



Case No. SCSL-2003-01-T

THE PROSECUTOR OF  
THE SPECIAL COURT  
V.  
CHARLES GHANKAY TAYLOR

FRIDAY, 26 FEBRUARY 2010  
9.00 A.M.  
TRIAL

TRIAL CHAMBER II

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Before the Judges:

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

For Chambers:

Ms Erica Bussey

For the Registry:

Ms Rachel Irura  
Ms Zainab Fofanah

For the Prosecution:

Ms Brenda J Hollis  
Mr Nicholas Koumjian  
Mr Mohamed A Bangura  
Ms Maja Dimitrova

For the accused Charles Ghankay Taylor:  
Mr Courtenay Griffiths QC  
Mr Morris Anyah

1 Friday, 26 February 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.00 a.m.]

09:00:37 5 PRESIDING JUDGE: Good morning. We'll take appearances  
6 first, please.

7 MR KOUMJIAN: Good morning, Madam President, your Honours,  
8 counsel opposite. For the Prosecution this morning, Brenda J  
9 Hollis, Mohamed A Bangura, Maja Dimitrova and myself Nicholas  
09:01:36 10 Koumjian.

11 MR ANYAH: Good morning, Madam President. Good morning,  
12 your Honours. Good morning, counsel opposite. Appearing for the  
13 Defence this morning are Courtenay Griffiths QC and myself Morris  
14 Anyah. Thank you.

09:01:49 15 PRESIDING JUDGE: Thank you. Mr Witness, this morning  
16 we're going to continue with your evidence and I remind you that  
17 you are still under oath to tell the truth.

18 THE WITNESS: Thank you, your Honour.

19 WITNESS: YANKS SMYTHE [On former oath]

09:02:02 20 CROSS-EXAMINATION BY MR KOUMJIAN:

21 Q. Good morning, Mr Witness.

22 A. Morning, counsel.

23 Q. Sir, do you consider yourself a loyal supporter of Charles  
24 Taylor?

09:02:14 25 A. Can you be specific, what time are you talking about?

26 Q. Well, let's start with from 1989 through 2003?

27 A. Yes, I consider myself as a loyal supporter of Charles  
28 Taylor.

29 Q. And today do you consider yourself a loyal supporter of

1 Charles Taylor?

2 A. Yes, I still support Charles Taylor as my former leader.

3 Q. So it would be correct you've always been and remain a  
4 loyal supporter of Charles Taylor?

09:02:44 5 A. That's correct.

6 Q. Sir, did you listen or in any way review, hear about  
7 Charles Taylor's testimony in this case?

8 A. I read on the newspapers. The ones that appear on the  
9 newspapers, yes, I read them.

09:02:59 10 Q. Did you talk to other people who were also supporters of  
11 Charles Taylor about this case?

12 A. Yes, I will talk to my friends about the case.

13 Q. Who are some of the people you would talk to about this  
14 case?

09:03:10 15 A. I don't think they will appreciate their names being  
16 mentioned in Court, but they are friends of mine.

17 Q. Well, sir, just the fact that you talked to someone about  
18 this case doesn't endanger the person. Would they be endangered  
19 in some way, in your opinion?

09:03:25 20 A. Well, I don't know whether they will appreciate for their  
21 names to be mentioned in Court. That's what I'm saying.

22 Q. Sir, I don't want to put in you a difficult position so if  
23 your Honours - if it's agreeable with your Honours I'll take the  
24 information in private session. I'm in the hands of your Honours  
09:03:53 25 whether the witness would be compelled to answer the question in  
26 open or private session. I don't mind going into private session  
27 to take the information. It seems relevant to me.

28 PRESIDING JUDGE: Mr Smythe, this is an important Court  
29 proceeding.

1 THE WITNESS: Yes, I understand that, your Honour.

2 PRESIDING JUDGE: And I'm afraid sometimes we have to say  
3 things we don't particularly like to say, but because it's a  
4 Court proceeding things have to go on record. Mr Anyah?

09:04:17 5 MR ANYAH: Madam President, I don't have all the reasons  
6 why the witness may not wish to say this in public, but I have  
7 some idea, I suspect, of possible reasons and it goes beyond this  
8 witness. The political climate in Liberia is quite tense,  
9 especially as it relates to our client, and although what this  
09:04:43 10 witness says may not affect him personally, to the extent he  
11 identifies others, given the present political situation in  
12 Liberia, as being supporters of our client or ardent followers of  
13 this trial, there might be implications for many others vis-a-vis  
14 the possibility for employment and other reasons. So we're in  
09:05:13 15 the Court's hands.

16 PRESIDING JUDGE: Mr Anyah, the question that counsel put  
17 to the witness was, "Did you talk to other people who were also  
18 supporters of Charles Taylor about this case?" Okay, I see your  
19 point. The question is to do with supporters.

09:05:32 20 MR KOUMJIAN: The Prosecution supports Mr Anyah's  
21 application simply because we want to make sure we get the full  
22 answer from the witness.

23 PRESIDING JUDGE: I think in the circumstances and given  
24 the fact that the Prosecution does not object, we can go very  
09:05:50 25 briefly into a private session for the protection of the privacy  
26 of certain persons not in this Court.

27 [At this point in the proceedings, a portion of the  
28 transcript, pages 36124 to 36126, was extracted and sealed under  
29 separate cover, as the proceeding was heard in private session.]

1 [Open session]

2 MS IRURA: Your Honour, we're in open session.

3 MR KOUMJIAN:

09:10:06 4 Q. Sir, yesterday you talked about your current situation and  
5 correct me if I am wrong, you currently have no source of income.  
6 Is that correct?

7 A. No, that is not correct.

8 Q. Okay. You are currently unemployed. Would you agree with  
9 that?

09:10:20 10 A. I'm still employed, not with salary but I'm still employed.

11 Q. Sir, why do you say you're employed?

12 A. Because I was never dismissed by the Foreign Ministry. I  
13 was recalled for reassignment.

09:10:36 14 Q. Sir, since you were recalled you've been given no work to  
15 do, correct?

16 A. Yes, I report to the Foreign Ministry, I'm not given any  
17 specific assignment, yes.

18 Q. And that reporting is something you do on your own; you're  
19 not asked to report, are you?

09:10:47 20 A. As an employee of the Foreign Minister I'm obliged to  
21 report to the Foreign Ministry every day.

22 Q. Does the Foreign Ministry ask you to come in? That's my  
23 question.

09:10:58 24 A. The Foreign Ministry doesn't have to ask me to come in.  
25 I'm an employee of the Foreign Ministry. The Foreign Ministry  
26 doesn't have to ask me to come to Foreign Ministry before I go  
27 there.

28 Q. Sir, let me repeat the question and answer my question.

29 PRESIDING JUDGE: Mr Koumjian, both of you have been asked

1 to slow down for the sake of the record please.

2 MR KOUMJIAN:

3 Q. Mr Witness, one thing I noticed, and I do this also, but  
4 what helps the court reporters is if there is a pause between  
09:11:20 5 when I speak and you speak. So please wait a second or two after  
6 my question to start your answer and I'll try to wait a second or  
7 two after your answer to start my next question.

8 A. Okay. Thank you.

9 Q. And I'll repeat the question that I asked you before. Does  
09:11:42 10 the Foreign Ministry ask you to report - to come into the Foreign  
11 Ministry?

12 A. Foreign Ministry don't have to ask me to report as far as  
13 I'm employed with the Foreign Ministry.

14 Q. Sir, you are not answering my question. The question is  
09:11:58 15 very simple. The question is isn't it true the Foreign Ministry  
16 does not ask you to come in to the office?

17 A. The Foreign Ministry doesn't have to ask me to come to the  
18 foreign office. I was recalled to the Foreign Ministry so I have  
19 to report there.

09:12:18 20 Q. Sir, I think from your answer it's clear what the truth of  
21 the matter is.

22 MR ANYAH: Objection. Madam President, with respect, that  
23 kind of comment is unnecessary. There appears to be some  
24 communication difficulties here. Perhaps the witness is  
09:12:35 25 referring to a protocol. Perhaps counsel could inquire in other  
26 ways. There might be protocols involved in this. But to say  
27 that - what was the last comment? That the record is quite clear  
28 about the truth of the matter; that's not necessary. That's for  
29 your Honours.

1           PRESIDING JUDGE: Mr Koumjian, I think the answer is far  
2 from clear. The questions that you have - frankly even I don't  
3 understand when you say does the ministry ask you to come to  
4 work, I don't know what that means. Do you mean on a daily  
09:13:13 5 basis, or what are you asking? To which the witness has answered  
6 - given the answer that he's given. But what is the question  
7 exactly?

8           MR KOUMJIAN: Thank you, your Honour:

9 Q. Mr Witness, you are not considered by the Foreign Ministry  
09:13:33 10 an employee of the Foreign Ministry, correct?

11 A. No, that's not correct.

12 Q. Did the Foreign Ministry ever tell you to report to the  
13 office since you were recalled?

14 A. When you are recalled the letter states you are recalled  
09:13:48 15 for reassignment at the Foreign Ministry, so you have to report  
16 at the Foreign Ministry. Until you are asked - you are told that  
17 you are dismissed or your service is terminated, you have to  
18 report at the Foreign Ministry, so long you are recalled.

19 Q. Sir, why do you say you have to report at the Foreign  
09:14:03 20 Ministry?

21 A. Yes, because I'm an employee of the Foreign Ministry. I  
22 was recalled for reassignment. I came - I was asked to report at  
23 the Foreign Ministry, so I make sure I report at the Foreign  
24 Ministry every day until I can be asked that I'm no more needed  
09:14:17 25 there or I'm reassigned.

26 Q. Remember to pause after my question before you begin your  
27 answer and speak slowly. Sir, the fact of the matter is, when  
28 Foreign Ministry personnel are recalled and given no assignment  
29 for three months, they are no longer an employee of the Foreign

1 Ministry.

2 A. That's not --

3 Q. That's the rules, isn't it?

4 A. That's not correct.

09:14:43 5 Q. Sir, are you working?

6 A. Yes, I'm working, yes.

7 Q. What is the job that you - what job or jobs do you have  
8 now?

9 A. I'm assigned with the Foreign Ministry. I'm a recalled  
09:14:54 10 foreign service officer.

11 Q. Any other employment? Any employment?

12 A. No.

13 Q. So what is the salary that you earn, sir?

14 A. I don't earn any monthly salary.

09:15:04 15 Q. And you are asked to do no work, correct?

16 A. I don't understand what you say I'm asked to do no work. I  
17 don't know what you mean.

18 Q. Does anyone ask you to do any work for the Foreign  
19 Ministry?

09:15:18 20 A. Counsel, I don't know what you are trying to drive at, but  
21 I'm telling you - I keep telling you I'm a recalled foreign  
22 service officer. I've never been dismissed by the Foreign  
23 Ministry. I was recalled to report at the Foreign Ministry and  
24 this is what I do every day. I report to the Foreign Ministry  
09:15:33 25 every day, except in cases that I have other things to do.

26 Q. And when you say you report to the Foreign Ministry, what  
27 do you do?

28 A. I report to the Foreign Ministry. That's the place that I  
29 - we sit at the Foreign Ministry. I'm not the only person. In



1 fact, we have a lot of recalled foreign officers that don't have  
2 assignment and they are in the same circumstances like me.

3 Q. Sir, where do you sit?

4 PRESIDING JUDGE: Please remember to slow down a bit when  
09:15:58 5 you are giving your answer.

6 THE WITNESS: Thank you, your Honour.

7 MR KOUMJIAN:

8 Q. Sir, where do you sit when you go to the Foreign Ministry?

9 A. I can sit at the European Affairs. I can sit at the  
09:16:08 10 Afro-Asian Bureau.

11 Q. So you sit in the public areas of the ministry, correct?

12 A. That's not public areas of the ministry. These are offices  
13 that I can sit.

14 Q. Do you have friends in those offices?

09:16:17 15 A. I have colleagues in those offices, yes.

16 Q. And you perform no duties other than sitting there; is that  
17 correct? Sir, do you understand the question?

18 A. I can't answer that.

19 Q. You cannot? Why can't you answer it?

09:16:43 20 A. Yeah, because the question - I don't understand what the  
21 question means.

22 Q. Do you understand the word "duties"?

23 A. Yes, I know what duties are.

24 Q. Well, the question was: "You perform no duties other than  
09:16:54 25 sitting there; is that correct?"

26 A. I'm not assigned any duties to perform, so I'm sitting  
27 there, yes.

28 Q. And performing no other duties, correct?

29 A. That's correct, yes.

1 Q. And this is your only employment?

2 A. Yes.

3 Q. Do you have any other source of income?

4 A. Yes.

09:17:16 5 Q. What is that, sir?

6 A. I have a commercial vehicle running, reporting every day.

7 Q. If I understood your answer, you said you have a commercial  
8 vehicle running, reporting every day. Is that what you said?

