end of January.

12 And to remind the judges, Foday Sankoh - Kabbah makes arrangement
13 for Foday Sankoh to speak to some of the individuals during that
14 particular time. So I do not recall anyone telling me that Sam

12:54:21 15 Bockarie is continuing with these by the end of January, no. I
16 don't recall that.

17 Q. If we could please look at tab 19 in annex 2B. This is
18 Sierra Leone Web - Sierra Leone News, 1999, page 1 of 2, 26
19 January. We see this is 26 January. Then if we could move down
12:55:33 20 to the marked part of that page:

21 "RUF commander Sam Maskita Bockarie threatened Tuesday that
22 the RUF would make Sierra Leone ungovernable unless the movement
23 was given a share of power. 'No government can rule. We'll make
24 the country ungovernable,' he said. 'We are demanding a
12:55:51 25 political role.' Bockarie said ECOMOG troops would be unable to
26 provide security for the Sierra Leone government. 'We are
27 negotiating the liberation of RUF leader Corporal Foday Sankoh
28 and we want a new government of inclusion,' he said. 'No
29 government can succeed in this country if it doesn't include

1 Foday Sankoh.' Bockarie ridiculed ECOMOG claims to have
2 'trapped' rebels southeast of Freetown. 'Can you trap a rebel in
3 the bush?' he asked."

12:56:28 4 Mr Taylor, you were certainly briefed about that threat to
5 make Sierra Leone ungovernable later in January, were you not,
6 Mr Taylor?

7 A. From which source? Who is reporting this? No. I have
8 obtained a ceasefire by mid-January and whatever - this is not
9 coming - I'm not sure, what source is this? I did not get this,
12:56:52 10 to be short.

11 Q. Mr Taylor, it would be even more important that you know
12 about this statement by Sam Bockarie if you had negotiated the
13 ceasefire. Isn't that correct?

14 A. If he had made such a statement I'm sure it was something I
12:57:02 15 would be interested in, since he had agreed to a ceasefire and I
16 had announced it and everyone was happy about it, the United
17 Nations, ECOWAS, and, by the way, nobody asked why is Charles
18 Taylor involved? So I would be - this would be of interest to me
19 if he had - if he was reneging, because this would constitute
12:57:19 20 reneging on his acceptance of a ceasefire. Yes, it would be of
21 interest to me.

22 Q. And not only of interest, but you were aware of it. Isn't
23 that correct?

24 A. I was not aware of this bellicose statement on the part of
12:57:30 25 Sam Bockarie because I would have jumped in again and said, "But
26 what are you talking about? You just agreed to a ceasefire."
27 No.

28 MS HOLLIS: Madam President, if we could mark that next in
29 order of 334. I believe that would be H.

1 PRESIDING JUDGE: That's correct. The document is marked
2 MFI-334H.

3 MS HOLLIS:

4 Q. Mr Taylor, really your testimony that you were unaware of
12:58:07 5 all these pronouncements, you were unaware of specific reports of
6 atrocities and details of atrocities, none of that testimony has
7 been the truth, has it, Mr Taylor?

8 A. No, but you are misquoting my evidence. Based on that
9 question you are misquoting my evidence. I have not said I was
12:58:24 10 not aware of atrocities and reports - and reports --

11 Q. Specific details of atrocities?

12 A. Specific details of atrocities in terms of towns and
13 villages I was not - I was not briefed as such. I was aware of
14 atrocities, I have told this Court.

12:58:41 15 Q. Mr Taylor, your testimony that you were surprised by the
16 invasion of Freetown when it finally occurred on 6 January 1999,
17 that's not true either, is it?

18 A. That is 100 per cent true. 100 per cent.

19 Q. Now, Mr Taylor, during 1998 and through the Freetown
12:59:01 20 invasion, while you say you were the point President for peace in
21 Sierra Leone, many African leaders took a very different view of
22 your activities in Sierra Leone. Isn't that true?

23 A. I don't know what views they took. There were detractors,
24 but I remained with the process from 1997 throughout 2002. And I
12:59:31 25 worked hard and I was commended by my colleagues, including the
26 Secretary-General of the United Nations and everybody else. So I
27 would disagree with your proposition. Some may have.

28 Q. Indeed, Mr Taylor, your conduct relating to Sierra Leone
29 was condemned by many African leaders. Isn't that correct?

1 A. I don't know that as a matter of record. There were
2 disagreements. Some of the - in fact, I remember a particular
3 case where Jerry Rawlings had said that if - something to the
4 effect that if what was being reported was true, then that was
13:00:25 5 about my involvement was not true. I remember that being
6 reported to me. But to the extent that any colleagues in Africa
7 were concerned and condemned me, if I had been terrible they
8 would have asked me to leave the committee, no. So I disagree
9 with your proposition. There may have been one. I remember the
13:00:44 10 Rawlings case, but that's about all. And I don't even know if
11 Jerry said that.

12 Q. Mr Taylor, these condemnations were not accompanied by an
13 acknowledgement that you were the point President for peace for
14 Sierra Leone, were they?

13:01:00 15 A. Why would it be? That somebody said, "Well, you are the
16 point" - every peace movement from 1997 to 2002, Ms Hollis, the
17 President of the Republic of Liberia played a substantial role
18 and that was acknowledged by the international community.

19 Q. Mr Taylor, your substantial role was to continue the
13:01:23 20 conflict Sierra Leone. Isn't that correct?

21 A. No, Ms Hollis, that's totally incorrect.

22 Q. Now, Mr Taylor, after you became President of Liberia, many
23 West African leaders found you alarming. Isn't that correct?

24 A. Oh, that is totally incorrect.

13:01:41 25 Q. In fact, after you became President, many West African
26 leaders were worried about your regional ambitions. Isn't that
27 correct?

28 A. Totally incorrect.

29 Q. And those fears were heightened by your declaration that

1 Liberia had the most effective guerilla forces in Africa, weren't
2 they?

13:02:10 3 A. That's not the correct - I mean, you have to look at the
4 context that was made in and I don't think any President in West
5 Africa was afraid of little Liberia because of that. There's a
6 context of that particular statement that I'm not going to get
7 into right now, but that's incorrect. Your proposition is
8 incorrect.

13:03:17 9 Q. If we could please look at tab 21 in annex 2B. If we could
10 bring that down, please, "Africa Confidential". It shows 22
11 January 1999, volume 40, number 2. If we could move to the next
12 page, please. And this page, at the lower left-hand corner
13 should indicate page 2. If we could go down to see that. Now,
14 if we could move up to the article "West Africa, according to
15 Mr Taylor".

16 MR GRIFFITHS: Madam President, if it is proposed to read
17 into the record all of that portion which is contained in that
18 box, I would object to its use. In our submission, it goes to
19 guilt and the most that should be asked is, if one looks at the
13:04:17 20 third paragraph on the left where the defendant is alleged to
21 have made certain statements, in our submission, he can be asked
22 whether or not he made those statements and my learned friend is
23 bound by the answer. But, in our submission, the other
24 suggestions included in this paragraph go to guilt and should not
13:04:41 25 be admitted unless my learned friend can justify applying the
26 two-stage test that this is somehow admissible.

27 PRESIDING JUDGE: Ms Hollis, would you care to respond,
28 please?

29 MS HOLLIS: Thank you, Madam President. First of all,

1 Madam President, we are using this material to impeach this
2 accused's statements that we have just gone over about the
3 reaction of African leaders to this accused in his supposed role
4 that he has told you as point President for peace. We are of the
13:05:25 5 view that this article impeaches that and, indeed, impeaches his
6 denials that have just been put on the record. And we believe
7 that we should be allowed to use it for impeachment.

8 Now, the Defence counsel has indicated that certain
9 portions of this article go to guilt. And he has not pointed out
13:05:52 10 the exact portions that he is referring to, so it's a little
11 difficult for us to respond to those exact portions. I believe
12 he has said, from what I can understand, that anything other than
13 "Taylor recently boasted to journalists that Liberia has the most
14 effectively guerilla fighters in Africa," I believe he is saying
13:06:17 15 the rest of it goes to guilt. Now, that is not very exact, but
16 we would ask your Honours, first of all, to familiarise
17 yourselves with this, because much of the article has to do with
18 the reaction of African leaders to Charles Taylor not in a way to
19 show that he was the point President for peace but rather that
13:06:54 20 indeed he was doing anything but promoting peace.

21 And so we would suggest that the Defence counsel limiting
22 the impeachment part of this article to, if I'm correct, the
23 statement "Taylor recently boasted to journalists about the
24 guerilla fighters" is impermissibly narrow. And it would seem
13:07:18 25 that, to the extent your Honours found other portions to go to
26 impeachment, the Defence counsel would not be arguing against
27 their admission, because he is not arguing against the admission
28 of the article as a whole, but he is simply saying that other
29 than this one statement that he outlined, he thinks the rest of

1 it is probative of guilt.

2 Now, to the extent that your Honours wish us to address the
3 entire article in relation to it potentially being probative of
4 guilt, then we will do so. And we have had these discussions
13:07:56 5 with - in relation to other material before, but we will, for the
6 record, go back over the points we wish to make about the test
7 that is to be applied, when we believe it should be applied and
8 factors to look at.

9 First of all, we would suggest that the test does not apply
13:08:20 10 unless material is fresh evidence probative of guilt. So to the
11 extent your Honours were to determine that this is not probative
12 of guilt, then the test is not to be applied at all. And we
13 would suggest that much of this article is not probative of
14 guilt.

13:08:36 15 To the extent your Honours determine that it is probative
16 of guilt, we would point out that we are asking your Honours to
17 consider this article for impeachment purposes and not for proof
18 of guilt.

19 So to the extent your Honours determine that theoretically
13:08:54 20 this is probative of guilt, then there are two initial tests that
21 we have to meet according to the decision of this Trial Chamber
22 in order to use this article in the cross-examination of this
23 accused. That is, that it would be in the interest of justice
24 and that it would not violate the fair trial rights of this
13:09:12 25 accused to use this article.

26 The exceptional circumstances test does not apply until
27 such time, if any, that we were to tender this for admission, so
28 it would not apply at the "use" stage.

29 Let's deal, before we go into these two tests, interest of

1 justice and fair trial rights of the accused, with the point that
2 Defence counsel has again made, which would seem to indicate that
3 even where we have materials that would eventually be admitted
4 into evidence, that the Prosecution basically must abide by the
13:09:54 5 accused's answers to our questions.

6 PRESIDING JUDGE: Ms Hollis, I think you are going off on a
7 tangent here. The objection was based on this particular
8 document as it is. The objection is based on the content of the
9 document, and according to the Defence, that content is probative
13:10:15 10 of the guilt of the accused. Now, if you could confine your
11 submissions to this aspect and not draw in other hypothetical
12 documentation or material, I think we will not lose sight of the
13 important point here.

14 MS HOLLIS: We will certainly do that if directed. We
13:10:32 15 would point out, Defence counsel did make that point in his
16 submissions to you, that we are bound by the answers of the
17 accused. We have addressed that earlier, so we will move on to
18 the test as Madam President has indicated.

19 First of all, the interest of justice. And I'm speaking to
13:10:55 20 the interest of justice test in the situation we have now, that
21 is, we are asking your Honours to consider this document for
22 impeachment, not for proof of guilt. It is in the interest of
23 justice for your Honours to have all relevant information before
24 you. Indeed, Rule 89C indicates the Trial Chamber may admit any
13:11:24 25 relevant evidence, and that certainly would be evidence relevant
26 to impeachment. That rule is really subject to Rule 95 which
27 would render inadmissible any information that would bring the
28 administration of justice into serious disrepute. Now, Rule 95
29 restrictions would not apply here.

1 It is in the interest of justice for your Honours to admit
2 information that will assist this Trial Chamber in its
3 truth-seeking function. That includes information which is
4 relevant to impeachment. It is also in the interest of justice
13:12:03 5 that each party, not just the Defence, but each party's right to
6 a fair hearing be upheld, including the right of
7 cross-examination and effective cross-examination.

8 Counsel's questions certainly are not evidence, but where
9 relevant documents are marked for identification and then later
13:12:25 10 admitted into evidence, those documents may be considered when
11 your Honours determine what credibility, if any, to give to the
12 testimony of this accused and that would include impeachment
13 evidence such as is contained in this article.

14 If we're not allowed to even use the article, then there is
13:12:47 15 no possibility it would be admitted into evidence for impeachment
16 purposes, so your Honours would not have the information before
17 you and the Prosecution would be denied the right to use that
18 information when it is challenging the testimony of this accused
19 and what credibility you should ultimately give to that
13:13:07 20 testimony.

21 It is in the interest of justice where material may
22 theoretically be probative of guilt but is requested to be used
23 only for impeachment that such limited use be allowed. Such
24 limited use is a long recognised use in criminal trials even with
13:13:34 25 jury trials. And the principle that the Prosecution should put
26 on its proof of guilt during its case in chief is not applicable
27 where the information being used is asked to be considered by
28 professional judges for impeachment only.