9 A. Yes, reporting money. It's a commercial vehicle that runs  
09:17:34 10 as a commercial vehicle and every day reports money to me.

11 Q. Well, sir, explain what you mean.

12 A. What do I mean? A taxi is some - if a taxi runs in the day  
13 and if you own a taxi, when the driver runs in the evening, he  
14 comes and report to you, depending on the agreements you make to  
09:17:55 15 be reporting on a daily basis.

16 Q. So you own a taxi?

17 A. Yes, I do, yes.

18 Q. Any other sources of income?

19 A. No.

09:18:00 20 Q. And, sir, this taxi is a vehicle that you own personally?

21 A. Yes, it's my personal vehicle.

22 Q. And how much - and you hire a driver to work for you?

23 A. I will not tell you that. That's my privacy. I will not  
24 tell you that.

09:18:17 25 Q. Do you drive the taxi?

26 A. I don't drive a taxi. I hire a driver.

27 Q. Sir, how much money a week do you earn from this business?

28 A. I'm not in the - I will not tell you that. That's my  
29 privacy. I will not tell you that.

1           PRESIDING JUDGE: Mr Witness, these are not questions that  
2 are asked in vain. There is a reason why counsel is asking these  
3 questions. This is a court proceeding. It's not a tete-a-tete  
4 we are having and I'm afraid you have to answer this question.

09:18:57 5           THE WITNESS: Your Honour, if you compel me to answer, I  
6 will answer.

7           PRESIDING JUDGE: I am come compelling you.

8           THE WITNESS: Okay, I will do so.

9           PRESIDING JUDGE: Mr Koumjian, please ask again.

09:19:07 10          MR KOUMJIAN:

11 Q.       Sir, how much money per week do you earn from this taxi?

12 A.       The taxi reports 1,500 Liberia dollars every day.

13 Q.       What is the current exchange rate between Liberian dollars  
14 and United States dollars?

09:19:23 15 A.       Well, up to the time I was leaving, it was 68, 69 to 70. I  
16 don't know what it is now.

17 Q.       How many people do you support, sir?

18 A.       I support about seven, eight persons.

19 Q.       Now, sir, you talked about - excuse me. When did you buy  
09:19:57 20 the taxi?

21 A.       I can't remember when, but it's been quite some time now.

22 Q.       How much did you pay for it?

23 A.       I don't know whether I should answer that. But why would  
24 you want to know how much I bought my taxi?

09:20:19 25          PRESIDING JUDGE: I said it before, Mr Witness, unpleasant  
26 as it may appear to you, these are relevant questions in  
27 cross-examination. If you don't remember, you can say you don't  
28 remember, but you cannot refuse to answer a question.

29          THE WITNESS: Thank you, your Honour.

1 PRESIDING JUDGE: So please answer the question.

2 THE WITNESS: I don't remember.

3 MR KOUMJIAN:

4 Q. Sir, do you receive money from anyone?

09:20:49 5 A. When you say do I receive money from anyone, what do you  
6 mean? Can you be quite clear?

7 Q. Yes, sir. Aside from the taxi employee, does anyone else  
8 give you money?

9 A. No, nobody give me money.

09:21:10 10 Q. Sir, you said you were head of an association of recalled  
11 foreign service employees; is that correct?

12 A. Yes, I said so, yes.

13 Q. So all of these are people that the Foreign Ministry is not  
14 giving any work to, correct?

09:21:25 15 A. Yes, most of them. Some of them are reassigned, but not  
16 all of them.

17 Q. And most of them - or correct me if I am wrong. What  
18 percentage of them worked for Charles Taylor?

19 A. I don't know what percentage of them worked for Charles  
09:21:39 20 Taylor.

21 Q. The vast majority of them worked for Charles Taylor,  
22 correct?

23 A. What do you mean when you say "worked for Charles Taylor"?

24 Q. They were employed during Charles Taylor's presidency in  
09:21:51 25 the Foreign Ministry, correct?

26 A. Most of them, yes, were employed before and during Charles  
27 Taylor's administration.

28 Q. Is Tiagen Wantee one of those in the association?

29 A. No, Tiagen Wantee is not.

1 Q. Is he now with the Foreign Ministry?

2 A. No, Tiagen is not with the Foreign Ministry.

3 Q. Was he a Foreign Ministry employee when you were?

4 A. No, he was not a Foreign Ministry employee when I was.

09:22:23 5 Q. Sir, Tiagen Wantee was the ambassador to Guinea during  
6 Charles Taylor's presidency; isn't that correct?

7 A. Yes, he was ambassador --

8 MR ANYAH: Objection. Objection.

9 PRESIDING JUDGE: What is the objection?

09:22:35 10 MR ANYAH: Objection is, it assumes a fact not in evidence.

11 I don't believe the record in this case shows Mr Wantee - may I  
12 finish, please, counsel. I don't believe the record shows, from  
13 July 1997 through 2003, when President Taylor left office, that  
14 Tiagen Wantee was the only Liberian ambassador to Guinea. That's  
09:22:58 15 the objection. The question assumes that fact.

16 PRESIDING JUDGE: Mr Anyah, this is cross-examination.  
17 Counsel can put a proposal to the witness and the witness is  
18 perfectly capable of either agreeing or disagreeing with that  
19 proposal. The cross-examination does not have to come out of the  
09:23:17 20 evidence-in-chief per se.

21 MR ANYAH: Madam President, I appreciate that. I respect  
22 that. The issue is whether the question can mislead the witness.  
23 The question - and I'll read the question. May I - I'm  
24 addressing the Court. Unless the Presiding Judge says I should  
09:23:35 25 sit down --

26 PRESIDING JUDGE: It's okay. Please continue.

27 MR ANYAH: Let me look for the question. Yes, the  
28 question, my page 19 of LiveNote, starting at line 6:

29 "Q. Sir, Tiagen Wantee was the ambassador to Guinea during

1 Charles Taylor's presidency; isn't that correct?"

2 Now, what does "Charles Taylor's presidency" mean? It  
3 means from 1997 through 2003. The facts in the record -  
4 transcripts, do they show that to be the case?

09:24:06 5 PRESIDING JUDGE: Mr Anyah, if you look at the line  
6 immediately after the question, the witness was about to say,  
7 "Yes, he was ambassador," and before he finished explaining his  
8 answer, you were interrupting.

9 MR ANYAH: I have no qualms with the fact that he could  
09:24:22 10 have answered and would have answered it, yes. I am simply  
11 saying that we as counsel, we have the propensity, depending on  
12 how you phrase the question, that we could mislead a witness.  
13 And in this case, if your Honours want the facts as they were,  
14 this question misleads the witness. That's my objection. There  
09:24:41 15 are no facts in the record to support that Tiagen Wantee was the  
16 ambassador to Guinea for the entire six years of President  
17 Taylor's presidency.

18 PRESIDING JUDGE: Okay. This is going to be my ruling and  
19 I don't want to hear from the Prosecution - I don't need to hear  
09:24:55 20 from the Prosecution: My own view is that the question is  
21 straightforward. It is not misleading. This witness was in  
22 Liberia during the presidency of Charles Taylor. He worked  
23 pretty close. He seems well acquainted with the government of  
24 the day and he's perfectly capable of answering this question.  
09:25:19 25 If he thinks that the proposal is not accurate, he's capable of  
26 saying so. So please answer the question as put, which was:  
27 "Tiagen Wantee was the Ambassador to Guinea during Charles  
28 Taylor's presidency; isn't that correct?"

29 THE WITNESS: He was one time ambassador in Guinea during

1 Taylor's presidency.

2 MR KOUMJIAN:

3 Q. He was ambassador until 2001, correct?

4 A. I can't remember as far as when he served as ambassador.

09:25:50 5 Q. He was ambassador until he was expelled by Guinea for  
6 actions against the State; is that correct?

7 A. I have no idea about that.

8 Q. Sir, you were in the Foreign Ministry and you don't know  
9 about that?

09:26:00 10 A. I don't have any idea about that.

11 Q. So you're not aware of what was going on in the Foreign  
12 Ministry or the foreign embassies of Liberia when you were in  
13 Libya; is that correct?

14 A. That's not correct.

09:26:19 15 Q. Sir, do you consider yourself still working for Charles  
16 Taylor?

17 A. I don't work for Charles Taylor.

18 Q. When did you stop working for Charles Taylor?

19 A. I stopped working for Charles Taylor from the time he left  
09:26:32 20 Liberia.

21 Q. Could I have page 35653 of 22 February, please, put on the  
22 screen. Sir, reading from line 2, you were asked by Mr Anyah:

23 "Q. Well, when was the last time you worked closely with  
24 Mr Taylor?"

09:27:39 25 A. I've always worked closely with Mr Taylor."

26 Is that correct as to what you said Monday?

27 A. Yes, I have always worked closely with Mr Taylor during his  
28 presidency. Yes, that's correct.

29 Q. And when Mr Taylor left Liberia, when was the next time you

1 had contact with him?

2 A. Since Mr Taylor left Liberia, I never had contact with  
3 Mr Taylor.

4 Q. Did you ever visit him in Nigeria?

09:28:05 5 A. I never visited him in Nigeria.

6 Q. Did you ever speak to him on the phone?

7 A. I never spoke to him on the phone.

8 Q. Sir, when was the first time you had contact with any  
9 representatives for the defence of Charles Taylor?

09:28:24 10 A. The last time I had contact with any representative of the  
11 defence of Charles Taylor was when I arrived here when I was  
12 being rehearsed by the Defence counsel.

13 PRESIDING JUDGE: Mr Koumjian, I hope you are not being  
14 ambiguous here when you say the defence of Charles Taylor. You  
09:28:40 15 could be ambiguous. There is a group, an informal group that  
16 goes by the acronym Defence of Charles Taylor. Is that what  
17 you're referring to?

18 MR KOUMJIAN: I'll clarify, your Honour, thank you:

19 Q. Sir, my question was - and I'm sure you just didn't hear me  
09:29:01 20 correctly. The question was when was the first time, and let me  
21 clarify what I mean, that you had contact with anyone you  
22 understood to be a lawyer or investigator for Charles Taylor?

23 A. It was in 2009, if I'm not mistaken, when the Defence  
24 lawyers came to Monrovia. That was the first time I met with  
09:29:23 25 them.

26 Q. And you never met any of the members of the Defence team  
27 before that time?

28 A. No.

29 Q. Sir, did you attend a press conference of the Defence team



1 in 2007?

2 A. Of the Defence team?

3 Q. Yes.

4 A. Yes, I attended a press conference, yes.

09:29:41 5 Q. Did you meet the Defence team at that time?

6 A. Yes, the Defence team asked to talk to me, yes, and I  
7 talked to them at the time.

8 Q. Sir, did you come here to tell the judges the truth about  
9 what happened regardless of whether or not it helped or hurt

09:29:59 10 Charles Taylor?

11 A. I have come here to say nothing but the truth. As a Muslim  
12 I swore to the Bible - sorry, I swore to the Koran to tell the  
13 truth and I'm not saying anything besides the truth here.

14 Q. And you will say it whether or not it contradict Charles  
09:30:16 15 Taylor. Is that correct?

16 A. I'm speaking nothing but the truth whether or not it  
17 contradicts him.

18 Q. Thank you, sir. Sir, please tell the judges about children  
19 in the NPFL. What do you know about children in the NPFL?

09:30:29 20 A. I don't understand your question.

21 Q. Were there any children in the NPFL that you know about,  
22 Mr Witness?

23 A. No, I don't know of any children in the NPFL.

24 Q. What were the ages of the members of the NPFL fighting  
09:30:42 25 forces?

26 A. All the NPFL fighting forces that I know are above the age  
27 of 18.

28 Q. Sir, that's not the truth, is it?

29 A. Are you suggesting that I'm lying?

1 Q. Yes, sir, that's exactly what I'm suggesting.

2 A. I'm not lying. I'm speaking the truth. You were not  
3 there, I was there and I'm telling you what I saw there and the  
4 truth that I'm saying. So if you will suggest that I'm lying,  
09:31:03 5 that is not fair to me.

6 Q. Sir, everyone who was in Liberia during the time period  
7 that you were is aware of the NPFL having child soldiers in their  
8 ranks. Isn't that true?

9 A. That's not true. That's not correct. That's not correct.

09:31:18 10 MR ANYAH: Objection. Objection. I object to the form of  
11 the question. How can counsel say that everyone in Liberia was  
12 aware of something?

13 PRESIDING JUDGE: Really I've said this before that counsel  
14 in cross-examination can put a proposal to the witness and the  
09:31:41 15 witness is quite capable of answering. And he has answered.  
16 Please proceed.

17 MR KOUMJIAN:

18 Q. Well, sir, let's go over some testimony in this case and  
19 compare it to what you say and you can tell us whether these  
09:31:57 20 other witnesses are all liars or whether what they are saying is  
21 the truth. I would like to start, please, by putting on the  
22 screen the transcript from 10 January 2008 starting at page 987,  
23 line 23 at the bottom. Sir, this was a witness Varmuyan Sherif.  
24 You know him, correct?