29 It is certainly in the interest of justice to be able to

1 effectively test and challenge the evidence of a witness before
2 this Court, including the accused. This is for the benefit of
3 the fact-finder. This is not inuring to the benefit of a party
4 but for the benefit of the fact-finder, so that findings of fact
13:14:12 5 will be based upon tested evidence and may be therefore informed.

6 It is also in the interest of justice that a witness not be
7 able to lie with impunity or fashion untruthful evidence secure
8 in the knowledge that this evidence cannot be challenged with
9 fresh evidence relevant to impeachment. We would suggest that it
13:14:38 10 is not in the interest of justice to preclude the use of relevant
11 information because theoretically it could be probative of guilt
12 when the only purpose for which your Honours are being asked to
13 use the evidence is for the limited purpose of impeachment.

14 Now as to the fair trial rights of the accused. There is
13:14:59 15 no fair trial right of the accused to keep relevant information
16 from a fact-finder, especially where this material, though it may
17 be theoretically probative of guilt, is being requested for use
18 for impeachment only. An accused has no right to prevent the use
19 of impeachment materials which would enable the fact-finders to
13:15:30 20 adequately test the credibility of the witness's testimony,

21 including the accused as a witness. Nor is there any fair trial
22 right on the part of the accused to prevent or significantly
23 hamper the Prosecution's ability to effectively challenge the
24 testimony of Defence witnesses, including the accused. Nor is
13:15:54 25 there a violation of the general principle that the Prosecution
26 should put its evidence of guilt forward during its case in
27 chief, because you put on your case in chief at that time
28 relating to guilt. You only put on your impeachment case when
29 you have information that you wish to impeach. That is to say,

1 once the witness has testified and you are cross-examining that
2 witness.

3 So we would suggest, first of all, that significant parts
4 of this article go to impeachment only and should be considered
13:16:28 5 for impeachment only and that even if theoretically your Honours
6 would say that it could be probative of guilt, where the
7 Prosecution is seeking only to use it for impeachment that, if
8 these two tests are to be applied at all, the Prosecution has met
9 the showing for both of these tests.

13:16:59 10 PRESIDING JUDGE: Please give us a moment firstly to read
11 the article and then to confer with my colleagues.

12 [Trial Chamber conferred]

13 PRESIDING JUDGE: We are of the unanimous view that the
14 document that the Prosecution wishes to refer to first of all is
13:21:15 15 new, in that it was not a document tendered by the Prosecution
16 during its case in chief, and we do agree that with the exception
17 of the sentence that parts have agreed, "Taylor recently boasted
18 to journalists," et cetera, that sentence - with the exception of
19 that sentence which in our view is quite benign, the rest of the
13:21:43 20 article we're of the view contains material that is probative of
21 the guilt of the accused.

22 Now, in line with our decision of 30 November 2009 laying
23 down the guidelines, the two-fold criteria that is to be
24 satisfied before the Chamber will allow use of this article, we
13:22:10 25 are of the view that what we've heard does not convince us that:
26 One, it is in the interest of justice to pursue the use of this
27 document at this stage; nor that it would not violate the fair
28 trial rights of the accused. We therefore disallow the use of
29 this document, except for that one sentence that I have said is

1 benign.

2 MS HOLLIS:

3 Q. Now, Mr Taylor, looking at this article, you did in fact
4 boast to journalists that Liberia has the most effective guerilla
13:22:53 5 fighters in Africa, did you not?

6 A. [Microphone not activated].

7 Q. I apologise. Mr Taylor, if you will look at the beginning
8 of the third paragraph on the left column: "Taylor recently
9 boasted to journalists that Liberia has the most effective
13:23:40 10 guerilla fighters in Africa." You did make that boast, did you
11 not, Mr Taylor?

12 A. No, Dr Ellis is wrong. I have no recollection of - I think
13 this is just an opinion of Dr Ellis, who was an expert witness in
14 this case. I have no recollection of this thing. This is his
13:23:59 15 opinion.

16 Q. Mr Taylor, do you see an author listed on that - for that
17 article?

18 A. Africa Confidential - the evidence is before this Court -
19 is a production of Dr Stephen Ellis who testified as an expert in
13:24:12 20 this Court. That's Ellis's paper.

21 Q. Do you remember what position he said he held on that
22 paper, Mr Taylor?

23 A. Well, we didn't get into the details but this is a Stephen
24 Ellis production. He was an expert in this case.

13:24:27 25 Q. Mr Taylor, he didn't say he was the only person who worked
26 on Africa Confidential, did he, Mr Taylor?

27 A. Neither did he say he was not the only one.

28 Q. And he didn't say that he wrote all of the articles in
29 Africa Confidential, did he, Mr Taylor?

1 A. All I'm saying is that this is his opinion. To answer your
2 question, I do not have any recollection of making this
3 statement.

13:24:52

4 Q. Mr Taylor, he didn't say that he wrote all the articles in
5 Africa Confidential, did he?

6 A. He was not asked that, no.

7 Q. Didn't he indicate he was the editor of Africa
8 Confidential?

9 A. Dr Ellis is the editor of Africa Confidential, is he not?

13:25:08

10 Q. So, Mr Taylor, there's nothing to indicate that he wrote
11 this article, is there, Mr Taylor?

12 A. But who wrote the article?

13 Q. That's speculation on your part, isn't it, Mr Taylor?

14 A. But there's no author. To answer your question --

13:25:21

15 Q. Mr Taylor, it's speculation on your part, isn't it?

16 A. It's not speculation on my part. Africa Confidential is
17 the production of Stephen Ellis, an expert in this case, and this
18 is his opinion.

19 Q. And, Mr Taylor, you don't speculate, do you?

13:25:29

20 A. This is his opinion and I'm saying to you that I have no
21 recollection of making this statement. This is his personal
22 opinion.

23 Q. But, Mr Taylor, my question is show us where on there it
24 indicates that he wrote this?

13:25:40

25 A. Well, who wrote the thing? A blank document?

26 Q. Mr Taylor, you are the one alleging that it's his opinion
27 so show us where it says he wrote this?

28 A. There's evidence before this Court by Dr Stephen Ellis that
29 he is the publisher of Africa Confidential, except you deny that.

1 Q. He was the editor, correct? Correct, Mr Taylor?

2 A. What is correct, correct?

3 Q. He was the editor, correct?

4 A. Dr Ellis told this Court to the best of my recollection

13:26:11 5 that he is the publisher of Africa Confidential and he testified
6 as an expert and this document, this is his opinion, and I'm sure
7 maybe you could have asked him about this. But I have no
8 recollection of making this statement.

9 Q. Mr Taylor, you are saying that the sentence, "Taylor

13:26:34 10 recently boasted to journalists that Liberia has the most
11 effectively guerilla fighters in Africa," is a statement of
12 opinion?

13 A. No, I'm saying to you I have no recollection of making this
14 statement. And this entire document is an opinion of Ellis.

13:26:52 15 Q. And that's your speculation?

16 A. [Overlapping speakers].

17 Q. Correct, Mr Taylor?

18 A. I don't know what you want again, counsel. I've just
19 answered your question. I have no recollection of making this
13:27:03 20 statement.

21 Q. Now, Mr Taylor, it's true, is it not, that as early as
22 January 1998 Victor Malu stated the reason you did not want
23 Liberia to be used as a base of operations against the AFRC/RUF
24 junta was that you wanted to surround yourself with proteges in
13:27:35 25 neighbouring African states who would do your bidding. You
26 recall him saying that, don't you, Mr Taylor?

27 A. Well, not specifically but Victor Malu made many
28 statements. He could have very well said that. He made many.
29 We had problems, as this Court is aware, and he was removed

1 because of that. So he could have very well made such a
2 statement which would have been out of place for a general to
3 state.

13:28:09 4 Q. In fact, Mr Taylor, that statement by Victor Malu was
5 correct, was it not?

6 A. Totally incorrect. That's why he lost his job.

7 Q. He lost his job because you convinced your friend to recall
8 him. That's the truth of that, isn't it, Mr Taylor?

13:28:26 9 A. Well, not exactly. The whole attitude of the general - and
10 then again let me say Victor Malu subsequently became a good
11 friend of mine. His attitude on the ground was not compatible
12 with that of a general commanding ECOWAS forces and so I took the
13 appropriate action as President of Liberia, and I'm sure it was
14 prudent because his commander-in-chief General Abacha saw fit to
13:28:47 15 do so, so I'll leave it at that.

16 Q. In fact, Sani Abacha did that to appease you; not because
17 General Malu deserved to be recalled. Isn't that correct,
18 Mr Taylor?

19 A. I'm not - no, I can't say that. I can't speak to the inner
13:29:06 20 heart of Sani Abacha, I'm sorry.

21 Q. The newly elected President of Liberia arguing about his
22 sovereignty, they didn't want to have any more problems with you.
23 Isn't that right, Mr Taylor?

24 A. I can't speak to that, counsel. That would be subjective.

13:29:23 25 Q. So they were trying to appease you, isn't that correct?

26 A. I wouldn't say that. Abacha didn't have to do that. He
27 could have - he could have spoken to me and said, "I don't think
28 it's possible".

29 Q. Let's look, please, at tab 22 in annex 2B.

1 PRESIDING JUDGE: Ms Hollis, I think we have just about,
2 what? Two minutes.

3 MS HOLLIS: Perhaps it would be better to break now, Madam
4 President.

13:29:56 5 PRESIDING JUDGE: You would rather break now?

6 MS HOLLIS: Yes, Madam President.

7 PRESIDING JUDGE: We'll take a break and reconvene at 2.30.

8 [Lunch break taken at 1.29 p.m.]

9 [Upon resuming at 2.30 p.m.]

14:31:53 10 PRESIDING JUDGE: Good afternoon. Ms Hollis, please
11 continue.

12 MS HOLLIS: Thank you, Madam President:

13 Q. Mr Taylor, just before the luncheon adjournment we were
14 going to turn to tab 22 in annex 2B concerning statements by
14:32:10 15 Major General Victor Malu in January 1999 - 1998, I'm sorry. So
16 if we could turn to tab 22 in annex 2B, Sierra Leone Web-Sierra
17 Leone News-January 1998. We see it says 25 January at the top.
18 Mr Taylor, if we could move to that portion where there is a line
19 drawn next to it on the far right of the page:

14:33:05 20 "Former ECOMOG force commander Major General Victor Malu
21 told the Nigerian Vanguard newspaper Sunday that Liberian
22 President Charles Taylor had opposed ECOMOG using Liberia as a
23 base for its operations in Sierra Leone because he wanted to
24 surround himself with proteges in neighbouring African states who
14:33:27 25 would do his biddings."

26 So, Mr Taylor, that was the comment that Major General Malu
27 had to make about your conduct after he was no longer force
28 commander. Isn't that correct, Mr Taylor?

29 A. If what is correct? If he made the statement or he didn't

1 make the statement? What is correct?

2 Q. Well, Mr Taylor, you were aware that he had made that
3 statement, weren't you?

14:33:56

4 A. No, I was not aware that he made this statement to the
5 Vanguard, no.

6 Q. Were you aware that he made this statement?

7 A. I was not aware that he had made such a statement to the
8 Vanguard newspaper, no.

14:34:15

9 Q. Mr Taylor, as we discussed earlier, indeed, this statement
10 was correct, was it not?

11 A. If what statement was correct?

12 Q. The statement I've just read to you, Mr Taylor.

14:34:29

13 MR GRIFFITHS: Madam President, what in effect my learned

14 friend is seeking to do is to ask the witness to comment on an

15 opinion expressed by somebody else, because if one looks at the

16 context of that paragraph, really, it should read "Taylor had

17 opposed ECOMOG using Liberia as a base for its operations in

18 Sierra Leone because my view is that Taylor wants to surround

19 himself with proteges in neighbouring African states." That is

14:34:53

20 the real sense in which that passage should be read. And

21 question: To what extent can a witness be asked to comment on

22 such an opinion? It's the view of the maker of the statement.

23 But so far as this witness is concerned, it seems to us that he's

24 in no position to comment on that, save being asked were you

14:35:20

25 aware of such a view, but beyond that, he can't comment.

26 PRESIDING JUDGE: But I'm of the view that he can say

27 whether or not he agrees with the view.

28 Mr Taylor, can't you?

29 THE WITNESS: If she asked that question, your Honour, yes.

1 Excuse me by saying "she". If Ms Hollis asked that.

2 MS HOLLIS:

3 Q. Well, first of all, Mr Taylor, let's ask the question. Do
4 you agree with that statement?

14:35:53 5 A. I do not agree.

6 Q. Mr Taylor, that is a correct statement, is it not? It is
7 correct, is it not, that you opposed ECOMOG using Liberia as a
8 base for its operations in Sierra Leone because you wanted to
9 surround yourself with proteges in neighbouring African states
10 who would do your bidding? That's correct, is it not?

11 A. That is not correct.

12 Q. Now, Mr Taylor, in this statement of Major General Victor
13 Malu, he doesn't say anything about you being the point President
14 for peace, does he?

14:36:32 15 A. No, Victor Malu doesn't say that.

16 Q. And General Malu doesn't say, "You know, that's surprising
17 that Charles Taylor would act this way since he has been selected
18 to be the point President for peace." He doesn't say anything
19 like that, does he, Mr Taylor?