09:32:47 25 A. Yes, I know Varmuyan Sherif.

26 Q. And this is what he was asked when he testified on 10  
27 January, line 23:

28 "Q. You were asked this morning about the phrase  
29 civilians don't have blood. Do you remember that?"

1 A. I don't know.

2 Q. Sir, I'm reading the testimony to you of Mr Sherif.

3 A. Sorry.

4 Q. Just so you understand this. When I finish, I will let you  
09:33:16 5 know.

6 PRESIDING JUDGE: Mr Smythe, you can follow, I think, on  
7 the transcript from line 23.

8 THE WITNESS: Yes, thank you, your Honour.

9 MR KOUMJIAN:

09:33:25 10 Q. Do you see it, sir?

11 A. Yes, I see line 23, yes.

12 Q. The question was:

13 "Q. You were asked this morning about the phrase civilians  
14 don't have blood. Do you remember that?

09:33:38 15 A. Yes.

16 Q. And in answer to that question this morning at 11.20  
17 you told us that all the warring factions adopted that  
18 attitude. Is that right?

19 A. Yes.

09:33:55 20 Q. And did that include ULIMO?

21 A. Yes.

22 Q. And you see that's what I want to ask you about,  
23 because ULIMO used child soldiers, didn't they?

24 A. All warring factions used child soldiers."

09:34:24 25 Mr Witness, Mr Sherif told the truth to this Court,  
26 correct?

27 A. That is what you believe, but to me it's not the truth.

28 Q. Is there is question of interpretation? Did all warring  
29 factions use child soldiers or not?

1 A. NPFL never used child soldiers.

2 MR KOUMJIAN: Your Honour, could I have MFI-4, please? Is  
3 that possible to be put on the screen?

4 Q. We see this is a copy of the New African, October 1992.

09:36:35 5 Sir, I'm going to read from the last paragraph in the first  
6 column at the bottom of the first column to the left. First I  
7 should tell you that this journalist as we see at the top is  
8 Baffour Ankomah. Did you know him, Mr Witness?

9 A. I don't know him.

09:37:05 10 Q. But you were with Charles Taylor from what time?

11 A. The time I mentioned in court yesterday, from 1990 --

12 Q. From when in 1990?

13 A. From between March, April 1990 onwards.

14 Q. And you were with him as a bodyguard, so you knew everyone  
09:37:23 15 that was close around him, correct?

16 A. Yes.

17 Q. You don't know Baffour Ankomah?

18 A. I don't know Baffour Ankomah.

19 Q. Here is what Baffour Ankomah - we are reading from the top,  
09:37:36 20 it says, "Baffour Ankomah spent a month behind the lines with  
21 Charles Taylor and his forces in Liberia." Then let's go down to  
22 the bottom of the first column. He writes:

23 "Small boy soldiers (some as young as 9 and 10 years old),  
24 would put a knife to the throat of some elderly Krahn man and  
09:37:59 25 tell him, 'Popee, don't worry it won't hurt you.' In another  
26 minute his head would be gone. Some teenage soldiers (both boys  
27 and girls) told me in separate interviews that they just wanted  
28 to seek revenge for the atrocities committed against their  
29 parents whose dismembered bodies were left to rot in the open by

1 Doe's soldiers. One boy, who is now 14, told me in a disarmament  
2 camp at Kwedi n near Tappita (Nimba County), 'I returned to our  
3 village from school in Monrovia to find I had no mother, no  
4 father. They had been slaughtered like goats by Doe's men. What  
09:38:45 5 did you want me to do? Sit down and cry? I joined President  
6 Taylor's army and sought revenge.' "

7 Sir, that was true of many children particularly in Nimba  
8 County, isn't that true?

9 A. That's not true.

09:39:05 10 Q. Let's continue reading. I'm reading from the middle  
11 column, the very last line: "More of such orphans (now put  
12 together in a Small s Boys Uni t) joined Tayl or' s forces."  
13 Mr Witness, isn't it true that children in the NPFL were put into  
14 a Small Boys Uni t?

09:39:40 15 A. That's not correct. NPFL never had children within their  
16 ranks.

17 Q. Sir, you had a Small Boys Uni t, didn't you?

18 A. But those are not soldiers. I had small boys that stayed  
19 with me, I feed them, I took care of them, I sent them to school.

09:39:55 20 They were not soldiers. So they were not part of the NPFL. They  
21 stayed with me, not with the NPFL.

22 Q. And you were with what organisation, sir?

23 A. I was with the NPFL but the soldiers were not with the  
24 NPFL. They stayed at my house. They don't follow me when I go  
09:40:08 25 to places.

26 Q. And you were assigned to what job at the time you had the  
27 Small s Boys Uni t?

28 A. Pardon me?

29 Q. What was your assignment when you had a Small Boys Uni t?

1 A. I was security to Mr Taylor.

2 PRESIDING JUDGE: I think the witness might have misspoken  
3 when he said, "I was with the NPFL but the soldiers were not with  
4 me."

09:40:27 5 THE WITNESS: No, not what I said. I said the boys were  
6 not soldiers. I was with the NPFL, but the boys were not with  
7 the NPFL.

8 MR KOUMJIAN:

9 Q. Sir, what did these boys do for you?

09:40:39 10 A. These are boys that stayed with me. Normally in our  
11 African settings boys stay with you, they will help to wash  
12 dishes for you, they will help to wash your clothes and they will  
13 help to go to the market for the woman in the house and many  
14 other things. They will sweep.

09:40:53 15 Q. Sir, why did you call these boys Small Boys Unit?

16 A. Because they were small so I can call them small boys.  
17 They were more than one.

18 Q. That explains why you called them small boys. Why did you  
19 call them Small Boys Unit?

09:41:07 20 A. I called them Small Boys Unit because they were a unit with  
21 me in my house.

22 Q. A unit of what?

23 A. Boys. Small boys.

24 Q. A unit implies it's a unit of some force, doesn't it; a  
09:41:21 25 unit of some greater entity?

26 A. I don't understand it to be like that. My interpretation  
27 of unit are a group of boys that stayed with me.

28 Q. And you weren't the only person to have a Small Boys Unit,  
29 were you?

1 A. I don't know of any other person having Small Boys Unit,  
2 but I know I called my boys Small Boys Unit.

3 Q. So you're the one that invented the term "Small Boys Unit"?

4 A. I don't know, you can interpret that any way, but I know I  
09:41:42 5 called my boys small boys.

6 Q. Sir, I don't want to interpret so let me ask you to be  
7 clear.

8 A. Yeah, but --

9 Q. Could you please wait for my question, sir, I haven't asked  
09:41:52 10 it yet. Let's both slow down a little bit.

11 A. Go ahead.

12 Q. Did you invent the term "Small Boys Unit"?

13 A. I used "Small Boys Unit" for the boys that stayed with me.

14 Q. I think you understand the word "invent", correct?

09:42:04 15 A. I don't have to invent that. You can call somebody some  
16 name that you don't have - it's not invent something, whatever.  
17 You can take it to be that, but I don't take it to be that. So  
18 you can't make me to be the architect of Small Boys Unit, I'm  
19 not.

09:42:17 20 Q. I'm sure you're not. I'm not saying you are. You had  
21 heard that word many times before in the NPFL, correct?

22 A. I never heard it any time before in the NPFL.

23 Q. Well then did you invent the term?

24 A. I call my boys small boys and, you know, since there are  
09:42:33 25 more than one with me I call them as a unit.

26 Q. Where did you hear this term?

27 A. I went to school and I know what is small, I know what is  
28 boys, I know what is unit.

29 Q. Did Charles Taylor have a Small Boys Unit?

1 A. I don't know of Charles Taylor having any Small Boy Unit.

2 Q. Did he have small boys with him?

3 A. I don't know Charles Taylor, besides his children and  
4 children he adopted, to have any small boys with him.

09:42:58 5 Q. Zobon Johnson, do you know him?

6 A. Zobon, yes, I know Zobon Johnson.

7 Q. How old was he when you first saw him?

8 A. I don't know Zobon - I don't know how old he was. In fact  
9 one of Zobon's brothers stayed with me. He was one of the boys  
10 with me?

09:43:13

11 Q. The question is when did you meet Zobon Johnson?

12 A. I can't understand - I can't remember when I met him, but I  
13 know him, yes, and he was in Gbarnga, I know.

14 Q. So you met him when you were in Gbarnga?

09:43:23

15 A. Yes.

16 Q. How old was he when you met him?

17 A. I don't know his age.

18 Q. Was he 10?

19 A. I don't know his age.

09:43:29

20 Q. Could he have been under 10?

21 A. I don't know his age.

22 Q. So you don't know whether or not he was under 10 years old?

23 A. Yes, I don't know.

24 MR KOUMJIAN: If we could have the transcript, please -

09:43:52

25 excuse me. If we could have MFI-192. Page 154 is what I want  
26 put on the screen, starting at the second paragraph.

27 PRESIDING JUDGE: If I may inquire, counsel, these  
28 documents that you wish to refer to in the course of your  
29 cross-examination, have you given prior notice to the Court



1 Manager of the documents?

2 MR KOUMJIAN: I tried to last night.

3 PRESIDING JUDGE: Because that is one way of using the  
4 Court's time efficiently.

09:44:39 5 MR KOUMJIAN: I understand that, and if I didn't - I did  
6 give a list. I'm not sure if all of these are on it.

7 MS IRURA: Your Honour, we did not receive prior notice of  
8 the documents counsel is using presently.

9 MR KOUMJIAN:

09:45:04 10 Q. Just so you see the cover, Mr Witness. This is a book by  
11 Herman Cohen, "Intervening in Africa". If we could go to page  
12 154. Perhaps I should ask you, Mr Witness, do you remember ever  
13 meeting that man, Herman Cohen?

14 A. Yes, I met Herman Cohen one time when he came to meet  
09:45:29 15 Mr Taylor at Loguato in Nimba County.

16 Q. Thank you. I want to start - I'm just going to read a  
17 sentence from the second full paragraph. The paragraph begins  
18 "on 20 September". I'm just going to read to you the last  
19 sentence in that paragraph:

09:46:07 20 "The most striking and frightening aspect of Taylor's  
21 forest hideaway was the overwhelming presence of heavily armed 14  
22 to 16-year-old boys."

23 Did Mr Cohen tell the truth when he said that, Mr Witness?

24 A. As far as I'm concerned, he didn't tell the truth.

09:46:30 25 Q. Were the Small Boys Units armed?

26 A. There is no Small Boy Units within the NPFL. I continue to  
27 say that.

28 Q. Were 14 to 16-year-old boys carrying guns?

29 A. There were no boys below the age of 18 within the NPFL

1 ranks that carried guns.

2 Q. Thank you. If I could have the transcript for 14 May 2008,  
3 page 9825.

4 PRESIDING JUDGE: Please proceed.

09:47:56 5 MR KOUMJIAN:

6 Q. I don't see it on my screen, but I have it in my notes. I  
7 can read, starting at the first line. If I have the wrong line,  
8 someone tell me: "Yes, the very first time seeing the small boys  
9 with arms and running around and being very unreasonable."

09:48:14 10 Sir, I should tell you, this is the testimony of Moses  
11 Blah. You know Moses Blah, correct?

12 A. Yes, I know Moses Blah.

13 Q. And Moses Blah was with the NPFL in 1990, correct?

14 A. Yes, Moses Blah was with the NPFL in 1990.

09:48:28 15 Q. In line 3 he was asked:

16 "Q. Well, did you find out from anyone why there were  
17 Small Boys Units?

18 A. No, I didn't. I considered them to be other soldiers.

19 There were other people in different units fighting much  
09:48:43 20 smaller than the Small Boy Unit. Everybody had a Small Boy  
21 Unit with them. You had little boys who were dragging your  
22 weapons behind you and they would say, 'Oh, they are my  
23 Small Boy Unit.' It was a common name to everybody."

24 Sir, is that true, the Small Boy Unit was a common name in  
09:49:08 25 the NPFL?

26 A. Are you through with your question?

27 Q. Yes, sir.

28 A. Not that I know of.

29 Q. Did you see boys 14, 13, 15, dragging weapons?

1 A. I never saw boys under the age of 18 dragging arms.

2 Q. Let's be clear. Did you ever see them carrying weapons?

3 A. I never saw them carrying weapons.

4 Q. Then he was asked:

09:49:39 5 "Q. And how old were these small boys?

6 A. Some were as young as 15, some were 13, 14, 15, and  
7 some were younger than that.

8 Q. Did anyone tell you why small boys were used?

9 A. Well, for reason I know from my own analysis I would  
09:49:57 10 say they were used because they were unreasonable and they  
11 had no sense of direction. That's all.

12 Q. And how was that a benefit to the operation?

13 A. It was fine because they could execute duly, because  
14 they were unreasonable and you would tell them anything it  
09:50:16 15 would happen immediately as you want. They were small and  
16 they had no sense of direction. They never had a second  
17 thought of anything. They would just move in and do what  
18 they can do."