14:36:51 20 MR GRIFFITHS: Well, again, Madam President, it seems to us
21 that that comment is unfair. We have here extracts from a
22 statement made by General Victor Malu. We do not know the full
23 content of the interview he gave. So my learned friend's
24 question is based on the assumption that the remainder of the
14:37:10 25 comments made by Victor Malu could not have contained those
26 statements, but we don't know that.

27 PRESIDING JUDGE: Yes, Ms Hollis, I think you are asking a
28 hypothetical question that's not very useful in this context.

29 MS HOLLIS: Let me rephrase then, Madam President:

1 Q. Mr Taylor, these comments that we have here before us made
2 by Major General Victor Malu, those comments do not include any
3 reference to you as the point President for peace, do they?

14:37:48

4 A. These comments as I'm reading this paragraph, I don't see
5 that.

6 Q. And these comments don't contain anything to the effect
7 that it's surprising that you would conduct yourself in this way
8 since you're the point President for peace. They don't contain
9 any such language, do they, Mr Taylor?

14:38:01

10 A. That language is not in the paragraph.

11 MS HOLLIS: Madam President, if I could ask that this be
12 marked for identification, the 25 January Sierra Leone Web-Sierra
13 Leone News-January 1998, page 1 of 1, and believe that would be
14 MFI-334I.

14:38:28

15 PRESIDING JUDGE: That is correct. The document will be
16 marked MFI-334I.

17 MS HOLLIS:

14:38:50

18 Q. Now, Mr Taylor, we were earlier talking about Stephen Ellis
19 and you were talking about Stephen Ellis and his association with
20 Africa Confidential. Now, you recall the years during which
21 Stephen Ellis acted as editor of Africa Confidential, don't you,
22 Mr Taylor?

23 A. I do not recall the years.

14:39:05

24 Q. Well, you must recall. You recalled his testimony, yes,
25 Mr Taylor?

26 A. I cannot remember the exact details. I was just trying to
27 point out that he was associated with this and that he testified
28 here as an expert. Now, to the years, I don't remember the exact
29 details of the years and his full testimony. I remember that

1 part.

2 Q. Mr Taylor, you recall, don't you, that Dr Ellis testified
3 that he, during the years of 1986 to 1991, was the editor of
4 Africa Confidential?

14:39:38 5 A. I'm saying I don't recall the exact details of his entire
6 evidence, but I do recall, as I mentioned to this Court, his
7 association with Africa Confidential, as I told the judges.

8 Q. And, Mr Taylor, if we could look at 16 January 2008 at page
9 1404, perhaps. That should be, if I have it correct, 16 January
14:40:35 10 2008, page 1404. If we could move that page down, please, and if
11 we look at line 27, Mr Taylor. This is the testimony of
12 Dr Ellis.

13 "In 1986 I left Amnesty International and I got a job as
14 editor of the newsletter called Africa Confidential, and I
14:41:02 15 remained there until 1991."

16 And then he goes on to say in 1991 he came to the
17 Netherlands. Do you see that, Mr Taylor?

18 A. I see that.

19 Q. So he was editor of that newsletter from 1986 until 1991,
14:41:20 20 according to his testimony, yes, Mr Taylor?

21 A. According to his testimony, yes.

22 Q. Now if we, Madam President, could go back to tab 21 in
23 annex 2B, the Africa Confidential article, "West Africa according
24 to Mr Taylor", which is dated 22 July 1991. I did not ask that
14:41:45 25 that be marked for identification and I would do so. 1999. 22
26 July 1999.

27 PRESIDING JUDGE: This is the page that the Trial Chamber
28 objected to except for that one sentence?

29 MS HOLLIS: That is correct, Madam President.

1 PRESIDING JUDGE: And do you want to mark the cover page as
2 well?

3 MS HOLLIS: Yes, ma'am.

4 PRESIDING JUDGE: So that would be MFI-338.

14:42:29 5 MS HOLLIS:

6 Q. Now, earlier, Mr Taylor, we were talking about a BBC Focus
7 on Africa broadcast in late December of 1998 dealing with a
8 United Nations Security Council condemnation of the recent
9 upsurge in rebel attacks. Do you recall us talking about that
10 article, Mr Taylor?

14:42:55

11 A. Vaguely, yes.

12 Q. And you indicated that you are not aware of the BBC
13 broadcast?

14 A. Yes.

14:43:02

15 Q. And it was also put to you that the broadcast indicated the
16 rebels were saying they were poised for an attack on Freetown,
17 and you indicated you were not aware of that. Do you remember
18 that, Mr Taylor?

19 A. The BBC broadcast. I was not aware of the BBC broadcast.

14:43:22

20 Q. And at the time we had some difficulties in being able to
21 play the excerpt from that broadcast, number 14 in annex 2B, but
22 I believe now perhaps we are able to play that excerpt. Is that
23 right, Madam Court Officer?

24 MS IRURA: That's correct.

14:43:42

25 MS HOLLIS: So if we would look at tab 14 in annex 2B,
26 there is an unofficial transcription of the excerpt of that
27 broadcast indicating BBC Focus on Africa, clip from track 2,
28 30/12/1998. Track 2, Mensah BBC World Service at 17.05 Greenwich
29 Mean Time, Kwabena Mensah with Focus on Africa. So if at this

1 time we could play that extract, and perhaps Madam Court Officer
2 would tell us if we need to put our headphones on for this or
3 move to a particular button on the screen?

14:44:48

4 MS IRURA: Your Honour, the participants just need to put
5 on their headphones.

6 PRESIDING JUDGE: And does Mr Taylor have the excerpt of
7 the transcript before him?

8 THE WITNESS: Yes, your Honour, it's on the screen. It's
9 on the screen.

14:45:42

10 [Audiotape played to the Court]

11 MS HOLLIS:

12 Q. Now, Mr Taylor, this BBC Focus on Africa programme included
13 this reference to the United Nations Security Council
14 condemnation of the upsurge of attacks by rebels in Sierra Leone.

14:46:15

15 Now, you were briefed about that, were you not?

16 A. Briefed about what? What the Security Council said, or the
17 BBC report?

18 Q. The United Nations Security Council condemnation of the
19 upsurge of attacks by rebels in Sierra Leone. You were briefed
20 about that, were you not?

14:46:28

21 A. Yes, the United Nations always condemned these issues. I
22 was not aware of the BBC report on the matter, I said.

23 Q. Were you briefed on the United Nations Security Council
24 condemnation as a separate matter?

14:46:41

25 A. Yes, the United Nations Security Council condemnation, I
26 was briefed on it.

27 Q. And the statement adopted by the council calling on
28 countries supporting the rebels to stop interfering in Sierra
29 Leone's internal affairs, you were briefed on that as well?

1 A. Yes, that's United Nations - that's normal UN language.

2 Q. And the United Nations was referring to you there, were
3 they not?

4 A. That's not what the report said, Ms Hollis.

14:47:06 5 Q. Mr Taylor, that's not what I'm asking you. The United
6 Nations was referring to you there, were they not?

7 A. I cannot subjectively - I mean, objectively say here what
8 the United Nations was thinking when the report said they refused
9 to name any country. So what - I can't respond to that,

14:47:20 10 Ms Hollis.

11 Q. Now, Mr Taylor, you were certainly briefed, were you not,
12 that the BBC Focus on Africa report once again indicated that the
13 rebels said they were poised to attack the capital, Freetown.
14 You were briefed on that, were you not?

14:47:38 15 A. By whom, Ms Hollis? You're asking me --

16 Q. By the people briefing you, Mr Taylor?

17 A. No, they were not - nobody told me. The news that you just
18 played as far as the UN side is concerned, yes. I was not
19 briefed about a BBC report. I have said that five times already.

14:48:00 20 PRESIDING JUDGE: I don't think that is the - yes, I think
21 you're right. The answer does relate to the report.

22 MS HOLLIS: Now, I would ask, Madam President, at this time
23 that the clip itself and the unofficial transcript by marked for
24 identification as one exhibit, A and B.

14:48:39 25 PRESIDING JUDGE: The BBC clip on Focus on Africa will be
26 marked - the clip will be marked as MFI-339A and the unofficial
27 transcript as 339B.

28 MS HOLLIS:

29 Q. Now, Mr Taylor, Victor Malu was replaced as force commander

1 of ECOMOG by General Timothy Shelpidi, correct?

2 A. That is correct.

3 Q. And General Shelpidi also issued statements about your
4 actions in Sierra Leone. Isn't that correct?

14:49:30 5 A. I would suppose he did. I don't --

6 Q. And in fact, Mr Taylor, in December 1998 General Shelpidi
7 urged the UN not to take your denials of involvement seriously,
8 didn't he?

9 A. I don't know that. Maybe he did. Maybe he did.

14:49:58 10 Q. And, Mr Taylor, it would seem that General Shelpidi was not
11 aware of your role as point President for peace. Now, Mr Taylor,
12 the force commander of ECOMOG, whoever that would be after you
13 became President, would have been informed of your important role
14 as point President for peace, would he not?

14:50:33 15 A. They were informed.

16 Q. In fact they weren't, were they?

17 A. They were.

18 Q. Neither General Malu nor General Shelpidi were informed,
19 were they?

14:50:41 20 A. Very, very much aware. And as you posed the proposition
21 earlier you didn't solicit an answer so I didn't answer, but no
22 general in ECOMOG, knowing that I was a member of the Committee
23 of Five, would not know that I was involved with the peace
24 process, then he had to be a stupid general.

14:51:00 25 Q. Mr Taylor, we're not talking about some involvement for
26 show. We're talking about your testimony that you were the point
27 President for peace.

28 A. As far as I'm concerned, he should have known. Military
29 people normally stay out of civilian matters. So as to my role

1 in ECOWAS, I can't see why he would not have known my important
2 role as being the point person. I don't understand it.

3 Q. Well, Mr Taylor, he didn't know because you weren't in fact
4 the point President for peace. Isn't that correct?

14:51:31 5 A. Well, that is incorrect. I think my role throughout the
6 years as I have mentioned will verify the importance that I
7 played and my specific role is very clear.

8 Q. Now, do you recall an extraordinary meeting of the ECOWAS
9 Committee of Five that occurred on 28 December 1998?

14:52:06 10 A. December 28, 1998? Was that a Heads of State meeting or
11 foreign affairs meeting?

12 Q. It was a ministerial level meeting of the ECOWAS Committee
13 of Five on Sierra Leone in Abidjan?

14 A. Yes, I mean, that's why I asked the question because --

14:52:33 15 Q. On 28 December; do you recall that?

16 A. -- that's when a Foreign Ministers meeting - I would know
17 that the meeting occurred because my Foreign Minister was there.

18 Q. And you sent a representative to that meeting, isn't that
19 correct?

14:52:46 20 A. The Foreign Minister.

21 Q. And it was at this meeting, in fact on 28 December 1998,
22 that the Committee of Five was expanded to include Togo, correct?

23 A. December 1998. I cannot be certain, because Togo was
24 included at a Heads of State meeting. So I cannot say with

14:53:11 25 certainty that by this time at the Foreign Ministers meeting,
26 Togo was included on the Committee of Six. When Eyadema took
27 over as chairman, then Togo got on it. I can't be certain about
28 December 1998 that Togo - I don't think Togo was still - a part
29 of the committee yet. I'm not certain about that. I doubt it

1 though.

2 Q. Let's look at what has already been marked for
3 identification as MFI-66. It is S/1999/20, United Nations
4 document, 7 January 1999, Special Report of the Secretary-General
14:54:09 5 on the United Nations Observer Mission in Sierra Leone. Just
6 again so we're clear as to what we're seeing, we see the first
7 page here - this is MFI-66, DCT-100 - we see that is S/1999/20,
8 Special Report of the Secretary-General on the United Nations
9 Observer Mission in Sierra Leone. Yes, Mr Taylor, you see that?

14:55:02 10 A. Yes, I see that.

11 Q. And if we could please put page 3 of that document
12 containing paragraphs 11 to 15 on the screen, please. Mr Taylor,
13 if we could look at paragraph 13:

14 "On 28 December my special representative attended an
14:55:26 15 extraordinary ministerial level meeting of the ECOWAS Committee
16 of Five on Sierra Leone in Abidjan, chaired by the Minister for
17 Foreign Affairs of Togo. The committee, which comprises
18 Cote d'Ivoire, Ghana, Guinea, Liberia and Nigeria, was expanded
19 to include Togo, the current chairman of the Economic Community
14:55:50 20 of West African States (ECOWAS)."

21 Do you see that, Mr Taylor?

22 A. Yes, I see that.

23 Q. So that on 28 December the committee was expanded to
24 include Togo?

14:56:01 25 A. No, no. On the 28th it was not expanded to include Togo.
26 The Secretary-General is reporting, Togo had to be included
27 before because the inclusion of states during a Heads of State
28 meeting, so it had to be sometime before December.

29 Q. So when was that, Mr Taylor?

1 A. I would put that to maybe - normally Heads of State meet at
2 about September. I would put it to about September, October.

3 Q. Do you have a specific recollection of that, Mr Taylor?

4 A. No, I wouldn't lie to you.

14:56:42 5 Q. This is just based on your understanding of the workings of
6 ECOWAS?