19 First, let me ask you about that. Sir, in the war in 1990,  
09:50:40 20 children were traumatised, correct?

21 A. Yes, children were traumatised, yes.

22 Q. Some had lost their parents, correct?

23 A. Yes, that's correct.

24 Q. All of them had seen violence - virtually all of them,  
09:50:49 25 correct?

26 A. Obviously if somebody's parents is killed in front of them,  
27 yes.

28 Q. From what you observed, all of them were frightened and  
29 seeking protection, correct?

1 A. Yes.

2 Q. And they were vulnerable to anyone they thought could  
3 protect them, correct?

4 A. Well, they found protections, yes.

09:51:11 5 Q. And then Mr Blah was asked:

6 "Q. Do you know how they were recruited?

7 A. Well, some voluntarily would come in and some people  
8 would come along with their brothers and they would say,  
9 'Well, this is my brother. I want him to join a unit.'

09:51:29 10 And some were captured in places that we captured and the  
11 younger ones would be running around and don't know where  
12 to go. We have to - the NPFL forces would take them in and  
13 would say, 'Look, you come. I will take care of you,' and  
14 they began to build a force from them."

09:51:53 15 Sir, Mr Blah told the truth at that time about what  
16 happened when he testified about the small boys in the NPFL,  
17 correct?

18 A. To the best of my knowledge, that was not true. Moses Blah  
19 never tell the truth as far as this statement is concerned.

09:52:09 20 Q. Let me just put one more witness to you, Mr Smythe. Can I  
21 have the transcript, please, of 22 September 2008, page 16792.  
22 Do you recall Stephen Smith, a journalist, a tall Caucasian man?

23 A. I don't know who you call Stephen Smith.

24 Q. The witness testified - Mr Smith testified - I'm going to  
09:53:19 25 pick it up in the middle of a sentence, but "as a rebel  
26 movement", reading from the top of the page:

27 "A ... I mean a rebel movement moving towards the capital,  
28 obviously Mr Taylor never went on his own. He was always  
29 accompanied by security and that seemed at that time and

1 even in hindsight quite normal to us. So, we met him. His  
2 convoy stopped, the headlights on, so we had that  
3 discussion, a tumultuous discussion which lasted probably  
4 only a couple of minutes, and then we proceeded as  
09:53:52 5 Mr Taylor had ordered it to happen.

6 Q. Now, you mentioned his security was with him. What  
7 normally was the makeup of his security, if you recall?

8 A. There again to be precise, you would distinguish when  
9 Mr Taylor was on the move, or whether he was in his  
09:54:17 10 residence. In his residence it was a well-organised  
11 security setup which I did not know in detail. I can only  
12 describe it from my viewpoint as someone who came to visit  
13 him to interview him. So, you would have an outer ring of  
14 security. I would associate that fairly often with the  
09:54:37 15 Small Boys Unit, child soldiers, if I had to estimate young  
16 boys, sometimes girls, between the age of from 10, 11 up to  
17 15, 16. They would be the outer ring of security and then  
18 you had various inner rings of security, bodyguards,  
19 Liberian bodyguards. "

09:55:02 20 Mr Witness, were child soldiers part of the security of  
21 Charles Taylor?

22 A. There were never child soldiers as part of the security of  
23 Charles Taylor.

24 Q. Mr Witness, I've read to you from the book by Mr Cohen, the  
09:55:18 25 article by Mr Baffour Ankomah, the testimony of Moses Blah,  
26 Stephen Smith the journalist, and Varmuyan Sherif. Is it your  
27 testimony that all of these sources talking about child soldiers  
28 were lying and you are telling the truth?

29 A. As far as I'm concerned, they are lying and I'm telling the

1 truth.

2 Q. Thank you, Mr Witness. And that's the same conviction you  
3 have about telling the truth - it's the same for child soldiers  
4 as it is with the rest of your evidence; is that correct?

09:55:57 5 A. I swore to the Koran that I will say the truth and nothing  
6 but the truth, and I'm - all what I'm saying here is the truth  
7 and nothing but the truth.

8 Q. Sir, I want to go over your biography with you in some  
9 detail. So let's just start from the beginning just so we don't  
09:56:17 10 miss anything. You were born in The Gambia, correct?

11 A. Yes, I was born in The Gambia.

12 Q. In 1957?

13 A. That's correct.

14 Q. Where exactly were you born?

09:56:26 15 A. I was born in Salikenya.

16 Q. You attended high school?

17 A. Yes, I attended high school.

18 PRESIDING JUDGE: Sorry, what was that place again? Sally?

19 THE WITNESS: Salikenya. S-A-L-I-K-E-N-Y-A, if I'm

09:56:45 20 correct.

21 MR KOUMJIAN:

22 Q. Sir, what was the name of the high school you attended?

23 A. I attended Kerewan Secondary Technical School first and  
24 later on to the Muslim high school.

09:56:58 25 PRESIDING JUDGE: You have to speak slowly, sir. What was  
26 the name of the school?

27 THE WITNESS: I went to the Gambian Muslim high school.

28 PRESIDING JUDGE: And the high school?

29 THE WITNESS: I said I went to the Gambian Muslim high

1 school. Before I went to Kerewan Secondary Technical School.

2 PRESIDING JUDGE: That is the name that we would like you  
3 to spell.

4 THE WITNESS: K-E-R-E-W-A-N.

09:57:25 5 MR KOUMJIAN: For some reason I don't have my LiveNote.  
6 Everyone else does?

7 PRESIDING JUDGE: The judges do.

8 MR KOUMJIAN: No, I don't have anything on my screen, but  
9 I'll work on it:

09:57:43 10 Q. Mr Witness, what year did you finish high school?

11 A. I finished high school in 19 --

12 Q. Sir, perhaps I interrupted you. I'm sorry. I didn't hear  
13 your answer. What year did you finish high school?

14 A. I finished high school in 1997, '98.

09:58:04 15 Q. Well, I'm not sure I understand your answer.

16 A. I'm sorry. Excuse me. 1977, '78, sorry.

17 Q. What do you mean when you say you finished 1977 to '78?

18 A. 1977, '78 academic year.

19 Q. So you finished in 1978?

09:58:22 20 A. Yes.

21 Q. Did you graduate from high school?

22 A. Yes, I did.

23 Q. So you were 21 years old at that time; is that correct?

24 A. Well, you can tell from there I'm so. You are correct.

09:58:35 25 Q. Remind me, what was the day and month you were born?

26 A. I was born on 25 August 1957.

27 Q. And when does the academic year end? When did you  
28 graduate? In what month?

29 A. Well, I can't remember that. It's been a long time. I

1 don't know. I can't remember.

2 Q. Do you remember, does the academic year in Gambia end in  
3 approximately June, or you don't know?

4 A. I've been out of The Gambia for more than 20 years now. I  
09:59:01 5 can't remember anything in that place now.

6 Q. After you graduated in 1978 what did you do?

7 A. I graduated, I joined the education department as a  
8 teacher.

9 Q. You joined as a civil servant?

09:59:18 10 A. Yes.

11 Q. Where did you teach?

12 A. I first taught at the St Mary's primary school in Banjul.

13 Q. Slow down just a little bit, Mr Witness.

14 A. I first taught at the St Mary's primary school in Banjul.

09:59:34 15 Q. So you were teaching primary school students?

16 A. Yes.

17 Q. How long did you teach?

18 A. I spent two academic years in St Mary's. Then I was  
19 transferred to a village called Sifoe in Kombo in the Western

09:59:51 20 Division.

21 Q. In the village what was your job?

22 A. I was a teacher assigned at the school.

23 Q. So you were there in 1981?

24 A. Yes.

10:00:03 25 Q. Were you there when the coup occurred in 1981?

26 A. Yes.

27 Q. Did you have any education after high school?

28 A. I went to college briefly but I was expelled from college.

29 Q. Where did you go to college?



1 A. I went to college in The Gambia and currently I'm a student  
2 at the AME Zion University studying criminal justice.

3 PRESIDING JUDGE: What is the name of the university?

4 THE WITNESS: AME Zion University.

10:00:47 5 MR KOUMJIAN:

6 Q. Why were you expelled?

7 A. Because there was a strike.

8 Q. Can you explain that?

9 A. I said there was a strike at the college and the students  
10:01:14 10 were expelled.

11 Q. You were expelled because you went on strike?

12 A. I was among the students that took part in the strike, yes.

13 Q. So what year was this that you were in the university and  
14 in The Gambia?

10:01:36 15 A. Pardon me?

16 Q. You said you went to university in The Gambia and were  
17 expelled - college, excuse me. Thank you. My mistake. My  
18 error. The college you attended in The Gambia that you were  
19 expelled, what year did you attend?

10:01:53 20 A. I attended that university between 1980.

21 Q. Between 1980 and - the year of 1980?

22 A. I was just a freshman when I was expelled. I had just gone  
23 there in 1980. I was expelled and then I continued as a primary  
24 school teacher.

10:02:14 25 Q. And then what happened after you were assigned to the  
26 village? What next happens in your biography?

27 A. Yes. While I was there the coup took place and I took part  
28 in that coup.

29 Q. Sir, before the coup took place you were engaged in some

1 political activities. Is that right?

2 A. Yes.

3 Q. You were a member of MOJA?

4 A. Yes, I was.

10:02:36 5 Q. When did you join MOJA?

6 A. I can't remember exactly the year I joined MOJA but I was  
7 with the MOJA.

8 Q. Approximately how long before the coup had you been a  
9 member of MOJA?

10:02:48 10 A. Maybe two, three years or more.

11 Q. Did any particular person bring you into MOJA?

12 A. In school we discussed politics, you know, and at the time  
13 the MOJA groups they would distribute leaflets, so we would pick  
14 these leaflets up, we will read them, so that encouraged me to  
10:03:11 15 join their ranks.

16 Q. MOJA stands more for the Movement of Justice in Africa,  
17 correct?

18 A. Movement for Justice in Africa.

19 Q. Sir, were you interested always in politics and political  
10:03:27 20 ideology?

21 A. Yes.

22 Q. Have you taught ideology when you were either in Libya, in  
23 Burkina Faso or in Liberia?

24 A. I was not - I was taught ideology in Libya.

10:03:41 25 Q. You were taught there. But did you ever teach?

26 A. Yes, sometimes among ourselves we will sit down among  
27 ourselves, we will lecture, we will teach one - we will teach one  
28 another.

29 Q. The Movement For Justice in Africa, who founded that?

1 A. That I don't know, but it was all around Africa and I only  
2 know of the branch in The Gambia.

3 Q. You don't know that it was founded in Liberia?

4 A. I don't know. I heard it was in Liberia, but I don't know  
10:04:17 5 whether it was there that it was founded. I heard people in  
6 Liberia were within the Movement of Justice in Africa.

7 Q. The Movement of Justice in Africa was a supporter of the  
8 coup of Samuel K Doe. You learned that, didn't you?

9 A. I don't know. I don't know.

10:04:34 10 Q. Tell us, Mr Witness, what was it about the Movement For  
11 Justice in Africa you said was the title that attracted you?  
12 What about their ideology were you in agreement with?

13 A. Well, their ideology, they were always fighting for social  
14 justice, equality for everyone.

10:04:53 15 Q. So what was ideology as far as the type of government that  
16 MOJA supported?

17 A. I don't know. I don't know.

18 Q. You were a member of it. You don't know what type of  
19 government they supported?

10:05:05 20 A. At the time we didn't - our MOJA never supported the  
21 government that was in place.

22 Q. Was the MOJA - it was a socialist movement, correct?

23 A. Yes, you can say so.

24 Q. It had Marxist-Leninist roots, correct?

10:05:25 25 A. You can say so.

26 Q. In The Gambia the movement MOJA-G - that's what it's  
27 called, isn't it, The Gambia branch?

28 A. Quite correct, yes.

29 Q. That was led at one time by Koro Sallah, correct?

1 A. Yes, you are correct.

2 Q. And he had studied in the Soviet Union, correct?

3 A. I don't know where he studied but I last heard of him in  
4 Sweden and I think he is deceased now if I'm not mistaken.

10:05:45 5 Q. So did you believe in the Marxist-Leninist ideas of MOJA?

6 A. No, I didn't believe in the Marxist-Leninist ideas of MOJA.

7 PRESIDING JUDGE: Could you spell the names of that person,  
8 Mr Koumjian.

9 MR KOUMJIAN: The nickname K-O-R-O S-A-L-L-A-H:

10:06:06 10 Q. Is that correct, Mr Witness?

11 A. You can spell it. I don't know. That's your spelling.

12 Q. Koro Sallah eventually and other leaders of MOJA condemned  
13 the 1981 coup, correct?

14 A. Yes, Koro Sallah did, yes.

10:06:23 15 Q. Because the coup resulted in senseless violence, looting  
16 and killing of civilians, correct?