7 A. Exactly. This is a Foreign Ministers meeting. The Foreign
8 Ministers only do preparatory work. The Heads of State meet.

9 President Eyadema takes over as chairman. It has to be before
14:56:56 10 the Foreign Ministers. And the reason why, just for the interest
11 of the judges, the reason why the Togolese Foreign Minister is
12 chairing the Foreign Ministers meeting is because Togo is now
13 chairman of ECOWAS. So it's sometime before.

14 Q. Now, Mr Taylor, let's look at paragraph 14 of this document
14:57:12 15 which was marked for identification during your direct
16 examination:

17 "According to the final communique issued by the committee
18 both the force commander of ECOMOG and the Minister for Foreign
19 Affairs of Sierra Leone implicated Liberia in providing military
14:57:28 20 support to the rebels."

21 Now, Mr Taylor, if we are to look at page 4 of the
22 document, looking at paragraph 16, beginning with "the committee
23 now known as the Committee of Six on Sierra Leone". Do you see
24 that paragraph, Mr Taylor?

14:58:00 25 A. That is correct.

26 Q. "Appealed to the rebels to cease fighting immediately, lay
27 down their arms and recognise the government of President Ahmad
28 Tejan Kabbah as the legitimate government in Sierra Leone, to
29 participate in dialogue and to accept the government's offer of

1 amnesty."

2 A. Excuse me, counsel, I'm not following. Which paragraph?

3 I'm sorry.

4 Q. That's paragraph 16 on page 4, Mr Taylor.

14:58:33 5 A. Okay. So what's the question? I missed your question,
6 counsel.

7 Q. We're looking at the language in paragraph 16 and you're
8 able to read that now, the committee appealing to the rebels to
9 cease fighting immediately. That's the beginning of that

14:58:48 10 paragraph, correct, Mr Taylor?

11 A. Yes. Yes, I see that.

12 Q. And then toward the bottom of that paragraph, "The
13 communique, which has been circulated as document S/1998/1232,
14 called for an expedited provision of logistical support to

14:59:11 15 ECOMOG."

16 And here, Mr Taylor, we're talking about ECOMOG in Sierra
17 Leone, correct?

18 A. I would say --

19 Q. This is 1999, so we're not talking about ECOMOG in Nigeria.

14:59:24 20 A. That's correct. I would say that, yes.

21 Q. And, again, Mr Taylor, looking at this call for expedited
22 provision of logistical support to ECOMOG, that was similar to
23 the many calls for provision of logistical support to ECOMOG in
24 Liberia, correct, Mr Taylor?

14:59:40 25 A. Counsel, when you say "was similar to". There were calls
26 for logistical support in Liberia. Similarity is another issue
27 I'm not - I don't know what you really mean, but there were calls
28 when ECOMOG was in Liberia during the crisis for assistance.

29 Q. And when you speak of the crisis, Mr Taylor, what time

1 period do you refer to?

2 A. I'm speaking - we're talk about '96 - '95, '96, coming on
3 to the end of the crisis.

15:00:21

4 Q. And then there is an expression of grave concern at the
5 aggression being perpetrated against Sierra Leone and a strong
6 condemnation of the activities of the countries providing support
7 to the rebels. You see that, Mr Taylor?

8 A. I see that [overlapping speakers].

15:00:38

9 Q. Now, when they're talking about grave concern at the
10 aggression being perpetrated against Sierra Leone, they're
11 including your government in Liberia in that. Isn't that
12 correct, Mr Taylor?

13 A. If you look, that document is done by the Committee of Six.
14 I cannot say who they are talking about. They haven't stated it
15 here. I'm a part of that committee. It's a Committee of Six
16 document, so I'm also raising concerns.

15:00:52

17 Q. And when there is a condemnation of the activities of
18 countries providing support to the rebels, that condemnation is
19 aimed at your government in Liberia, correct, Mr Taylor?

15:01:14

20 A. That is not correct. I'm on the committee. That is not
21 correct.

22 Q. Now, Mr Taylor, after the Freetown invasion, African
23 leaders continued to express concerns and condemnation of your
24 conduct. Isn't that correct, Mr Taylor?

15:01:46

25 A. Not that I'm aware of.

26 Q. And if we can look at tab number 25 in annex 2B.

27 If I may have a moment, Madam President.

28 MR GRIFFITHS: Madam President, we object to the use of
29 this document. You will note that the line indicating the part

1 of the document to be relied on by the Prosecution encompasses
2 details of an importation of arms via a Ukrainian registered
3 cargo aircraft which was told to continue on to Monrovia. That
4 is clearly indicative of guilt.

15:03:57 5 Now, this is a new document. It wasn't included as part of
6 the Prosecution's case, and it seems to us that apart from asking
7 the witness whether he was aware of a statement made by Major
8 General Felix Mujakperuo, it seems to us that the remainder of
9 this document should be ruled inadmissible in that it goes to
15:04:33 10 guilt and it's unfair to the interests of this defendant for him
11 to be asked to deal with this when we don't even know, for
12 example, the source of the information which led to the statement
13 by this writer.

14 Where does this document come from? Who wrote it? What is
15:04:55 15 the source of the information which leads to the paragraph
16 stating that a Ukrainian registered cargo aircraft, et cetera?
17 Where does that information come from? We don't know. It seems
18 to us in the circumstances that it would be grossly unfair to
19 expect this witness to deal with the contents of this document,
15:05:19 20 save to ask him if he was aware of an allegation made by
21 General Mujakperuo, a warning to warmonger Presidents. It seems
22 that's as far as my learned friend can go, but no further.

23 PRESIDING JUDGE: Ms Hollis, do you wish to respond to the
24 objection?

15:05:40 25 MS HOLLIS: Thank you, Madam President. Any issues as to
26 the source of the information provided to General Mujakperuo goes
27 to any weight that might be given this document should it be
28 admitted.

29 In terms of the argument being made about our inability to

1 use it, we have made our arguments previously on this point. We
2 are using this document for impeachment. That is our only
3 intended use for this document. It does relate to arms coming
4 into Liberia and we have already made our argument about that
15:06:23 5 being separate and distinct from arms flowing from Liberia to
6 Sierra Leone.

7 In regard to other arguments about meeting the test that
8 must be met, should your Honours determine this is probative of
9 guilt, we have made those arguments previously to your Honours,
15:06:45 10 including today, and we would rely on those arguments. And we
11 would argue that we should be allowed to use this document, both
12 in the interest of justice and because it does not violate the
13 fair trial rights of this accused.

14 PRESIDING JUDGE: We'll take a few moments to read the
15:07:14 15 article and to confer.

16 [Trial Chamber conferred]

17 PRESIDING JUDGE: We've conferred and we've looked at the
18 document and in particular the paragraphs that are marked in the
19 margin, that will be on the first page and on the top of the
15:10:04 20 second page, and we have no doubt that they contain material that
21 is probative of the guilt of the accused and that goes directly
22 to the indictment. There's also no doubt that this is new
23 material that the Prosecution did not adduce during their case in
24 chief.

15:10:28 25 We are of the view that we have not heard anything to
26 persuade us that its use or the use of these paragraphs would be:
27 One, in the interests of justice; or two, that they would not be
28 prejudicial to the fair trial rights of the accused. We
29 therefore rule that the document cannot be used at this time.

1 MS HOLLIS:

2 Q. Now, Mr Taylor, in addition to former Force Commander
3 Victor Malu and General Shelpidi during the time he was force
4 commander of ECOMOG, General Mujakperuo, who also became a force
15:11:21 5 commander of ECOMOG, voiced his concern about your actions in
6 relation to Sierra Leone. Isn't that correct?

7 A. Mujakperuo - I'm not sure if Mujakperuo was assigned to
8 Liberia. I don't --

9 Q. I'm talking about Sierra Leone, Mr Taylor.

15:11:39 10 A. I don't have any recollection of what Mujakperuo said or
11 didn't say when he was in Sierra Leone.

12 Q. Mr Taylor, that's not really true, is it? You recall the
13 warning that he gave to warmonger Presidents, don't you,
14 Mr Taylor?

15:11:58 15 A. I've just I don't recall any - Mujakperuo could not have
16 warned me. I don't recall any warning from any general called
17 Mujakperuo.

18 Q. And, Mr Taylor, this was when Major General Felix
19 Mujakperuo was the new force commander in Sierra Leone, April
15:12:22 20 1999. You do in fact remember, don't you, that this general
21 warned both you and the President of Burkina Faso about your
22 activities in relation to Sierra Leone. You remember that, don't
23 you, Mr Taylor?

24 A. Ms Hollis, I don't - Mujakperuo did not - I never received
15:12:43 25 any warning from Mujakperuo. Never. I don't think he could
26 have, and he didn't.

27 Q. And, Mr Taylor, you also know, don't you, that ECOMOG at
28 this time in 1999 indicated that it would no longer watch this
29 mischief by supposed leaders continuing side by side with the

1 peace initiative, in view of the danger it poses to us and the
2 whole sub-region. You remember ECOMOG making that statement,
3 don't you, Mr Taylor?

15:13:23

4 A. No, I don't remember ECOMOG - ECOMOG - making any
5 statement.

6 Q. Mr Taylor, you would remember that, because that statement
7 was actually aimed at you. Isn't that correct?

15:13:43

8 A. That's not correct. The ECOMOG - under the command of the
9 chairman of ECOWAS no general or whoever in ECOMOG could have
10 warned any member of the authority of ECOWAS. That's total
11 nonsense. I don't know what they spoke about in a corner, but no
12 Nigerian general - any other general in West Africa could have
13 issued a statement of warning to any member of the authority as a
14 President of West Africa. That would be total nonsense.

15:13:59

15 Q. That's just a lie, isn't it, Mr Taylor --

16 A. It's not a lie; it's just a misunderstanding --

17 Q. -- because you're very aware of it, and you're able to make
18 that lie because you can't really be tested on it. Isn't that
19 right, Mr Taylor?

15:14:11

20 A. I think it's your misunderstanding of authority. When a
21 general gets to the point to warn a President in West Africa, I
22 think you don't understand the workings of ECOWAS [overlapping
23 speakers].

15:14:27

24 Q. Mr Taylor, ECOMOG also said and called on the international
25 community to prevail on you, Charles Taylor, and your colleagues
26 to desist from this evil action if peace is to be restored.
27 Isn't that right, Mr Taylor?

28 A. When you say ECOMOG, maybe I've - maybe I could be - may
29 not be saying - when you speak about ECOMOG saying, who is

1 ECOMOG?

2 Q. Mr Taylor, ECOMOG made that statement, did it not?

3 A. ECOMOG did not, from my knowledge, make that statement. It
4 depends on when you talk about ECOMOG.

15:14:56 5 Q. So even though it was aimed at you specifically, you're
6 saying you don't know anything about it?

7 A. I don't know as to whether it was aimed - any statement was
8 aimed at me. I know of no warning or statement issued by a
9 general, because ECOMOG is under the authority of ECOWAS under
15:15:13 10 the command of the chairman. So when you say ECOMOG, any
11 official statement from ECOMOG had to be made by the chairman of
12 ECOWAS that was in command of ECOMOG. If a general says
13 something out there, I didn't get it and didn't even have to get
14 it.

15:15:31 15 Q. And, Mr Taylor, this warning was given to you by the new
16 force commander in Sierra Leone, Major General Mujakperuo,
17 because for some reason apparently he wasn't aware you were the
18 point President for peace. Is that right, Mr Taylor?

19 A. I'm not sure of what he was aware of, but you can tell from
15:15:56 20 what you are saying here that there's a lot of things he didn't
21 know about what he was doing, because he could not have warned
22 any President in West Africa.

23 Q. So, Mr Taylor, it's really correct, is it not, that concern
24 about your conduct towards Sierra Leone in 1998 and 1999 was
15:16:21 25 being expressed by African leaders trying to solve African
26 problems. That's true, is it not, Mr Taylor?

27 A. Which African leaders are you referring to?

28 Q. Well, we've talked about those ECOMOG leaders, haven't we,
29 Mr Taylor?

1 A. That's what you call African leaders? No.

2 Q. So African leaders including Major General Malu, General
3 Shelpidi, General Mujakperuo, trying to solve African problems
4 were voicing their concerns about your conduct in relation to
15:16:57 5 Sierra Leone. Isn't that right, Mr Taylor?

6 A. Look military people - that's not correct. Military people
7 stay in their places. No military general in Nigeria had a
8 capacity, neither did they warn any of the individuals, Blaise
9 Compaore and Charles Taylor. And if it had happened, I think
15:17:12 10 ECOWAS would have disintegrated. Military people stay in their
11 places and you know that. You are from a military personnel.

12 Q. And, Mr Taylor, ECOWAS supported what was being said by
13 those ECOMOG commanders. That's correct, is it not?

14 A. That is totally incorrect.

15:17:27 15 Q. And the reason they were making these statements is that
16 far from being the point President for peace, you were in fact in
17 actuality an impediment to peace in the region. Isn't that
18 correct?

19 A. That is incorrect. In fact, the two generals, both Malu
15:17:45 20 and the other man, found themselves in hot water and almost lost
21 their profession because of their probably uncontrollable
22 behaviour. That's why their Presidents - both the two of them
23 were handed - no, that's not true. No, I would say no.

24 PRESIDING JUDGE: Mr Taylor, who do you mean by "the other
15:18:06 25 man"? "Both Malu and the other man"?

26 THE WITNESS: And Shelpidi. Both Malu and General Shelpidi
27 that in fact had conflict with me in Liberia were both
28 disciplined by their governments - I mean by their government,
29 excuse me. Both of the generals.

1 MS HOLLIS:

2 Q. And how were they disciplined, Mr Taylor?

3 A. Mr Malu was removed and Shelpidi was also removed.

4 Q. They were removed because you insisted on it and your
15:18:34 5 friend agreed to it; that's the fact of it, isn't it, Mr Taylor?

6 A. No, it had to be with discipline, I would put it.

7 Q. You didn't want generals in Liberia who would oppose your
8 decisions about what to do in Liberia. Isn't that right,
9 Mr Taylor?

15:18:47 10 A. But that's not the case, that's incorrect.

11 Q. So you insisted that they be removed. Isn't that right?

12 A. That's - I insisted that those generals be removed because
13 of different reasons outside of what you're talking about.

14 Q. And your request was honoured?

15:19:02 15 A. And their Presidents - their President saw fit to remove
16 them, along with the chairman of ECOWAS. It's important for the
17 judges to understand that the ECOMOG forces are controlled by
18 whoever is the current chairman of ECOWAS. During that
19 particular period, General Eyadema was the overall

15:19:24 20 commander-in-chief of ECOMOG. So removing a commander from
21 ECOMOG had to be the decision of the host country and the
22 chairman of ECOWAS. Both of those parties saw fit to remove
23 those generals.

24 Q. Mr Taylor, is it the secretariat that is in command of
15:19:44 25 ECOMOG?

26 A. The secretariat - you have the executive secretary. The
27 secretariat take care of the day-to-day activities, financial and
28 others. The command of ECOMOG is always in the hands of the
29 sitting chairman of ECOWAS at the time.

1 Q. Mr Taylor, in order to appease you they gave in to your
2 request that these two men be reassigned. Isn't that correct?

3 A. I would say you're incorrect. These are not silly
4 Presidents, and both of these men were generals.

15:20:13 5 Q. These men weren't forced to retire, were they, Mr Taylor?

6 A. Beg your pardon?

7 Q. These men weren't forced to retire from the military, were
8 they, Mr Taylor?

9 A. Oh, I have no knowledge of what happened to General

15:20:25 10 Shel pi di .

11 Q. Mr Taylor, you said they were punished?

12 A. By removing them they were punished, yes. I did not say
13 they were removed from their services.

14 Q. So removing them and giving them a different assignment,
15:20:34 15 that's punishment?

16 A. It reminds me --

17 Q. Mr Taylor, is that punishment in your view?

18 A. It's a form of punishment, yes. We are reminded when
19 General McArthur was removed from Japan during World War II

15:20:51 20 unceremoniously is a punishment. When --

21 Q. Mr Taylor --

22 A. Excuse me, counsel --

23 Q. -- we don't want a speech.

24 A. Excuse me, counsel, may I just answer?

15:20:58 25 Q. You were asked if that was your view, Mr Taylor.

26 A. It is a punishment. When a general is removed
27 unceremoniously from his post before his tour of duty is over, it
28 is punishment. That's my answer.

29 Q. And, Mr Taylor, General Shel pi di was given the command in

1 Sierra Leone. Isn't that correct?

2 A. He was given the command in Sierra Leone, but remember what
3 happened. I threw General Shelpidi out of my office, and I told
4 this Court about it.

15:21:20 5 Q. You're used to getting your way with things, aren't you,
6 Mr Taylor?

7 A. No, indiscipline and - it's something that I've never -
8 I've never appreciated, and so I could not accept it.

9 Q. The problem was, Mr Taylor, these men wouldn't bow to your
15:21:43 10 wishes, isn't that right?

11 A. Oh, no, counsel, no, not at all. I never expected them to,
12 no.

13 Q. The third general himself, Mujakperuo, also expressed his
14 very great concern about your conduct; isn't that right,
15:21:58 15 Mr Taylor? Another African leader expressing his concern about
16 your conduct?

17 A. I wouldn't term Nigerian generals as African leaders as you
18 look at it. I have a different interpretation of African
19 leaders. When I think about African leaders, I'm talking about
15:22:15 20 Presidents, Prime Ministers, former Heads of State and all that
21 different - I mean, and other dignitaries. I have never looked
22 at those generals - they are Africans and they are - they lead
23 their - but not in the sense that I interpret when we talk about
24 - when I talk about African leaders, I was not including Nigerian
15:22:37 25 generals.

26 Q. And in fact, Mr Taylor, President Jerry Rawlings also
27 condemned your actions supporting the rebels in Sierra Leone.
28 Isn't that correct?

29 A. Jerry never did. Jerry never, ever did.

1 Q. In fact, he said that your actions constituted a stab in
2 the back. Isn't that correct, Mr Taylor?

3 A. Jerry and I were friends. If he had anything to tell me -
4 there have been things that have been attributed to what Rawlings
15:23:08 5 - Rawlings and I are - we were both born in 1948. We're very
6 good friends. Jerry Rawlings never told me any such thing.
7 There have been statements attributed, from what I'm hearing from
8 you. But Jerry and I met at meetings; from time to time, he
9 visited me. Never told me that.

15:23:28 10 JUDGE DOHERTY: Ms Hollis, before we move off this topic
11 could I clarify an answer? It's at page 134, line 24 and
12 following on mine. He said, "Their Presidents" - this was
13 concerning the removal of the generals, "Their Presidents - their
14 President saw fit to remove them along with the chairman of
15:23:51 15 ECOWAS." Now, that reads to me as though the chairman of
16 ECOWAS - that was my first interpretation - that the chairman of
17 ECOWAS was also removed, although this does not appear to follow,
18 and could I clarify that, please.

19 MS HOLLIS: Thank you, your Honour:

15:24:08 20 Q. Mr Taylor, when you said, "Their President saw fit to
21 remove them, along with the chairman of ECOWAS", could you
22 explain to the judges what you meant by that statement? First of
23 all, just so we can be clear, who was removed?

24 A. Okay, when I say - I think I corrected that, your Honour,
15:24:25 25 when I said "President". But I'm saying the decision to bring in
26 or remove a commander --

27 Q. No, Mr Taylor. First of all, when you said saw fit to
28 remove "them", who was removed?

29 A. General Victor Malu and Timothy Shelpidi are the two

1 generals I'm referring to as "them".

2 Q. So, Mr Taylor, when you said "along with the chairman of
3 ECOWAS", you were talking about what you say was the involvement
4 in the chairman of ECOWAS in the removal of those two generals?

15:24:55 5 A. Yes. The chairman of ECOWAS had to be involved because the
6 appointment of a general is agreed by the chairman of ECOWAS.

7 JUDGE DOHERTY: So, in effect, what you were saying was, it
8 wasn't that ECOWAS chairman was removed, but he had a hand in the
9 removal of the two generals?

15:25:19 10 THE WITNESS: His acquiescence, your Honour, that is
11 correct.

12 JUDGE DOHERTY: Thank you for that.

13 MS HOLLIS: Yes, your Honour:

14 Q. Now, Mr Taylor, you earlier told the judges that indeed
15:25:39 15 Jerry Rawlings did make remarks condemnatory of you. What do you
16 recall Jerry Rawlings saying?

17 A. Statements that were attributed to Rawlings that - I heard
18 that Jerry said, "If these things that are alleged about
19 President Taylor are right, then this would constitute - it would
15:26:04 20 not be proper." "If these things that are alleged", because this
21 is what I - you know, this was what was attributed to Jerry, but
22 he never said to that me or in a formal meeting. And I don't
23 even know who he said it to.

24 Q. Now, Mr Taylor, you have painted a picture for these judges
15:26:44 25 of a very good relationship between you and President Kabbah of
26 Sierra Leone, correct?

27 A. From my standpoint, I always looked at it that way, yes.

28 Q. And you have painted a picture that President Kabbah was
29 appreciative of your efforts relating to Sierra Leone. Isn't

1 that right?

2 A. Based on our discussions and the letter that he wrote, yes.

3 Q. Now, if this were true, Tejan Kabbah and the Government of
4 Sierra Leone would have greatly appreciated your peace promotion
15:27:13 5 efforts. Isn't that right?

6 A. Well, yes, I received letters from Kabbah stating to me his
7 appreciation for what I was doing. I received a message from
8 Kabbah through Secretary-General Kofi Annan, to be exact on July
9 7 or 8 of 1999, extending his appreciation. That message was
15:27:34 10 delivered to me by Kofi Annan, so I have to take his word for it.

11 Q. Now, Mr Taylor, as far back as 1997 the reality is, the
12 Government of Sierra Leone was publicly pointing out your
13 negative role in relation to Sierra Leone. Isn't that correct?

14 A. Well, look, it's a short question, but to be very clear
15:27:59 15 about it, President Kabbah, while we had our differences, did in
16 fact on several occasions say that or alleged that Liberia was
17 involved in Sierra Leone. There were occasions where those
18 accusations were rejected, when it comes to the 5,000 troops and
19 other things, and sometimes Kabbah and I would talk on the phone
15:28:22 20 and clear up some of these matters. So these were accusations.

21 I accused Kabbah too on many occasions. So these accusations
22 being traded between Tejan Kabbah and myself occurred over a
23 period of time, but I did not consider him an enemy.

24 Q. Well, that wasn't the question, Mr Taylor. You remember
15:28:42 25 back to 1997 when a representative of President Kabbah accused
26 the AFRC of violating the peace accord agreement reached in
27 October 1997. You recall that, don't you, Mr Taylor?

28 A. Which representative? I don't --

29 Q. Mr Taylor, do you recall a representative of

1 President Kabbah accusing the AFRC of violating the peace accord
2 agreement that was reached in October in Conakry, Guinea? Do you
3 recall that?

15:29:17 4 A. Specifically, I don't recall. Maybe if you mention the
5 name it may refresh my memory.

6 Q. And do you recall the representative accusing the AFRC of
7 importing weapons into Sierra Leone from Liberia?

8 A. I don't recall this person. If you refresh my memory, I
9 probably --

15:29:35 10 Q. Mr Taylor, whether you recall the person or not, you recall
11 that accusation, don't you, in 1997?

12 A. I don't specifically - I don't have any recollection right
13 now of who or what was said.

14 Q. And the Government of Sierra Leone representative
15:29:54 15 indicating that it had information that your government was
16 working with the junta to undermine the peace plan. You recall
17 that, don't you, Mr Taylor?

18 A. We are talking in abstraction here about somebody that may
19 have said. I don't recall that, Ms Hollis.

15:30:09 20 Q. Now, Mr Taylor, as the point President for peace, you would
21 be very sensitive to such comments by the Government of Sierra
22 Leone, would you not?

23 A. But I can't answer that because whoever is supposed to be
24 speaking, I don't know as to whether he is from the Government of
15:30:25 25 Sierra Leone --

26 Q. Mr Taylor --

27 A. No.

28 Q. Mr Taylor, as the point President for peace, you would be
29 very sensitive to such comments by the Government of Sierra

1 Leone, would you not?

2 A. If the Government of Sierra Leone, the Government of Sierra
3 Leone, were to make a statement, I would be concerned about it.

15:30:51

4 Q. And you do recall those statements being made in relation
5 to you by the representative of the Government of Sierra Leone in
6 1997, don't you, Mr Taylor?

7 A. I have no recollection of what you're talking about.

15:32:06

8 Q. If we could look at tab number 27 in annex 2B. Mr Taylor,
9 you see "Sierra Leone Web-Sierra Leone News-October 1997". It
10 says 30 October. If we could look at the passage that is marked:

11 "An aide to deposed President Ahmad Tejan Kabbah accused
12 the AFRC of violating the peace accord agreed to last week in
13 Conakry, Guinea, and importing truckloads of arms into Sierra
14 Leone from Liberia. 'We are having information that

15:32:33

15 Charles Taylor's government in Liberia is working with the junta
16 to undermine the peace plan,' Joseph Williams is reported as
17 saying. Williams warned that the import of arms and ammunition
18 in preparation for an all out offensive against ECOMOG troops in
19 Sierra Leone."

15:32:55

20 Now, Mr Taylor, this accusation by a representative of the
21 Government of Sierra Leone --

22 MR GRIFFITHS: Madam President, I think it's only fair that
23 if Ms Hollis attempts to ask this witness about this passage that
24 she continues by reading out the rest of it:

15:33:16

25 "'He said that there are arms-laden ships off the coast of
26 Sierra Leone's coast and that they are off-loading two ships,'
27 Williams said."

28 The reason I submit that it would be fair to do so is
29 because we need to bear in mind, this is dated 30 October. In

1 this passage, there's talk of truckloads of arms coming over the
2 border from Liberia. Bear in mind also that the clear suggestion
3 was made last week that Mr Taylor was responsible for an
4 importation of arms into Magburaka in late September of this
15:33:52 5 year. So it seems only fair that she reads out all of the
6 passage and not just that select part.