17 A. I'm not aware of that.

18 Q. You're not?

19 A. I'm not aware of what you are talking about, senseless  
10:06:36 20 violence, killing and looting. I'm not aware of that

21 JUDGE DOHERTY: Mr Koumjian, which coup are we talking  
22 about? There's been a reference to a Liberian one and a Gambian  
23 one.

24 MR KOUMJIAN: Thank you:

10:06:48 25 Q. I'm talking about the Gambian coup, did you understand  
26 that, Mr Witness?

27 A. Yes, I understand.

28 Q. When the coup happened about 100 persons including the  
29 President's children were taken and held hostage. Is that

1 correct?

2 A. I know the President's wife and the children were held  
3 hostage I know, but I don't know what you are talking about 100  
4 persons. I don't know that.

10:07:12 5 Q. Where were they held?

6 A. They were held at the field force depot barracks in Bakau.

7 Q. And these hostages including the wife of the President and  
8 his children, they were held until basically the coup failed when  
9 the Senegalese intervened, correct?

10:07:30 10 A. That's correct, yes.

11 Q. During the coup period Dr Manneh, Kukoi Samba Sanyang, was  
12 on the radio a lot, correct?

13 A. Yes.

14 Q. And he had declared a Marxist Leninist state in The Gambia.

10:07:49 15 Is that right?

16 A. I didn't listen to his broadcast, but if you say so then  
17 that's it.

18 Q. You didn't listen to the broadcast during the coup?

19 A. No, I didn't listen to the broadcast.

10:07:58 20 Q. Sir, did you hear or hear from other people that he was  
21 also threatening the hostages including the President's family?

22 A. Yes, at one time, yes, he said if the Senegalese didn't  
23 withdraw he would kill them. Yes, he said that.

24 Q. So you didn't believe in Marxist-Leninism. Is that right?

10:08:18 25 A. Yes, I don't believe in Marxist-Leninism.

26 Q. Did you believe in this kind of - would you call that  
27 terrorism, Mr Witness, when you threaten to kill someone's family  
28 and children?

29 A. I would not call it terrorism.

1 Q. You supported that action?

2 A. I didn't support that action.

3 Q. I'm a bit confused, Mr Witness. You still consider  
4 yourself a member of MOJA. Is that right?

10:08:50 5 A. Yes.

6 Q. What is it about MOJA that you - what part of its ideology  
7 attracts you?

8 A. The ideology of fighting for - I mean, social justice  
9 freedom for all.

10:09:04 10 Q. Can you explain exactly who you are fighting - who do you  
11 want to fight against?

12 A. Well, I will fight against anybody that's not promoting  
13 those ideologies.

14 Q. Is there any government that you saw as a model of the type  
10:09:16 15 of government you wanted to establish?

16 A. Excuse me, pardon me again?

17 Q. I'm sorry, let me try that. In MOJA or actually in your  
18 own view at that time when you were a member during the coup and  
19 before the coup, was there any government that existed that you  
10:09:34 20 saw as the type of government you wanted to install in The

21 Gambia?

22 A. I don't understand that question. It's confusing. I don't  
23 understand.

24 Q. Did you like, for example, the government that was  
10:09:45 25 established in Libya? Did you feel that that was a model to be  
26 used in The Gambia?

27 A. No, I would not like that type of government in The Gambia.

28 Q. Did your movement believe in, according to  
29 Marxist-Leninists ideas, that there would be a dictatorship for

1 the proletariat? That in other words there would be a leadership  
2 group deciding on issues rather than --

3 PRESIDING JUDGE: Please repeat that question slowly. None  
4 of it is on the record.

10:10:14 5 MR KOUMJIAN: Thank you.

6 Q. Mr Witness, did your movement believe in the  
7 Marxist-Leninist ideal of establishing a dictatorship of the  
8 proletariat?

9 A. Yes. Our movement MOJA believed in that, yes.

10:10:38 10 Q. And that would mean that for at least a period of time  
11 decisions would be made by a small group of those that were part  
12 of that political group for the benefit of the country. Is that  
13 correct?

14 A. Yes, that's correct, according to the ideology.

10:11:00 15 Q. You said you studied ideology in Libya, correct?

16 A. Yes.

17 Q. Can you explain that? What did you study?

18 A. When I say study, I didn't go to school, to university to  
19 study. I mean during my training we would take basic ideologies  
10:11:14 20 of the revolution.

21 Q. What were the nationalities of the trainers on ideology?

22 A. They were Libyans.

23 Q. And what was the ideological training that they gave? What  
24 did they teach?

10:11:27 25 A. They teach us how to be used to fighting for freedom for  
26 our people, social justice and equality.

27 Q. I understand that you are trying to summarise, but can you  
28 explain in more detail what ideology did they preach?

29 A. This is what I said, these are the ideologies they were

1 preachi ng.

2 Q. How do you establish social justice and equality according  
3 to the ideology the Gambians preached to you?

4 A. What? I don't know. Repeat your question again.

10:12:01 5 Q. How do you establish social justice and equality according  
6 to the ideology the Libyans taught you?

7 A. That is to establish a government that will be, I mean,  
8 answerable to the people, that will be placed - that will be  
9 answerable to the people, that will make best decisions for the  
10:12:21 10 people, that will take care of the people, you know, their social  
11 needs and there will be justice and equality.

12 Q. That ideology was anti-capitalist, correct?

13 A. Yes, if you may say so.

14 Q. And were they teaching you from the Green Book?

10:12:40 15 A. I read the Green Book but they were not teaching me from  
16 the Green Book.

17 Q. Were they teaching you in accordance with the ideals of the  
18 Green Book?

19 A. Sometimes some of the teachings would go with the  
10:12:54 20 ideologies of the Green Book, yes.

21 Q. Did any of the teachings go contrary to the ideology of the  
22 Green Book?

23 A. No, at the time, no.

24 Q. Did you discuss ideology with other nationalities who were  
10:13:10 25 present and training with you in Libya?

26 A. No.

27 Q. You didn't?

28 A. No.

29 Q. Did you ever discuss ideology with Charles Taylor?



1 A. No.

2 Q. Do you feel that you and Charles Taylor share the same  
3 ideology?

4 A. No.

10:13:30 5 Q. Perhaps my question could have caused confusion. Are you  
6 saying no, you --

7 A. Well, you ask the question so try to be specific.

8 Q. Thank you, sir. You are right. I take the blame. Do you  
9 and Charles Taylor share the same ideology according to your

10:13:47 10 understanding of his ideology?

11 A. No, we didn't share the same ideology.

12 Q. So, sir, you've told us you were always loyal to Charles  
13 Taylor but you had different political views; is that correct?

14 A. Yes.

10:13:59 15 Q. And what was your motivation to be loyal to Charles Taylor?

16 A. Because Charles Taylor, what the time - what he was doing,  
17 this is what motivated me.

18 Q. Was it? What Charles Taylor was doing motivated you?

19 A. Yes, because Charles Taylor was fighting for freedom for  
10:14:17 20 his people and that motivated me.

21 Q. Charles Taylor was fighting to establish what kind of  
22 government?

23 A. He was fighting to establish a democratic government.

24 Q. Well, how do you know that?

10:14:28 25 A. Yes, because he will always mention in his speeches.

26 Q. But you believe in a dictatorship of the proletariat?

27 A. Yes, that was, you know, the period of the revolution. But  
28 after the revolution succeed, you know, you could change.

29 Q. So did you feel that Charles Taylor was going to establish

1 a dictatorship of the proletariat for a period of time?

2 A. No, I never believed that he was going to do that.

3 Q. Now, in Libya, what other members of MOJA were present?

4 A. In Libya, as I said, we had a MOJA cell that comprised of  
10:15:14 5 mostly students from the Al Fateh University.

6 Q. Well, perhaps before we go to that we should continue with  
7 your biography a bit. When the coup happens, after it fails, you  
8 are arrested; is that correct?

9 A. That is correct.

10:15:28 10 Q. And approximately when are you released from detention?

11 A. I was released in late 1982. Yes, late 1982, yes.

12 Q. Where did you go after you were released?

13 A. I stayed in The Gambia briefly up to 1984.

14 Q. What did you do between being released and when you left  
10:15:55 15 The Gambia in 1984?

16 A. I worked for the Cooperative Union.

17 Q. What kind of work did you do?

18 A. I was a summary clerk at one of the produce buying  
19 stations.

10:16:07 20 Q. What was the Cooperative Union?

21 A. The Cooperative Union is a union that was responsible for  
22 the buying of produce on behalf of the government.

23 Q. Just so we record correctly what you said, because I'm not  
24 sure, did you say you were a summary clerk?

10:16:23 25 A. Yes, I was a summary clerk, yes.

26 Q. Why did you leave The Gambia?

27 A. I left The Gambia because one of my friends who and I was  
28 detained together was released and re-arrested.

29 Q. Now, sir, do you consider yourself still loyal, patriotic

1 to Gambia?

2 A. I'm a citizen of The Gambia.

3 Q. That wasn't my question. Thank you, but do you still  
4 consider yourself loyal and patriotic, being a citizen of Gambia,  
10:16:55 5 to that country?

6 A. Yes, I consider myself, yes.

7 Q. How long - when were you re-arrested?

8 A. I never said I was re-arrested. I said a friend of mine  
9 who and I was detained together was released and later  
10:17:13 10 re-arrested is what I said.

11 Q. Thank you.

12 A. The Courts can show that.

13 Q. You are correct. So that frightened you?

14 A. Yes. I was advised by my family to leave, and I left.

10:17:24 15 Q. Do you remember what month in 1984 you left, approximately?

16 A. Well, I can't remember, but it should be between, what? I  
17 don't know. I can't remember, actually. I can't remember.

18 Q. Where did you go when you left The Gambia?

19 A. When I left The Gambia, I went to a village in Senegal  
10:17:45 20 called Tambacounda.

21 Q. Thank you. And after going to Senegal, where did you go?

22 A. In Tambacounda I boarded a train to the capital of Mali,  
23 Bamako.

24 Q. For approximately how long were you in Senegal before you  
10:18:04 25 went to Mali?

26 A. No. That was just passing through.

27 Q. Thank you. When you got to Mali, how long did you stay in  
28 Mali?

29 A. Well, I stayed in Bamako maybe almost like a month or so.

1 Q. And were you in contact with anyone there?

2 A. The person I was lodging with was a Gambian who will reside  
3 in Mali.

4 Q. Was this another member of MOJA?

10:18:28 5 A. No, no, no, no, he was just a - he was just an ordinary  
6 person.

7 Q. And where did you go after you left Mali?

8 A. I left Bamako and I went to another town in Mali called  
9 Gao.

10:18:42 10 Q. Okay. And after you got to - how long did you stay in Gao?

11 A. Gao, it should be like a month or so.

12 Q. Sir, how do you spell?

13 A. G-A-O.

14 Q. What happened after the month in Gao?

10:18:59 15 A. From Gao, I went to a town in Algeria called Tamanrasset.

16 Q. How long did you stay in Tamanrasset?

17 A. Tamanrasset, maybe a month. A month or two. Something  
18 like that.

19 Q. And all of these are still - you're still in Mali, correct?

10:19:22 20 A. No. Tamanrasset is in Algeria.

21 Q. Algeria. Where did you go after you left Tamanrasset?

22 A. I went to another town - border town in Algeria called  
23 D'Janet.

24 Q. Can you spell that please?

10:19:35 25 A. I think the spelling is D-J-N-E-T, if I'm not mistaken.

26 Q. How long did you stay in D'Janet?

27 A. D'Janet, well, just passing through. We didn't stay long -  
28 I didn't stay long there, actually.

29 Q. Where did you go then, sir?

1 A. From there I entered Libyan border town called Barakat.

2 Q. Approximately when was it then that you entered Libya; do  
3 you recall?

4 A. Yes, I entered Libya in 19 - towards the end of 1994 -  
10:20:11 5 sorry, excuse me. 1984, sorry.

6 Q. Sir, when you left The Gambia, did you know then that the  
7 destination that you were intending to go to was Libya?

8 A. Yes, definitely.

9 Q. And why was it that you intended to go to Libya?

10:20:29 10 A. I intended to go to Libya because the people that myself  
11 participated in the coup then were in Libya, so I wanted to go to  
12 Libya to join them.

13 Q. Thank you. Who were you closest to among those that did  
14 the coup?

10:20:42 15 A. Who I am close to?

16 Q. Yeah. Who were you at that time closest to among those in  
17 the coup group?

18 A. I was close to everybody that - almost - almost - almost  
19 everybody.

10:20:54 20 Q. The leader of the coup, just so we're clear, was Dr Manneh,  
21 correct?

22 A. Yes.

23 Q. And what was his ethnic - what was his tribe?

24 A. Dr Manneh, I think he is a Jula by tribe.

10:21:08 25 Q. He established Supreme Council with 12 members, himself and  
26 11 others, correct?