7 PRESIDING JUDGE: Ms Hollis, do you want to respond?

8 MS HOLLIS: I'd be very happy to do that. We've never said
9 Magburaka was the only assistance in arms and ammunition that
15:34:14 10 this accused gave to the junta in 1997, but we'll be very happy
11 to continue:

12 Q. "He said there are arms' laden ships off the Sierra Leone
13 coast and that they are off-loading two ships. Williams, who had
14 been running the clandestine pro-Democracy radio station 98.1
15:34:34 15 said that the junta was trying to jam the radio station's
16 frequency."

17 Now, Mr Taylor, these comments about your involvement with
18 the junta and bringing arms and war materials into the country,
19 those would have been very important for you to be aware of.
15:34:54 20 Isn't that correct?

21 A. I wouldn't be aware of what Joseph William or anybody
22 talking. I went to Conakry in late 1997 --

23 Q. Mr Taylor, that would have been very important for you
24 [overlapping speakers] would it not?

15:35:04 25 A. It would not have been important to me, except it was
26 issued by President Kabbah. It would not be important to me.

27 Q. And, Mr Taylor, as the point President for peace, it would
28 be very important that you know about these comments because it
29 would impact your ability to act effectively in that role. Isn't

1 that correct?

2 A. We're talking about October 1997.

3 Q. That's correct.

4 A. And I'm in office for two months, and let's not forget
15:35:35 5 that.

6 Q. So exactly what time, Mr Taylor, are you telling us that
7 you became a part of the committee?

8 A. I became a part of the committee in August.

9 Q. So in October these comments that you are assisting in
15:35:45 10 bringing materials into Sierra Leone would be very important for
11 you to be aware of. Isn't that right?

12 A. No. Somebody calling himself Joseph Williams, not an
13 official of the Sierra Leonean government. This wouldn't be
14 important to me, to answer your question. It wouldn't be. It
15:36:05 15 wouldn't be. Joseph Williams gets up and if he says something,
16 if, it wouldn't be important to me, unless it's coming from
17 Kabbah, because, like I say, I was in Conakry with Tejan Kabbah
18 and Jesse Jackson late in '97, so this wouldn't be important to
19 me, no.

15:36:22 20 Q. Mr Taylor, if one of your aides made a statement, would
21 that aide be acting independently or at your direction?

22 A. In my government an aide to me would be - it would be
23 grossly disciplinary for him to make such a statement and I
24 would probably dismiss him, because official statements of
15:36:40 25 government are not given by a mere aide.

26 Q. Mr Taylor, if an aide to you made such a statement, they
27 would be acting on your authority. Isn't that right?

28 A. No, no, not - when you say aide, again, it depends. If you
29 look at my Foreign Minister as an aide, I would say yes. But a

1 radio station operator here speaking, I don't look at it - I
2 would say I would not accept that from an aide, no. He would not
3 be acting with my authority.

15:37:06

4 Q. Mr Taylor, does it indicate here this is a radio station
5 operator?

6 A. Well, he said that Williams says that he's running -
7 somebody is trying to jam a radio station. You know, who is he?

8 Q. Now, Mr Taylor, indeed you were aware of that?

9 A. Of what?

15:37:19

10 Q. Noted concern about your conduct as earlier as October of
11 1997, weren't you?

12 A. No, no, no.

13 Q. And this was being voiced by an aide to the ousted
14 President of Sierra Leone, so an African leader's aide was

15:37:37

15 voicing this concern about your conduct. Correct, Mr Taylor?

16 A. No, incorrect. I do not know, first, if this guy is an
17 aide, so I cannot accept your proposition. I do not accept your
18 proposition.

15:37:57

19 MS HOLLIS: Now, Madam President, if we could have this
20 extract marked for identification. It would be 334, next in
21 line, and I believe that would be J.

22 PRESIDING JUDGE: This excerpt from the Sierra Leone Web,
23 30 October, is marked MFI-334J.

24 MS HOLLIS:

15:38:28

25 Q. Now, Mr Taylor, President Kabbah really did not have an
26 appreciation for your supposed role as point President for peace,
27 did he?

28 A. I would disagree with you. He dealt with me. He visited
29 me in Liberia. He dealt with me, so I disagree with your

1 proposition.

2 Q. And, in fact, Mr Taylor, you yourself were not even
3 welcomed at the reinstatement ceremony for Tejan Kabbah, were
4 you?

15:38:56 5 A. That is - well, Tejan Kabbah invited me, but I did not
6 attend because of, I understand some civil, what do you call them
7 - civil - these civil groups I think wanted to demonstrate and so
8 I did not attend, but I was invited.

9 Q. And these were because of criticisms against your role in
15:39:25 10 Sierra Leone that were being voiced in Sierra Leone. Isn't that
11 right, Mr Taylor?

12 A. Well, I can't say with any certainty, but I know it's a
13 part of the same, you know - fed into the people of Sierra Leone
14 for several years, "Taylor did it. Taylor did it. Taylor did
15:39:43 15 it." And so naturally some people would be upset and that's why
16 I'm here, to prove that Taylor didn't.

17 Q. And, in fact, Mr Taylor, you ended up sending a fairly
18 low-ranking Liberian delegation to the reinstatement ceremony.
19 Isn't that correct?

15:39:59 20 A. I sent a delegation.

21 Q. And even that delegation was not accepted in a positive way
22 in Sierra Leone. Isn't that right?

23 A. I don't know how to term that. The tension that had been
24 built up, just as what the Prosecution has told the entire
15:40:19 25 country of Sierra Leone, The guy that did it is Taylor, there
26 were some tensions. But we were invited, and I sent a delegation
27 to represent me.

28 Q. And, Mr Taylor, if we could look, please, at tab number 28
29 in annex 2B. It is from the Independent Observer, March 9, 1998.

1 Mr Taylor, "Sierra Leoneans condemn Taylor's coming, say 'We
2 don't want Charles Taylor here tomorrow'."

3 PRESIDING JUDGE: Ms Hollis, I'm sorry to interrupt.
4 Apparently my microphone was not on, but the MFI that I just
15:41:35 5 marked was MFI-334J.

6 MS HOLLIS: Thank you, Madam President:

7 Q. Now, Mr Taylor, you see this article and you see the title
8 or the caption for the article?

9 A. I see the title.

15:41:56 10 Q. And if we were to look at the bottom paragraph under the
11 picture of Nelson Mandela:

12 "Meanwhile, investigations by the Independent Observer
13 revealed that there has been widespread criticisms over the
14 coming of the Liberian leader Charles Taylor, who is also
15:42:28 15 reported to be expected here tomorrow. These criticisms are
16 mainly centred on Taylor's commitment and support to the illegal
17 AFRC junta. It would be recalled that Taylor was the only
18 President who called for the release of the RUF leader Corporal
19 Foday Saybana Sankoh, adding that only his release would further
15:42:54 20 the peace process. Taylor also attempted to restrict the flight
21 of all ECOMOG jets from Liberia to Sierra Leone and gave some of
22 his fighters to beef up the security network of the junta."

23 So, Mr Taylor, there were criticisms about your role in
24 Sierra Leone which resulted in your not travelling to Sierra
15:43:21 25 Leone for this reinstatement ceremony. Isn't that correct?

26 A. According to this paper, this paper criticises. I don't
27 know who else they're referring to, but that's what the paper
28 reports. I would disagree, because President Kabbah was smart
29 enough that if there had been any governmental objection, Kabbah

1 would never have invited me. So as far as I'm concerned, there
2 were - this is this man's opinion about that, but I think that
3 Tejan Kabbah was smart enough that seeing the situation, if it
4 was such that meant something serious to him, he would just have
15:43:58 5 denied sending the invitation. So this is his opinion.

6 Q. And, Mr Taylor, to your knowledge, President Kabbah never
7 came out and made any statement that these criticisms were
8 invalid, did he?

9 A. I don't understand the question, but I will try to answer.

15:44:22 10 Q. To your knowledge, Mr Taylor, President Kabbah never made
11 any statements that these criticisms were invalid, did he?

12 A. Well, to my knowledge I know of at least a few times that
13 Kabbah had said that it was incorrect that certain things had
14 been reported. One incident is on the troops, he conceded that
15:44:47 15 it was not true, and on some other issues. So he did concede on
16 some points, but this is politics. It depends on what is
17 happening at the time. But Kabbah continued to work with me.
18 For me, that's important.

19 Q. And, Mr Taylor, President Kabbah never came out to the
15:45:07 20 people of Sierra Leone in response to these criticisms to point
21 out your important role as the point President for peace, did he?

22 A. I can't speak to that. If he did, I can't speak to that.
23 I don't know Kabbah - in fact, Kabbah visited Liberia a minimum
24 of two times. So for me, I don't know how to answer that.

15:45:31 25 Q. Mr Taylor, during the time that you were President of
26 Liberia, how many times did you visit Sierra Leone?

27 A. I did not visit Sierra Leone at all as President of
28 Liberia.

29 MS HOLLIS: Madam President, I would ask that this article

1 be marked for identification.

2 PRESIDING JUDGE: This page of the Independent Observer is
3 marked for identification MFI-340.

4 MS HOLLIS: Perhaps our account is off. We have the next
15:46:24 5 in line as 339, but we may be wrong about that.

6 MR GRIFFITHS: [Microphone not activated].

7 MS HOLLIS: Thank you:

8 Q. Now if we could also, please, look at tab number 29 in
9 annex 2B. This is page 1 of 1, Sierra Leone Web - Sierra Leone
15:47:09 10 News - March 1998, and it shows 14 March. And the marked
11 paragraph has to do your Liberian Deputy Minister of Information
12 commenting on the poor reception that was accorded to your
13 delegation in Freetown. Yes, Mr Taylor?

14 A. This is what is attributed to him.

15:47:34 15 Q. Now, Mr Taylor, 14 March 1998, was your Deputy Minister of
16 Information Arthur Massaquoi?

17 A. Arthur, yes, he was deputy minister.

18 Q. And it indicates here that he said: Saturday, that the
19 poor reception accorded to the Liberian delegation in Freetown
15:47:55 20 was due to the work of detractors who had succeeded in
21 misrepresenting Liberia's position in the Sierra Leone crisis. A
22 low-ranking Liberian delegation made up of Deputy Speaker of the
23 House, Patrick Williams, and officials of the Foreign Ministry
24 and Ministry of Internal Affairs were jeered at the reinstatement
15:48:15 25 ceremony for President Ahmad Tejan Kabbah on Tuesday. Massaquoi
26 told Liberian Star Radio Tuesday that relations between the two
27 countries remain cordial, and suggested that it was time for the
28 two countries to work to revitalise the Mano River Union which
29 also includes Guinea."

1 So, Mr Taylor, even your delegation that you ended up
2 sending was not cordially received in Sierra Leone, was it?

3 A. I have just said that. I said that, yeah, and what he said
4 here is correct. Due to detractors that had been, you know -
15:48:55 5 it's natural for people to be upset when you tell them Taylor is
6 doing it. It's natural. We had - bush got a shoe thrown at him
7 in Iraq, so there's hostility under these circumstances.

8 Q. Mr Taylor, the portions of these extracts that you believe
9 are favourable to you, you think are accurate, is that correct?

15:49:14 10 A. Ms Hollis, no, I don't operate that way. Don't bring me to
11 that level. Mr Massaquoi, you asked me if he was deputy
12 minister; I said he was. Patrick Williams was the Speaker. You
13 had asked me before this and I said that based on the
14 hostilities, they were not well received. I have admitted to
15:49:33 15 that, so I don't know what the question is.

16 Q. Now, Mr Taylor, March 1998, Liberian Star Radio - Star
17 Radio was owned or operated by whom in March 1998?

18 A. Star Radio was owned and operated still by a group - in
19 fact, Star Radio was always operated by, I think - I forgot who
15:50:06 20 was in charge of Star Radio, but it was not owned by Liberia.
21 Neither was it owned by the government. It was still under the
22 control of the United States embassy in Monrovia.

23 Q. So Star Radio, you're saying, was under the control of the
24 United States embassy in March 1998?

15:50:27 25 A. That is correct.

26 Q. And you were allowing it to operate at that time, correct?

27 A. We were still having trouble about trying to --

28 Q. Mr Taylor, and you were allowing it to operate at that
29 time, correct?

1 A. Well, "allowing" is a different thing. We were going
2 through the process of trying to close it down.

3 Q. Mr Taylor, as of mid-March of 1998 you were allowing Star
4 Radio to operate in Liberia. Isn't that correct?

15:50:54 5 A. Star Radio was operating, yes.

6 Q. And if your government had decided to close it down, it
7 would no longer be operating at that time, correct?

8 A. That is incorrect.

9 Q. Well, at some point, Mr Taylor, your government in fact did
15:51:12 10 close it down, didn't it?

11 A. After we had gone through the process of discussion we did
12 close it down, yes.

13 Q. So that at this time if your government had decided to
14 close it down, it would no longer have been operating, correct?

15:51:29 15 A. Well, look, our relationship, Ms Hollis, with diplomatic
16 communities are a little different from your knowledge of it. We
17 had informed the United Nations government that we wanted it
18 closed.

19 Q. Mr Taylor, the question is that if at this time your
15:51:44 20 government had decided to close down this radio station, it would
21 no longer have been operating. Is that correct?

22 A. That's - that proposition I would say we would not have
23 acted in a hostile way against the United States government. So
24 to ask the question as the proposition is put, yes or no would
15:52:07 25 not give these judge as clear understanding of my answer.

26 Q. Now, Mr Taylor, as of mid-March of 1998 representatives of
27 your government were still giving information to Liberian Star
28 Radio, correct?

29 A. No. As you put it, I would say no. When you say giving

1 information, I would not put it that way. I would not put it
2 that way.

3 Q. Well, let's take a look. Making statements to Liberian
4 Star Radio?

15:52:35 5 A. I would still not put it that way.

6 Q. Well, let's take a look at the --

7 A. Star Radio was - was recording and reporting statements
8 made by the government.

9 Q. Mr Taylor, "Massaquoi told Liberian Star Radio Tuesday that
10 relations between the two countries remain cordial and suggested
11 it was time for the two countries to work to revitalise the Mano
12 River Union, which also includes Guinea." "Massaquoi told Star
13 Radio". So representatives of your government, or at least one
14 representative, was still making statements to Liberian Star
15 Radio in mid-March 1998. Correct?

16 A. You've got it - I cannot answer yes or no the way you put
17 it unless you clarify it for me. Because the Deputy Minister of
18 Information made a statement. It's reported by Star Radio. The
19 way you are putting it to say he was going there, here is this,
20 no. Star Radio is reporting what the minister says.

21 Q. So, Mr Taylor, you're disputing the word "told". Is that
22 right? "Massaquoi told Liberian Star Radio Tuesday". You're
23 disputing "told"?

24 A. No, no. That's what I'm disputing.

15:53:42 25 Q. That would indicate that he in fact made that statement to
26 them, wouldn't it, Mr Taylor?

27 A. You asked me. That's not what I'm talking about.

28 Q. Well, Mr Taylor, that's what I'm talking about, so let's
29 deal with my question. Now in mid-March --

1 A. So what is your question?

2 Q. In mid-March 1998 at least one representative of your
3 government was making statements to Liberian Star Radio, isn't
4 that correct?

15:54:06 5 A. Your proposition is incorrect. Star Radio was reporting
6 what the deputy minister said.

7 Q. So, Mr Taylor, you do dispute when it's said that he told
8 Star Radio this?

9 A. Well, my interpretation of "told" as I want to tell these
15:54:27 10 judges is that Star Radio was the only source of this
11 information, and Star Radio was not the only source, okay? For
12 me, if you say he told Star Radio, it means Star Radio was the
13 only source and this was almost like privileged information for
14 Star. And what I'm telling the judges is that the minister made
15:54:47 15 a statement at a conference that Star Radio attended, so in a
16 way, all of the agencies there can say the minister told Star or
17 the minister told XYZ. That's the context that I'm trying to
18 give the judges.

19 Q. Now, Mr Taylor, your deputy Minister of Information, Arthur
15:55:09 20 Massaquoi, did not indicate in any way at this time that
21 President Kabbah had told these jeering people that you were the
22 point President for peace. Correct?

23 A. I don't know the full extent of the minister's statement.
24 What you have is a paraphrased part quoted by another source and
15:55:31 25 I do not know the full statement made by the minister, so I can't
26 answer that.

27 Q. Mr Taylor, you're assuming it was a paraphrased part.
28 Isn't that right?

29 A. Well, I don't see the full statement. Where is

1 Mr Massaquoi's statement?

2 Q. Well, Mr Taylor, what indicates there was anything more to
3 his statement?

4 A. Well --

15:55:49 5 PRESIDING JUDGE: Could we return to the questions as they
6 are relevant and actual instead of these hypothetical comments,
7 please?

8 MS HOLLIS: We will certainly do that. We were simply
9 following up those questions because in our view the witness is
10 playing games with words and not being straightforward. We will
11 move on. Now, Madam President, we would ask that you mark for
12 identification this one page extract, 14 March, and I believe
13 that would be 334K.

14 PRESIDING JUDGE: That's correct. Yes, Sierra Leone Web
15:56:32 15 article, 14 March 1998, is marked MFI-334K.

16 MS HOLLIS:

17 Q. Now, Mr Taylor, in June 1998 President Kabbah was back in
18 power in Sierra Leone. Isn't that correct?

19 A. That is correct.

15:56:56 20 Q. And in June 1998 the Sierra Leone government publicly
21 stated that it considered your Liberia to be an unmitigated
22 disaster for Sierra Leone. Isn't that correct?

23 A. Did you say the Sierra Leonean government stated that?

24 Q. That's correct.

15:57:13 25 A. I'm not aware of that statement.

26 Q. But, Mr Taylor, you were aware of that statement, weren't
27 you? That would be very important to you?

28 A. It would be important. You've asked two questions. It
29 would be important, but I'm saying I was not aware that the

1 Government of Sierra Leone made that statement.

2 Q. But that's just not true at all, is it, Mr Taylor? You
3 were aware of it. It wasn't a private statement, was it,
4 Mr Taylor?

15:57:39 5 A. Ms Hollis, I was not aware of any official statement from
6 the Government of Sierra Leone to the extent of what you just
7 quoted. I can't quote you verbatim, what you said, about an
8 unmitigated disaster, I'm not aware of that.

9 Q. You would have been briefed on such a statement, wouldn't
10 you, Mr Taylor?
15:58:01

11 A. If such an a very strong statement had been made by the
12 Government of Sierra Leone where March of 1998 had invited us to
13 attend the programme and I had been in contact with Kabbah, that
14 would have been a serious concern to me, yes.

15:58:23 15 Q. Now, Mr Taylor, let's turn to tab 30 in annex 2B. This is
16 Sierra Leone embassy in Washington, DC, testimony by Ambassador
17 John Leigh, 11 June 1998. Reconstructing Sierra Leone.
18 Testimony before the Subcommittee on Africa, Committee on
19 International Relations, Representative Edward R Royce,
15:59:08 20 California chairman, United States House of Representatives, June
21 11, 1998, by John Earnest Leigh, Sierra Leone's ambassador to the
22 United States, embassy of Sierra Leone, Washington, DC.

23 MR GRIFFITHS: Madam President, I object to the use of this
24 document. I anticipate that the passage to be relied upon is
15:59:39 25 that we can see commencing three lines from the bottom of the
26 second page, going over the page and completing that paragraph
27 and also the passage on the last page. Now, we note, in our
28 submission, both passages implicate --

29 JUDGE LUSSICK: You meant the passage on the second last

1 page. Is that right?

2 MR GRIFFITHS: Let me start again. It's the passage which
3 commences on page 2 and goes over to the third page - sorry, the
4 second last page, that's right. The second to last page, yes.

16:00:30 5 It's those two passages. Now, we say they implicate the accused
6 in the commission of this offence and consequently are relevant
7 to guilt.

8 Now, we note that this document purports to be evidence
9 given by one John Earnest Leigh, Sierra Leone's ambassador to the
16:00:54 10 United States. And we further note that this testimony was
11 allegedly given to the United States Subcommittee on Africa on 11
12 June 1998. Consequently, this evidence predates the indictment
13 and also the calling of evidence by the Prosecution. It clearly,
14 we submit, implicates the defendant in the commission of this
16:01:32 15 offence because we note the content of the passage beginning on
16 page 2, "backed by Charles Taylor of Liberia". That is at the
17 very core of this indictment. And, in our submission, if my
18 learned friend wanted to adduce this evidence, it should properly
19 have been adduced during the course of the Prosecution case by
16:01:55 20 the calling of this gentleman so that we could have had an
21 opportunity to cross-examine him as to the correctness or
22 otherwise of the opinions offered by him to this subcommittee in
23 1998. And so, in our submission, it should be ruled
24 inadmissible.

16:02:17 25 PRESIDING JUDGE: Your response, Ms Hollis?

26 MS HOLLIS: Thank you, Madam President. First of all, it's
27 very nice of Defence counsel to tell the Prosecution what parts
28 it was going to use. The part that it was going to use was on -
29 this is not a numbered document, but it would be at page - the

1 fourth page of the document under paragraph number 7.

2 PRESIDING JUDGE: Ms Hollis, we all have several pages of
3 this document, but there are marks in the margin which I believe
4 are marks of the excerpts that the Prosecution intends to use.

16:03:02 5 Would I be wrong in that assumption?

6 MS HOLLIS: At various times, Madam President, but not at
7 the same time. And we would draw your attention to a portion
8 that we intended to use at this time, which is the portion that
9 is under paragraph 7, "Nigeria and Liberia", which in the

16:03:23 10 document that I have before me is on - what is the fourth page of
11 that document. There is a paragraph - part of a paragraph or the
12 full paragraph marked there under number 7, "Nigeria and
13 Liberia". That is the portion to which we would refer at this
14 time.

16:03:54 15 PRESIDING JUDGE: I thought you had started your question
16 by referring to the second page, the bottom paragraph that says
17 "in March 1991".

18 MS HOLLIS: No, that was the Defence counsel's argument. I
19 had started by showing what the document is by going to page 1
16:04:12 20 and setting out the heading and who was making the statement, and
21 then Defence counsel argued about what was marked on the second
22 page and the third page, but I had made no reference to that. My
23 reference is contained in what is the fourth page, the document
24 that is marked there, "President Charles Taylor's Liberia is an
16:04:44 25 unmitigated disaster for Sierra Leone."

26 MR GRIFFITHS: Can I make it plain for the avoidance of all
27 doubt that I'm objecting to both passages, including that passage
28 on page 4 under the subheading "Nigeria and Liberia" which is
29 marked. I am objecting to that for the same reason.

1 PRESIDING JUDGE: Ms Hollis, then respond to that
2 objection, please.

3 MS HOLLIS: Yes, thank you. Madam President, again, we are
4 intending to ask your Honours to consider this document, this
16:05:19 5 portion of this document, for impeachment and it is based on -
6 this accused claims before you at great length during his direct
7 examination that he was the point guard for peace in Sierra
8 Leone, chosen to be so, chosen to carry out all of these peace
9 related activities and that he was recognised in this capacity
16:05:45 10 and, furthermore, that there is some huge conspiracy, basically,
11 on the part of western countries to try to picture him in a light
12 other than this peacemaker role and that it is really these
13 western countries who are responsible for this image they're
14 trying to portray for him.

16:06:07 15 Now, what we are attempting to do with this line of
16 questioning and these documents is to show that African leaders,
17 including those in Sierra Leone, had a very different view of
18 Mr Taylor and his role in Sierra Leone, that he has not been
19 truthful to your Honours in his testimony about his role and how
16:06:33 20 all of these other leaders were aware of this role and we are
21 attempting to impeach him on this. And insofar as our ability to
22 do so, even in light of theoretical possibilities that this is
23 probative of guilt, we would rely on the former submissions that
24 we have made.

16:06:56 25 But, again, we are attempting to use this to impeach him on
26 his characterisation of himself that he put before you in great
27 detail during his direct examination. That is the purpose of
28 this document. And we believe in order to effectively test the
29 credibility of this witness's testimony that it is important that

1 your Honours have the benefit of the information in such a
2 document before you.

3 PRESIDING JUDGE: Thank you. I will confer.

4 [Trial Chamber conferred]

16:08:06 5 PRESIDING JUDGE: The Chamber is of the unanimous view that
6 the passage found on the fourth page of this document definitely
7 has content that is probative of the guilt of the accused. It
8 goes directly to the indictment. The content of this passage is
9 new information that was not or didn't form part of the
16:08:33 10 Prosecution's case in chief and it is immaterial that the
11 Prosecution intends to use this only to prove - or to impeach the
12 credibility of the witness.

13 As far as the Bench is concerned, the decision of the
14 Chamber of 30 November requires the Prosecution to satisfy the
16:09:05 15 two-prong test and, in our view, this has not been done and so we
16 disallow the use of this document at this time.

17 MS HOLLIS:

18 Q. Now, Mr Taylor, contrary to what you have told these
19 judges, in June 1998 the Government of Sierra Leone's view was
16:09:24 20 that your influence in Sierra Leone had been a totally negative
21 influence. Isn't that correct?

22 A. I had no knowledge of that, no.

23 Q. And, indeed, that you had been a disaster for Sierra Leone
24 because of your conduct in relation to Sierra Leone. Isn't that
16:09:47 25 correct, Mr Taylor?

26 A. I had no knowledge of that view from the Government of
27 Sierra Leone.

28 Q. And, of course, Mr Taylor, you had knowledge of that. That
29 would be very important to you in your role as point President

1 for peace. Isn't that right?

2 A. If I had knowledge of it, it would be of serious
3 importance, yes.

4 Q. And, indeed, you had such knowledge, did you not?

16:10:09 5 A. I had no knowledge of that from the Government of Sierra
6 Leone. None.

7 Q. And indeed it was true, was it not, Mr Taylor, that your
8 involvement in Sierra Leone had been an unmitigated disaster for
9 that country?

16:10:22 10 A. What is your question?