27 A. Yes.

28 Q. And all 12 of them were Jula, correct?

29 A. I don't know whether they were all Julas.

1 Q. When did you - were you in contact with Baba Jobe before  
2 you left Gambia for Libya?

3 A. No, I was not in contact with Baba Jobe. In fact, at the  
4 time I didn't even know Baba Jobe.

10:21:38 5 Q. Baba Jobe was part of the coup, correct?

6 A. Baba Jobe was not part of the coup.

7 Q. Okay. Baba Jobe was a member of MOJA?

8 A. Yes, Baba Jobe was a member of MOJA.

9 Q. And he was the head of the cell that you were in in Libya?

10:21:54 10 A. That's quite correct.

11 Q. And this is a small world, Mr Witness. Baba Jobe later  
12 attained a high position in the government in Gambia, correct?

13 A. Yes.

14 Q. Charles Taylor and Baba Jobe know each other, correct?

10:22:06 15 A. Baba Jobe came to Liberia one time and he met with  
16 Mr Taylor. He came as a delegation. That was the only time I  
17 know they met.

18 Q. Where is Baba Jobe right now?

19 A. Baba Jobe, according to information, he is in prison.

10:22:19 20 Q. And he is in prison related to an airline company that he  
21 owned or was associated with; isn't that correct?

22 A. Not that what I heard. According to the news, what I heard  
23 was, he was responsible for an enterprise and he misappropriated  
24 some funds in that enterprise.

10:22:36 25 Q. The enterprise was Millennium Air an airline company; isn't  
26 that correct?

27 A. Well, I know it of to be the Youth Development Enterprise,  
28 YDE. That's the enterprise that I know he was heading.

29 Q. Do you know - have you heard of Millennium Air?

1 A. Millennium Air was - yeah, I heard of a Millennium Air in  
2 The Gambia, yes.

3 Q. Millennium Air bought airplanes from Victor Bout, correct?

4 A. I don't know that. I don't know who you call Victor Bout.

10:23:03 5 Q. Do you know Victor Bout, an arms dealer from the former  
6 Soviet Union?

7 A. I don't know him.

8 Q. When you got to Libya, where did you go?

9 A. When I got to Libya from Barakat, I went to a town called  
10:23:25 10 Murzuk.

11 Q. Can you spell that, please.

12 A. Murzuk, I think it's M-U-R-Z-U-K.

13 Q. How long did you stay there, sir?

14 A. Murzuk, I stayed there for some time because I did some  
10:23:40 15 work there.

16 Q. What kind of work did you do in Murzuk?

17 A. I seek employment with a construction company and I was a  
18 bricklayer, in fact.

19 Q. Just try to pause - to allow a short pause after I finish  
10:23:56 20 the question before you start to answer, please. How long were  
21 you working there in construction?

22 A. Yes, that's what I'm saying, it should be like six months  
23 or so, something like that.

24 Q. And then where did you go?

10:24:13 25 A. I went to Sebha.

26 Q. Can you spell that, please.

27 A. Sebha I think is S-A-B-H-A or S-E-B-H-A, something like  
28 that.

29 Q. Why did you leave Murzuk to go to Sebha?

1 A. Because Murzuk was not my destination.

2 Q. What was your destination?

3 A. My destination was to get to Tripoli.

4 Q. In order to do what?

10:24:44 5 A. In order to join my other colleagues.

6 Q. And what was the ultimate objective in going to Tripoli and  
7 joining your colleagues?

8 A. Yes, my colleagues were there. If I had gotten there, I  
9 would know whatever they were engaged and I would be engaged in

10:24:53 10 the same thing. So that's why I wanted to --

11 PRESIDING JUDGE: Please slow down. Please slow down.

12 MR KOUMJIAN:

13 Q. Did you say, Mr Witness, that your colleagues were there  
14 and you wanted to go there to become involved in whatever they  
10:25:13 15 were doing?

16 A. Yes.

17 Q. You didn't know what they were doing there?

18 A. I knew what they were doing.

19 Q. You did know?

10:25:20 20 A. Yes, I did know.

21 Q. What were they doing?

22 A. They were dry training.

23 Q. You knew that they were training for what?

24 A. They were training. They were training as revolutionaries.

10:25:37 25 Q. You knew that before you left The Gambia; is that correct?

26 A. Yes, I knew.

27 Q. And when you say you knew that they were training as  
28 revolutionaries, did you know what their purpose was, what they  
29 were going to do once they had received the training?



1 A. Yes. They were preparing again to come and make another  
2 attempt.

3 Q. In other words, to overthrow the government in The Gambia?

4 A. That's quite correct.

10:26:07 5 Q. And to install a Marxist-Leninist government in The Gambia  
6 as far as you understood?

7 A. Whatever you may call it. I don't know.

8 Q. Well, you wanted to join them; is that right?

9 A. Yes.

10:26:15 10 Q. Why?

11 A. Because I was part of the previous coup and I still want to  
12 make sure that, you know, there was a change of government -  
13 there's a change of government.

14 Q. How many members of MOJA were in that cell in Libya at that  
10:26:33 15 time when you arrived?

16 A. Well, I can't be precise. We were not too many. I can't  
17 be precise on the number.

18 Q. Well, can you give us an approximation?

19 A. I can't be precise. Let me say I can't be precise. I  
10:26:48 20 don't want to be seen as misleading.

21 Q. Okay. Now, were all of the members of the MOJA group in  
22 training in Libyan camps?

23 A. No.

24 Q. Okay. What percentage of them were training in Libyan  
10:27:02 25 camps?

26 A. There were very - maybe about - the ones I know was about  
27 like three or four.

28 Q. Only three or four individuals were training?

29 A. Yeah.

1 Q. What were the others doing?

2 A. The others were students at the university.

3 Q. Was it your understanding that everyone wanted to be  
4 training but all of them had not yet been accepted?

10:27:19 5 A. There were three in training, including myself. The rest  
6 were students at the university of - I mean, the Al Fateh  
7 University.

8 Q. Did Baba Jobe himself train in the Libyan camps?

9 A. I don't know. I don't know whether he trained there.

10:27:38 10 Q. And that was the Al Fateh - F-A-T-A-H - University; is that  
11 correct?

12 A. That's correct.

13 Q. What happened once you got to Tripoli? Well, first of all,  
14 when was it, to the best of your recollection, when you got to

10:28:07 15 Tripoli?

16 A. I got to Tripoli in 1986.

17 Q. Do you remember the month?

18 A. No, I can't remember precisely the month.

19 Q. Mr Witness, were you in Libya when the Americans bombed  
10:28:24 20 Tripoli?

21 A. Yes, I was there.

22 Q. What were you doing at that time?

23 A. At the time we had just completed - at the time we were  
24 still undergoing training, yes.

10:28:35 25 Q. Where were you? Which camp were you in?

26 A. I was at Camp 2nd March.

27 Q. Do you remember when that was?

28 A. I can't remember. I can't be precise.

29 MR KOUMJIAN: In the package - we have some Prosecution

1 documents that could be distributed now:

2 Q. Did the bombing affect the camp that you were at, sir?

3 A. No, the bombing didn't affect the camp I was at.

4 Q. How did you first hear about the bombing?

10:29:28 5 A. I heard about the bombing, the sound. I heard the sound.

6 PRESIDING JUDGE: Mr Koumjian, if I may inquire, is this a  
7 bundle of new documents?

8 MR KOUMJIAN: Yes.

9 PRESIDING JUDGE: Fresh evidence?

10:29:40 10 MR KOUMJIAN: Yes. Well, not every one, I believe. Well,  
11 I believe they all are.

12 PRESIDING JUDGE: Are they or are they not new documents?

13 MR KOUMJIAN: They are new documents in the sense that they  
14 are not admitted or marked for identification in this trial.

10:30:14 15 Yes, that's correct, they all are new.

16 MR ANYAH: Madam President, I rise to make one request of  
17 the Chamber. Could we be allowed some time to look at these in  
18 court before any document is shown to the witness in the first  
19 instance?

10:30:30 20 MR KOUMJIAN: Your Honour, I have no problem with that and  
21 I can come back after the break certainly before I touch any  
22 documents.

23 PRESIDING JUDGE: Then in that regard you can only refer to  
24 the documents after the break.

10:30:42 25 MR KOUMJIAN: Yes, that's fine:

26 Q. Sir, when you got to Tripoli did you do anything before you  
27 went into training?

28 A. When I got to Tripoli whether I did anything before I went  
29 to training?

1 Q. Yes, were you doing any employment?

2 A. No, I was not employed.

3 Q. How long were you in Tripoli before you went into training?

4 A. I was in Tripoli, it didn't take long before I went into  
10:31:13 5 training.

6 Q. Can you give us an approximation?

7 A. It was not even quite - I don't think it was quite even a  
8 month. I think quite - maybe up to a month before I went to  
9 training.

10:31:24 10 Q. How was it arranged for you to go to training?

11 A. Because I was in contact with most of the - with other  
12 members of MOJA and the place I was, they came there. We met the  
13 people at the Mataba, it was arranged for me to go to the camp  
14 and I went there.

10:31:41 15 Q. Well, did you go to the Mataba before to meet someone  
16 before you went into training?

17 A. There was a sub-office of Mataba that I went to with the  
18 other members of MOJA to meet this officer before I went there.

19 Q. So you went to the sub-office and you were introduced to  
10:31:59 20 the officer as a member of MOJA?

21 A. Excuse me?

22 Q. Is it correct you went to the sub-office and you were  
23 introduced to the Libyan official in the sub-office as a member  
24 of MOJA?

10:32:10 25 A. Yes, that's correct.

26 Q. And then he arranged for you to undergo the training?

27 A. That's correct.

28 Q. Did you enter the training by yourself at that time? Did  
29 anyone come in the same day as you?

1 A. I went to the training. Other two persons were there but  
2 they later on left.

3 Q. The other two were Gambians?

4 A. Yes, they were.

10:32:37 5 Q. Were they also members of MOJA?

6 A. Yes, they were.

7 Q. Why did they leave the training?

8 A. I don't know why.

9 Q. What were their names?

10:32:44 10 A. I know of one I think Barra Jange and one Bai Jallow.

11 PRESIDING JUDGE: Mr Witness, do you suppose you can spell  
12 those names.

13 THE WITNESS: B-A-R-R-A and J-A-G-N-E, and B-A-I  
14 J-A-L-L-O-W.

10:33:37 15 MR KOUMJIAN:

16 Q. When you got to 2nd March Camp what was your first training  
17 that you underwent?

18 A. I underwent basic military training, infantry training.

19 Q. How long did that last for?

10:33:54 20 A. I think it last for like six months.

21 Q. You talked before in your direct examination about other  
22 nationalities who were present. Can you repeat the other groups'  
23 nationalities, and if you know the group that they belonged to,  
24 that were present training in the camps in Libya with you? I'm  
10:34:16 25 talking about all of the camps?

26 A. No, why can't you take it one-by-one?

27 Q. Okay, fine, let's take it one-by-one. 2 March Camp?

28 A. There were Tuaregs there, there were Congol ese.

29 Q. The Tuaregs were from which country?

1 A. I don't know which country they are from. But there were  
2 Congolese, people from the Congo. And there were people from  
3 Latin America.

4 Q. Were they Colombians?

10:34:45 5 A. I don't know, but they were from Latin America.

6 Q. They were from the Forcas Armadas Revolucionarias de  
7 Colombia, is that correct?

8 A. I don't know. They were from Latin America. I don't know  
9 which part of Latin America they are from.

10:35:01 10 Q. Sir, we can't both talk at the same time, so please wait  
11 for my question to be finished. Let me repeat the question.  
12 They were from the Revolutionary Armed Forces of Colombia,  
13 correct, the FARC?

14 A. I don't know where they are from.

10:35:18 15 Q. Were there Irish training in the camps, any of the camps?

16 A. I don't know about any Irish.

17 Q. Did you meet anyone from the IRA in Libya?

18 A. No.

19 Q. I interrupted you. After the South Americans - you said  
10:35:35 20 the Congolese, South Americans, what other nationalities were in  
21 the camps or groups in the 2 March Camp?

22 A. This what I said. I said you weren't listening to me. I  
23 said there were Tuaregs, there were a group from the Congo and  
24 there was a group from Latin America and this is what I said.

10:35:54 25 Q. These are the only nationalities you know?

26 A. Yes.

27 Q. From the 2 March Camp?

28 A. Yes, this is what I can remember.

29 Q. What is the next camp you went to?

1 A. I went to Tajura.

2 Q. How long were you in the 2 March Camp?

3 A. I was there I can't remember for how long but even after  
4 the training I stayed there, we still go in and out.

10:36:16 5 Q. How long did the training last for?

6 A. The training lasts for six months.

7 Q. Were you in training at 2nd March or were you going in and  
8 out at the time of the American bombing of Tripoli?

9 A. At the time of the American bombing we were still under  
10:36:37 10 training. I was still under training.

11 Q. About how long had you been in training when the bombing  
12 occurred? Do you remember? Was it the beginning of your  
13 training or the end?