11 Q. Well, let me say again: And indeed it was true, wasn't it,
12 Mr Taylor, that your involvement in Sierra Leone had been an
13 unmitigated disaster for that country?

14 A. Well, that's two questions, but I will just say that I was
16:10:38 15 not involved in Sierra Leone, so I would just say no.

16 Q. And you were well aware of the views of that country in
17 June 1998. Isn't that right, Mr Taylor?

18 A. No, I was not aware of the government's view that I was -
19 no.

16:10:58 20 Q. Now, Mr Taylor, earlier we had talked about Jerry Rawlings
21 and his condemnation of your conduct, and indeed he was very
22 outspoken in his condemnation of your conduct, wasn't he?

23 A. I've said that Jerry never - it is not to my knowledge.
24 Maybe there's something attributed to him or alleged. But, no,
16:11:23 25 I'm not aware of Jerry Rawlings confronting me or making a public
26 statement that I received, no.

27 Q. If we could look at tab 42 of annex 2B, please. And we see
28 here again, "Copyright 1999, IPS-Inter Press Service/Global
29 Information Network, IPS-Inter Press Service, January 18, 1999,

1 Monday. Headline: Africa politics: Liberia blamed in Sierra
2 Leone conflict. Byline: By Jeff Cooper".

3 Now, Mr Taylor, in this article it indicates, if we look at
4 the second paragraph:

16:12:57 5 "President Jerry Rawlings of Ghana has been one of the most
6 outspoken West African leaders in blaming Liberian President
7 Charles Taylor for the Freetown carnage that has claimed more
8 than 2,000 lives. Rawlings told a Liberian delegation during a
9 recent visit to the country that it was disappointing that
16:13:21 10 Liberia, which now enjoys relative peace as a result of ECOMOG's
11 peace role in its seven-year civil war that ended in 1997, was
12 now supporting rebels against the very peacekeepers in a
13 neighbouring country. 'I am receiving you with difficulty
14 because we find it difficult to believe you', President Rawlings
16:13:46 15 told the delegation, referring to Liberia's denials that it is
16 involved in the Sierra Leonean conflict. 'Lives are at stake and
17 Ghana is not going to take any treachery lying down', Rawlings
18 told Liberian Vice-President Enoch Dogolea, who delivered a
19 special message to the Ghanaian leader from Taylor on Sierra
16:14:15 20 Leone. Rawlings warned Liberia to stop supporting the rebels or
21 risk facing the full might of the sub-region."

22 Then if we look at the next paragraph:

23 "'Liberia's support for the RUF (Revolutionary United
24 Front) is a stab in the back of countries contributing troops to
16:14:40 25 ECOMOG. I am talking as a military man who is risking the lives
26 of his troops on the field and that gives no room for diplomatic
27 talks', President Rawlings said. He added he would not clothe
28 his feelings in diplomatic niceties. Ghana's Foreign Minister
29 echoed the President's sentiment. 'We cannot hide our outrage

1 and disappointment, because we cannot have a relationship that
2 presumes friendship and manifests in backstabbing', Foreign
3 Minister James Victor Gbeho said."

4 Now, Mr Taylor, Jerry Rawlings' s condemnation of your
16:15:31 5 conduct was very clear and very unqualified, wasn't it?

6 A. No. Absolutely no.

7 Q. And Mr Taylor, Jerry Rawlings doesn't mention anything
8 about your supposed role as the point President for peace, does
9 he, Mr Taylor?

16:15:44 10 A. Your question entails that he said this, and I'm saying
11 that wherever this publication is from, that's not what Jerry
12 said. So I'm not - so your question presupposes that this is
13 factual, when that is not the case.

14 Q. And, Mr Taylor, there is nothing in this article that
16:16:03 15 mentions your role as point President for peace, is there?

16 A. Well, this article doesn't mention that.

17 Q. And, Mr Taylor, there is nothing in this article that
18 applauds your efforts as the point President for peace, is there?

19 A. There's nothing in this article that says that.

16:16:20 20 Q. So, Mr Taylor, an African leader talking about an African
21 problem is condemning your conduct in regard to Sierra Leone?

22 A. I would disagree. We don't know if an African leader said
23 this. This, whatever you got this from, is not a recognised
24 paper. I don't even know Jerry - this is not the way how we
16:16:41 25 operate, so I wouldn't put - I would say no.

26 MS HOLLIS: Madam President, I would ask that this be
27 marked for identification.

28 PRESIDING JUDGE: This is an excerpt from the Inter Press
29 Service, 18 January 1999, and it is marked for identification

1 341.

2 MS HOLLIS:

3 Q. Now, Mr Taylor, during the Freetown invasion itself, this
4 ongoing invasion, the Government of Sierra Leone publicly
16:17:36 5 expressed its view that the RUF and junta, with the support of
6 various breeds of the proverbial dogs of war, had brutalised the
7 people of Sierra Leone. You recall the Government of Sierra
8 Leone expressing that view, correct?

9 A. This was not - I'm not sure as to the exact words, but
16:18:02 10 Kabbah did claim that it was the RUF and junta that carried out
11 these atrocities in Sierra Leone. I don't know the exact
12 language. I don't remember the exact language, but he did accuse
13 the two groups.

14 Q. Mr Taylor, the Government of Sierra Leone also indicated
16:18:33 15 that it was pleased that the Security Council and some of the
16 major parties had at last decided to name names and to identify
17 some of these dogs of war. Correct?

18 A. I don't recall the exact details, but if it's from any
19 official documents, that would be a step that the United Nations
16:18:57 20 would do. I don't know the specifics of it and I don't recall
21 it, but that could very well be what the UN could or would say.

22 Q. The Government of Sierra Leone, Mr Taylor, not the UN, is
23 what I'm talking about. The Government of Sierra Leone
24 expressing its views on 14 January 1999. You recall that, don't
16:19:22 25 you, Mr Taylor?

26 A. I don't know the exact date. I'm saying that the
27 Government of Sierra Leone did talk about the groups involved.

28 Q. And, Mr Taylor, you recall that on 14 January 1999 the
29 Government of Sierra Leone also indicated its hope that the

1 council and other governments would muster the courage not only
2 to expose those who supported and continued to support the
3 rebels, including the supply of arms, but also to take all
4 necessary measures to put an end to their conspiracy in the
16:20:06 5 systematic destruction of Sierra Leone. You remember the
6 Government of Sierra Leone making such a statement in mid-January
7 1999, do you not, Mr Taylor?

8 A. Exactly, but that's what we were referring to earlier. You
9 had said that Government of Sierra Leone had said that it was
16:20:22 10 happy that the council - and I'm assuming the Security Council
11 were naming names and whatever. That's what I'm referring to.
12 The council would say that. The Government of Sierra Leone was
13 desperate at the time, and they made a lot of statements. I
14 can't account for all, but that would be normal for them to say.

16:20:39 15 Q. And perhaps it would assist your recollection if we looked
16 at tab number 31 in annex 2B. We see, Mr Taylor - first of all,
17 could you bring it down so we could see the very top of the
18 document, please. "Government of Sierra Leone, 14 January 1999.
19 Political settlement of the crisis in Sierra Leone. 14 January
16:21:45 20 1999." So that we know what document we're talking about.

21 Indeed, Mr Taylor --

22 PRESIDING JUDGE: Ms Hollis, what is this document?

23 MS HOLLIS: This is a document issued by the Government of
24 Sierra Leone, 14 January 1999. It is a one-page document that we
16:22:08 25 are using here. It is not the full document issued by the
26 Government of Sierra Leone at that time. And the title is
27 "Political settlement of the crisis in Sierra Leone". 14 January
28 1999, and if we look at the third paragraph:

29 "The Government of Sierra Leone would like to state

1 categorically that while those diplomatic initiatives are
2 underway it will never abdicate its responsibility for the safety
3 and security of the people of Sierra Leone, who have been
4 brutalised by the rebels of the Revolutionary United Front (RUF)
16:23:02 5 and the former military junta, with the support of various breeds
6 of the proverbial dogs of war. In this context, the Government
7 of Sierra Leone is pleased that the Security Council, albeit
8 belatedly, and some of the major powers, have at least decided to
9 name names and identify some of these dogs of war, their kennels,
16:23:27 10 and their objectives. We hope that the council and other
11 governments would muster the courage not only to expose all those
12 who supported and continued to support the rebels, including the
13 supply of arms, but also to take all necessary measures to put an
14 end to their conspiracy in this systematic destruction of Sierra
16:23:45 15 Leone."

16 So, Mr Taylor, you do remember this document issued by the
17 Government of Sierra Leone on 14 January insofar as the portion
18 we have just gone over, correct, Mr Taylor?

19 A. No, I do not [microphone not activated].

16:24:13 20 Q. Mr Taylor, you were aware of this because of your role as
21 point President for peace, correct?

22 A. I did not get - my first statement didn't go on the record.
23 I did not get a copy of this official document from the
24 Government of Sierra Leone. If it is.

16:24:30 25 Q. Mr Taylor, when the Government of Sierra Leone was speaking
26 about exposing those who supported and continued to support the
27 rebels and taking all necessary measures to put an end to their
28 conspiracy in the systematic destruction of Sierra Leone, that
29 included your involvement in Sierra Leone, did it not, Mr Taylor?

1 A. I cannot read their minds. If they wanted to say that,
2 they would have said it here. I cannot say that with any
3 certainty.

4 MS HOLLIS: Madam President, if I could ask this to be
16:25:11 5 marked for identification.

6 PRESIDING JUDGE: The document entitled "Government of
7 Sierra Leone, 14 January 1999" is marked MFI-342.

8 MS HOLLIS:

9 Q. Indeed, Mr Taylor, in a letter that it presented - or a
16:25:36 10 statement that it presented to the Security Council shortly
11 thereafter, the Government of Sierra Leone continued to express
12 your involvement in Sierra Leone in a negative way. Isn't that
13 right?

14 A. Well, it depends. There were negative and positive. Like
16:25:57 15 if we go back to 1998 when Okelo --

16 Q. Mr Taylor, we're talking about a statement issued shortly
17 after this 14 January statement we have talked about and in this
18 statement shortly after the 14 January 1999 statement we have
19 just talked about, the Government of Sierra Leone continued to
16:26:21 20 characterise your involvement regarding Sierra Leone in a very
21 negative fashion, did it not?

22 A. Not that I know of. There were negatives, there were
23 positive, confusion. We always had difficulties.

24 Q. Mr Taylor, a statement by the Government of Sierra Leone
16:26:45 25 which was then sent to the United Nations and addressed to the
26 President of the Security Council and then was incorporated in a
27 Security Council document, you would have been aware of such a
28 statement, would you not, Mr Taylor?

29 A. Yes, I would be aware of such a statement.

1 Q. You would have reviewed such a statement that was contained
2 in this United Nations document, wouldn't you have, Mr Taylor?

3 A. The chances are I would have reviewed it.

4 Q. And you were aware of this document, were you not,
16:27:15 5 Mr Taylor, this statement dated 16 January 1999?

6 A. Yes, yes.

7 Q. And it was forwarded by letter dated 21 January 1999 from
8 the charge d'affaires AI of the permanent mission of Sierra Leone
9 to the United Nations, addressed to the President of the Security
16:27:44 10 Council. You remember that, don't you, Mr Taylor?

11 A. I acknowledged that a letter went back. Remembrance. I
12 acknowledge.

13 Q. And this information about the forwarding of this statement
14 and the statement itself were then contained in a United Nations
16:28:01 15 Security Council document dated 22 January 1999. You remember
16 that, don't you, Mr Taylor?

17 A. Yes, I do.

18 Q. That would have been the document S/1999/68. Do you
19 remember that, Mr Taylor?

16:28:15 20 A. I don't remember the exact numbers, but I remember the
21 document.

22 Q. And the annex to that was the statement by the Government
23 of Sierra Leone dated 16 January 1999. Correct?

24 A. The statement in question --

16:28:32 25 Q. Was an annex to that --

26 A. Yes.

27 Q. -- document, correct?

28 A. All it is here is a copy of the letter sent, yes.

29 Q. And in that 16 January 1999 statement the Government of

1 Sierra Leone portrays your involvement in Sierra Leone in very
2 negative terms, does it not?

3 A. Yes.

16:28:59

4 Q. And, indeed, in that statement it does not portray your
5 involvement in Sierra Leone in any positive terms at all, did it?

6 A. In that document, no.

7 Q. And it made no mention on 16 January 1999 of your being the
8 point President for peace, did it, Mr Taylor?

9 A. I didn't see it in there, no.

16:29:21

10 MS HOLLIS: Madam President, it may be that we're out of
11 time.

12 PRESIDING JUDGE: Yes, Ms Hollis, we have just about half a
13 minute to go. I think this would be a good time to adjourn and
14 simply to remind you, Mr Taylor, that you are not to discuss your
15 evidence. So the Court is adjourned to tomorrow at 9.30.

16:29:37

16 [Whereupon the hearing adjourned at 4.30 p.m.
17 to be reconvened on Tuesday, 19 January 2010 at
18 9.30 a.m.]

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I N D E X

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CROSS-EXAMINATION BY MS HOLLIS 33397