14 A. I can't remember actually.

10:36:50 15 Q. The Liberians had not yet arrived when you were at the 2nd  
16 March Camp?

17 A. At the time I didn't know of any Liberians.

18 Q. Now, after the training you said you were going in and out.  
19 What does that mean?

10:37:07 20 A. After the training?

21 Q. Yes.

22 A. Yes, sometimes I will go into town, sometimes I will come  
23 back to the camp.

24 Q. Were you staying in some kind of barracks at the camp?

10:37:18 25 A. The camp, yes - we're staying in - the places we're staying  
26 in were like containers but they were designed as living  
27 quarters.

28 Q. I mean after you completed the training were you still  
29 staying in these barracks?

1 A. When I'm there we stay at the same place we were during the  
2 training.

3 Q. But you were no longer undergoing training because you had  
4 completed it. Is that correct?

10:37:42 5 A. Yes, but we were still part of the camp.

6 Q. How did you remain in that status of having finished  
7 training but still being at the 2nd March Camp?

8 A. Up to the time I went to Tajura in 1997.

9 Q. About how many months was that, or years?

10:37:56 10 A. I don't know. I can't be precise. I don't know.

11 Q. Do you remember what month you went to Tajura Camp?

12 A. I can't remember which month.

13 Q. What's the difference between the 2nd March Camp and Tajura  
14 Camp?

10:38:09 15 A. They were all military camps, except maybe at Tajura we did  
16 more intensive training than in 2nd March.

17 Q. It's the same branch of the Libyan armed forces that's  
18 doing the training?

19 A. You are quite correct.

10:38:23 20 Q. Were there trainers from other nationalities?

21 A. The trainers were Libyans.

22 Q. So when you got to the Tajura Camp what nationalities were  
23 present there?

10:38:42 24 A. When I got the Tajura Camp first there were the - the  
25 Tuaregs were there also and the Sumatrans.

26 Q. The Sumatrans?

27 A. Yes.

28 Q. And any other nationalities that you recall?

29 A. And later on there was the Liberians and the Sierra



1 Leoneans.

2 Q. Approximately how many months after you arrived at Tajura  
3 did the first Liberians arrive?

4 A. I don't know. I don't know, but it didn't take too long.

10:39:09 5 Q. So it was sometime in 1997 that the Liberians arrived?

6 A. That's correct.

7 Q. They weren't there previously?

8 A. Pardon me?

9 Q. They were not there previously?

10:39:22 10 A. No.

11 Q. What was the training at Tajura? What did it consist of?

12 A. The training at Tajura was the Special Forces training.

13 Normal military training, training in weapons in different

14 fields, in artillery and navy, mines, explosives.

10:39:55 15 Q. What kind of training did you receive in explosives?

16 A. Are you suggesting that I said that I trained in  
17 explosives? I never said that.

18 Q. I understood you to say - let me read back the answer that

19 I understood you to give just prior to that question:

10:40:13 20 "Q. What was the training at Tajura? What did it consist  
21 of?

22 A. The Special Forces training. Normal military training,  
23 training in weapons in different fields, in artillery and  
24 navy, mines, explosives."

10:40:28 25 A. Are you referring to me as an individual?

26 Q. Yes.

27 A. No, I didn't do mines. I told you I was referring to the  
28 general training.

29 Q. So mines and explosives were topics that other people were

1 trained in but not you?

2 A. Yes.

3 Q. Do you know how - what they were trained about explosives,  
4 what was the subject of the explosive training?

10:40:47 5 A. It was not my field. I don't know.

6 Q. How many Gambians were with you first at the 2nd March  
7 Camp?

8 A. At the 2nd March Camp we are like - I don't know - I think  
9 talking about seven. Seven. Seven to eight.

10:41:18 10 Q. Okay. Thank you. And how about at Tajura? How many  
11 Gambians were there?

12 A. I don't know the number exactly, but it was more at the  
13 time. The number is maybe what? I will think about it later on.  
14 I'll think about it.

10:41:36 15 Q. More than there were at the 2nd March Camp?

16 A. Yes, definitely, yes.

17 Q. But the Liberians that arrived far outnumbered your group;  
18 is that correct?

19 A. Yes, that's correct.

10:41:45 20 Q. Can you estimate how many Liberians there were?

21 A. No, I can't. I don't know how many there were.

22 Q. It was more than 100?

23 A. I don't know how many there were.

24 Q. And Sierra Leoneans arrived; is that correct?

10:42:04 25 A. Yes.

26 Q. Who arrived first, the Liberians or the Sierra Leoneans?

27 A. I can't really remember who arrived first.

28 Q. How many Sierra Leoneans were there?

29 A. I don't know their number.

1 Q. Were there more Sierra Leoneans than Gambians, or were  
2 Gambians in the majority compared to Sierra Leoneans?

3 A. I don't know the number of Sierra Leoneans.

4 Q. So you don't know whether they were equal in number to the  
10:42:33 5 Gambians?

6 A. Yes, I don't know.

7 Q. Is it correct that you know that they were far fewer than  
8 the Liberians?

9 A. I don't know their number. But yes, there are fewer than  
10:42:43 10 Liberians.

11 Q. They were less than half the number of Liberians, correct?

12 A. I don't know.

13 Q. After the - how long were you training in Tajura?

14 A. I was in Tajura up to 19 - I think '88, I think, yeah.  
10:43:09 15 1988, '89, yeah.

16 Q. So it was over - it was a year or two that you trained in  
17 Tajura?

18 A. Yes, approximately, yes.

19 Q. And all this time you're undergoing training?

10:43:19 20 A. Yes, we were there. Not all the time. Sometimes you have  
21 a break, but you remain there.

22 Q. Where was it that you received the ideological training?

23 A. These are part of the training. Sometimes you go to  
24 classes and the people will tell you - the people will teach you,  
10:43:33 25 during the revolution, how you are supposed to, you know, when  
26 you are fighting, how you are supposed to - I mean, when you come  
27 across civilians, how you are supposed to treat them, how you are  
28 supposed to take care of them. Like even, how do you call it,  
29 sometimes they teach some things about, you know, the function of

1 Red Cross and all.

2 Q. Actually, my question was just in which camp did you  
3 receive the ideological training?

4 A. In Tajura.

10:44:04 5 Q. After Tajura, where did you go?

6 A. After Tajura, I remained in Libya.

7 Q. You didn't undergo any further training in Libya after  
8 Tajura?

9 A. No, I didn't undergo any further training in Libya.

10:44:20 10 Q. Now, in addition to the 2nd March Camp and Tajura Camp,  
11 you're aware there were other camps where training was going on  
12 in Libya, correct?

13 A. I'm not aware of any other camp that training was going on.  
14 I'm not aware of that.

10:44:42 15 Q. Wasn't there a camp in a city, Benghazi? Does that ring a  
16 bell, sir?

17 A. Benghazi is, I think, the second capital in Libya. But as  
18 far as I'm concerned, there was never training in Benghazi.  
19 There was no training in Benghazi.

10:45:03 20 Q. There was advanced training in Benghazi, wasn't there?

21 A. Excuse me?

22 Q. There was advanced military training going on there,  
23 correct?

24 A. I don't know about it. I never went there.

10:45:15 25 Q. So you don't know whether there was or not? The answer is  
26 you don't know?

27 A. Yes, I don't know.

28 Q. Now, after you finished the training in Tajura, where did  
29 you go?

1 A. I remained in Tripoli. I sought employment. I was doing  
2 some small work, even though I was given subsistence by the  
3 Libyans, but I decided to do something for myself.

4 Q. What did you do for yourself?

10:45:44 5 A. I was engaged in the same construction business.

6 Q. How long were you living in Libya working construction?

7 A. Up to the time I left in November 1989.

8 Q. Can you tell us when it was in 1989 that you left - in  
9 November, I'm sorry. Excuse me, I missed that. Mr Witness, what

10:46:13 10 was it - how did you first become aware - let me withdraw that  
11 question. Why did you leave Libya?

12 A. I left Libya to go to Burkina Faso to join my fellows.

13 Q. Who was it that told you to go to Burkina Faso, if anyone?

14 A. Dr Manneh told me to go there.

10:46:36 15 Q. When had you seen Dr Manneh - or had you seen him when you  
16 were in Libya?

17 A. When I had seen him?

18 Q. Yes.

19 A. I had seen Dr Manneh many times.

10:46:46 20 Q. Okay. Where?

21 A. In Libya.

22 Q. Where in Libya?

23 A. At the Mataba. At Camp 2nd March. At his residence.

24 Q. Okay. Thank you. Now, Charles Taylor, did you see him in  
10:47:02 25 Libya?

26 A. Yes, I saw Charles Taylor in Libya, yes.

27 Q. How many times did you see Charles Taylor in Libya?

28 A. If I'm not mistaken, I think once or twice.

29 Q. Where did you see him on this one or two occasions, if you

1 recall?

2 A. Every time I saw him was at the Mataba.

3 Q. Did you ever speak to Charles Taylor?

4 A. Yes, I would speak to him. Yes, I spoke to him.

10:47:29 5 Q. Was he friendly to you?

6 A. No, we were not friendly because he and myself were not at  
7 the same level, so we are not friend.

8 Q. My question was: Was he friendly to you?

9 A. Whether he is a friendly person?

10:47:42 10 Q. Was he friendly to you when you met him in Libya?

11 A. Yes. We shook friendly - yeah, we made friendly exchanges,  
12 yes. "How are you?" "Fine," I would say.

13 Q. Did you ever talk to him, aside from just a greeting?

14 A. No.

10:47:55 15 Q. So the only times - how long was Charles Taylor within your  
16 sight in Libya in total?

17 A. No, not too long. All the time I met him, he didn't stay  
18 there long. Just for a short visit and he will go back.

19 Q. Well, how do you know he was coming and going?

10:48:19 20 A. I'm not saying he was coming and going. I said at the time  
21 I saw him he didn't stay long there. That's what I said.

22 Q. Who was he with when you saw him, if you remember?

23 A. I don't know who he was with.

24 Q. Now, you said that your leader, Dr Manneh, knew Charles  
10:48:37 25 Taylor, correct?

26 A. Yes.

27 Q. Did they know each other in Libya?

28 A. Yes.

29 Q. How do you know that?

1 A. Yes, because they attend Mataba conferences together, so  
2 normally all leaders that attend conference together all over the  
3 world, you know, other leaders, they know each other.

4 Q. Well, did you ever see them together?

10:48:54 5 A. To see them together, in like - in which form are you  
6 referring to?

7 Q. In Libya did you ever see Dr Manneh and Charles Taylor  
8 together?

9 A. I saw them in one another's company at the conference.

10:49:08 10 Q. So when I asked you before who Charles Taylor was with and  
11 you said you don't know who he was with; is that correct, you  
12 didn't know who Charles Taylor was with?

13 A. When you said who was - the person he came with? I don't  
14 know because you said "with". I don't know what you are  
10:49:27 15 referring to when you say "with".

16 Q. Okay. Fair enough. Did you see him talking to Dr Manneh?

17 A. He and Dr Manneh would exchange, you know, greetings and  
18 they would talk. I don't know what they would talk, but they  
19 would talk.

10:49:42 20 Q. You never were in any meeting between Dr Manneh and Charles  
21 Taylor, correct?

22 A. No, I was never in any meeting between Dr Manneh and  
23 Charles Taylor.

24 Q. Because you were not at the level to attend such a meeting,  
10:49:52 25 is that your understanding?

26 A. I never attended any meeting between Charles Taylor and  
27 Dr Manneh.

28 Q. Now, you met Foday Sankoh in Libya, correct?

29 A. I saw Foday Sankoh. There's a difference when you meet

1 somebody and when you see somebody. So I saw him in Libya.

2 Q. Did you talk to him?

3 A. No, I don't talk to him. We can exchange greetings, that's  
4 all.

10:50:14 5 Q. Did you know him by name?

6 A. Yeah, I knew his name to be Foday Sankoh, yes.

7 Q. In the camps there were nationalities like south Americans.  
8 Do you speak Spanish?

9 A. I don't speak Spanish.

10:50:27 10 Q. There were Sumatrans. Do you speak any of the Indonesian  
11 languages?

12 A. No, I don't speak --

13 Q. Were you able - what people were you most easily able to  
14 communicate with among the groups that trained in Libya?

10:50:41 15 A. Mostly the Liberians and my group.

16 Q. And how about the Sierra Leoneans?

17 A. The Sierra Leoneans? The only person I know among them was  
18 Foday Sankoh and their leader Ali Kabbah.

19 Q. When did you see Ali Kabbah?

10:50:56 20 A. The last time I saw Ali Kabbah was 1997, when he left  
21 Tripoli.

22 Q. You mean 1987?

23 A. Oh, sorry, 1987. Sorry.

24 Q. It's okay. Did you see him when he was leaving at the  
10:51:08 25 airport?

26 A. No.

27 Q. Where did you see Ali Kabbah in Libya?

28 A. Where I saw Ali Kabbah in Libya?

29 Q. Where, sir.



1 A. I saw him at the Mataba.

2 Q. And you told us that you understood that he had been given  
3 money by the Libyans, correct?

4 A. Yes.

10:51:18 5 Q. And that he took the money and never - it was supposed to  
6 be for recruiting more people to come for training from Sierra  
7 Leone, correct?

8 A. I don't know from where. I didn't say from Sierra Leone.  
9 I never said Sierra Leone.

10:51:32 10 Q. He took the money - it was supposed to be money for  
11 recruiting people to come to train in Libya, correct?

12 A. Yeah, and he left. He never came back.

13 Q. And that was in 1987, correct?

14 A. Correct.

10:51:46 15 Q. Now, how long after he left did you remain in Libya?

16 A. I remained in Libya up to November 1989.

17 Q. So you were there more than two years after he left,  
18 correct?

19 A. That should be correct yes.

10:51:55 20 Q. And how long were the Sierra Leoneans, any of them that you  
21 saw, present in Libya after 1987?

22 A. I don't know how long they stayed there.

23 Q. Were they there when you left?

24 A. I left them at the camp, yes.

10:52:08 25 PRESIDING JUDGE: Please slow down again.

26 MR. KOUMJIAN:

27 Q. Now, sir, you have by now a lot of military experience,  
28 correct?

29 A. Yes, I assume so.

1 Q. The purpose the Libyans were training these groups, can you  
2 tell us what you understood was the motivation for the Libyans in  
3 training these various groups?

10:52:29 4 A. These groups asked for training and the Libyans provided  
5 them training.

6 Q. Well, would any group anywhere in the world that asked for  
7 training would get training?

8 A. Well, I don't know whether any group that asked for  
9 training will get training, but these groups - the Libyans didn't  
10:52:42 10 tell them, "Yo, come. Let's train." They went and asked the  
11 Libyans to train them and they trained them.

12 Q. Did you understand that these groups were training to  
13 become effective military revolutionary groups?

14 A. Yes, they were, yes.

10:52:55 15 Q. That was the purpose of the training, correct?

16 A. That's correct yes.

17 Q. Now, sir, in your experience you were in the military for  
18 how many years?

19 A. I can't remember for how long, anyway.

10:53:04 20 Q. Okay. Well, we can add it up later. But, sir, in your  
21 experience, can a military group be effective without a leader?

22 A. Can a military group be effective without a leader?

23 Q. Yes.

24 A. They cannot be very effective.

10:53:19 25 Q. Who replaced Ali Kabbah?

26 A. Nobody as I know of.

27 Q. Sir, would that make - that you know of?

28 A. I don't know anybody that replaced him.

29 Q. That's fair enough. Would it be fair to say you don't know

1 who replaced him?

2 A. Yes, I don't know who replaced him.

3 Q. Would it be fair to say, sir, that based on your experience  
4 you would expect that the Sierra Leoneans would have had a  
10:53:46 5 commander after Ali Kabbah left, correct?

6 A. I don't know whether they have a commander after Ali Kabbah  
7 left.

8 Q. That's not the question. Did all the groups that you knew  
9 of in Libya have commanders or leaders?

10:53:58 10 A. I know my group had a commander, had a leader. I know the  
11 RUF to have a leader. I know the Liberian group to have a  
12 leader.

13 Q. Would a revolutionary group be effective without having a  
14 military leader?

10:54:13 15 A. I don't know. They might be. They may be; they may be  
16 not.

17 Q. Sir, would it be correct to say that the Liberians were a  
18 much larger and stronger group than the Sierra Leoneans and  
19 Gambians combined?

10:54:36 20 A. I don't know. I don't know what you are referring to  
21 stronger group, but they are a larger group. They are a larger  
22 group.

23 Q. Would you agree that in number the Liberians were greater  
24 in number than the Gambians and Sierra Leoneans combined?

10:54:46 25 A. That's correct.

26 Q. In the camp, which group did the Sierra Leoneans spend the  
27 most time with?

28 A. I don't know.

29 Q. Did you ever attend any meetings between Dr Manneh and any

1 foreigners - any non-Gambians?

2 A. No, I never attended any meetings with Dr Manneh and any  
3 non-Gambian.

4 Q. Now, sir, in November 1989, when you got to - when you went  
10:55:24 5 to Burkina Faso, did you go alone or with others?

6 A. I went alone. I was the last in the group that left in  
7 November.

8 Q. In what kind of transport did you have? Did you take a  
9 commercial flight, or how did you go?

10:55:37 10 A. Yes, I took a commercial flight to go to Burkina Faso.

11 Q. When you arrived in Burkina Faso, where did you go?

12 A. I went straight to where my fellow Gambians were.

13 Q. Where was that, sir?

14 A. Some - in Ouagadougou.

10:55:52 15 Q. This was a compound that they were staying at?

16 A. Yes, it was a compound.

17 Q. About how many Gambians were in Ouagadougou?

18 A. At the time, maybe I have to, you know - almost all the  
19 guys - all the ones that trained in Tajura with me left and they  
10:56:07 20 were in Burkina.

21 Q. Did you see other nationalities that you had seen in Libya  
22 or other persons that you had trained with or known from Libya in  
23 Burkina Faso?

24 A. No, I never saw any other nationality there.

10:56:24 25 Q. Did you see Liberians?

26 A. Liberians were not there when I got there.

27 Q. During the time you were in Burkina Faso, before going to  
28 Liberia, what nationalities did you see in Burkina Faso?

29 A. I only saw the citizens, Burkinabes, and my brothers, the

1 Gambians.

2 PRESIDING JUDGE: You are asked to slow down again.

3 THE WITNESS: Thank you, your Honour.

4 PRESIDING JUDGE: Both of you.

10:56:42 5 MR KOUMJIAN: Thank you:

6 Q. Sir, did you see Liberians in Burkina Faso?

7 A. When I got to Burkina Faso in 1989, I never saw any  
8 Liberians. Liberians were not there at the time.

9 Q. When was the first time you saw Liberians after you arrived  
10:56:59 10 in November 1989 in Burkina Faso?

11 A. When I went into Liberia in 1990.

12 Q. Sir, didn't you - you talked to us about a house that  
13 Charles Taylor had in Ouagadougou, correct?

14 A. Yes.

10:57:15 15 Q. Did you see Charles Taylor in Ouagadougou?

16 A. Yes, I saw Charles Taylor in Ouagadougou.

17 Q. When did you see him there?

18 A. I saw him in - when I arrived in 1989.

19 Q. So there were Liberians when you arrived in 1989 in  
10:57:31 20 Ouagadougou, correct?

21 A. Well, you didn't specify, so I will specify. If you say  
22 Charles Taylor and I say Liberians, because I refer to Liberians  
23 as those that trained with me in the camp. Charles Taylor, even  
24 though he is a Liberian, but you are referring to him as an  
10:57:46 25 individual here.

26 Q. Sir, was Charles Taylor alone, or you don't know whether he  
27 was alone or not? Do you know whether or not Charles Taylor was  
28 alone in Ouagadougou?

29 A. Charles Taylor was in Ouagadougou. I know he was in

1 Ouagadougou.

2 Q. And you don't know whether he was with anybody else; is  
3 that correct?

4 A. I didn't see any other person - any other Liberian there.

10:58:06 5 Q. Sir, we can't both be speaking at the same time. Wait  
6 until I finish the question and pause a second or two before you  
7 begin your answer.

8 A. Sir, but always let me know that, you know. If you finish,  
9 just ask me to answer the question, because sometimes when I can  
10:58:19 10 assume that you finish, this way I can answer. I didn't mean to  
11 interrupt you. I'm sorry if I do that.

12 Q. That's why it helps if you just - and I'll try to slow down  
13 also - if you wait for a second or two after I finish the  
14 question before you begin your answer to make sure I'm finished.

10:58:33 15 A. Thank you, counsel.

16 Q. In Ouagadougou, who was supporting you?

17 A. My leader, Dr Manneh, was supporting me with the help of  
18 the Burkina government.

19 Q. How much money were you receiving in Ouagadougou?

10:58:52 20 A. I was not receiving any money.

21 Q. In fact, in Ouagadougou financially things were not very  
22 good, correct, for you and the other Gambians?

23 A. That is correct, yes.

24 Q. And you were sitting in Ouagadougou without a plan at that  
10:59:07 25 time to get into The Gambia, correct?

26 A. You can't say without a plan. I can't agree that we don't  
27 have a plan. We had plan.

28 Q. Did you have plans to - when were you planning to go to  
29 Gambia?

1 A. I can't tell you when our plan is. I don't know our  
2 planning, but I can't say we don't have a plan. Somebody without  
3 a plan is a useless persons, so we had a plan.

4 Q. What was the plan?

10:59:29 5 PRESIDING JUDGE: We have to pick it up again from after  
6 the break. We will reconvene at 11.30.

7 [Break taken at 11.00 a.m.]

8 [Upon resuming at 11.32 a.m.]

9 MR GRIFFITHS: Madam President, can I seek some  
11:32:36 10 clarification for the assistance of Mr Taylor and those  
11 responsible for transporting him to Court as to the sitting times  
12 next week. Because he was of the view that we're not sitting on  
13 Monday. But we are sitting a full day on Monday, aren't we?  
14 We're sitting a full day Monday, I think, Tuesday; Wednesday and  
11:33:07 15 Thursday we're sitting 9.30 to 1.30, but we're not sitting on  
16 Friday.

17 PRESIDING JUDGE: That is correct. That is according to  
18 the amended schedule, and I really apologise because the schedule  
19 keeps changing and this is due to factors beyond our control.

11:33:26 20 MR GRIFFITHS: Now that that's clear - thank you very much.

21 PRESIDING JUDGE: I might as well inform the parties that  
22 the week following that has also changed its sitting schedules.  
23 There is a new sitting schedule for the week following - I think  
24 beginning 8 March.

11:33:50 25 MR GRIFFITHS: I don't think that has been indicated to us  
26 as yet, Madam President.

27 PRESIDING JUDGE: I'm sure it will be. There is something  
28 that I saw on the email, and I think the email was addressed to  
29 everybody, but it came in this morning.

1 MR GRIFFITHS: This morning?

2 PRESIDING JUDGE: Yes.

3 MR GRIFFITHS: Okay, I'll check.

4 PRESIDING JUDGE: Mr Koumjian, please continue.

11:34:26 5 MR KOUMJIAN: Thank you:

6 Q. Mr Witness, just to remind you and myself, let's both go  
7 slowly and pause between the questions and the answers.

8 A. Thank you, counsel.

9 Q. Sir, before we go back to where you were in Burkina Faso,  
11:34:40 10 let's just try to quickly complete some biographical information  
11 about you. You said you went to Liberia in about April of 1990.  
12 Correct?

13 A. About March, April 1990, yes.

14 Q. March, April, thank you. Now, when you went to Liberia,  
11:34:59 15 can you list slowly each position or assignment that you had once  
16 you arrived in Liberia in March or April 1990. Let's just take  
17 our time and go through those. When you arrived in Liberia, what  
18 position did you hold?

19 A. I was a bodyguard to Mr Taylor.

11:35:20 20 Q. How long were you a bodyguard for Mr Taylor?

21 A. I remained bodyguard to Mr Taylor throughout, up to the  
22 time I was assigned outside.

23 Q. Until you left for Libya?

24 A. No, I can't say until I left for Libya.

11:35:37 25 Q. Okay, please explain.

26 A. I said I was bodyguard to Mr Taylor until the time I left  
27 to go on another assignment in 1993.

28 Q. Okay. During the time from March, April 1990 until this  
29 new assignment in 1993 - and can you repeat for us what was the



1 new assignment in 1993?

2 A. I said I was assigned at the southeastern region to provide  
3 security for timber companies that were there.

4 Q. During the years from your arrival in Liberia until your  
11:36:14 5 assignment as security for the timber company, did you have any  
6 other assignment besides being a bodyguard for President Taylor?

7 A. Yes.

8 Q. What were those assignments or assignment?

9 A. I was assigned as his radio operator.

11:36:31 10 Q. As Charles Taylor's radio operator?

11 A. Correct.

12 Q. And how long were you assigned as Charles Taylor's radio  
13 operator?

14 A. I remained in that position until I left to go on that  
11:36:45 15 assignment in the southeast.

16 Q. When did you begin your assignment as a radio operator?

17 A. I began my assignment as radio operator in 1990.

18 Q. In what month, if you know?

19 A. I can't remember the month. I can't recall the month.

11:36:59 20 Q. How long after you arrived in Liberia do you think it was?

21 A. Well, I can't recall. I can't recall.

22 Q. Where were you when you received this assignment? In which  
23 part of Liberia?

24 A. At Gborplay.

11:37:19 25 Q. Now, the assignment providing security for the timber  
26 company, you were still working for Mr Taylor, correct?

27 A. That's correct.

28 Q. Did you consider yourself NPFL at that time?

29 A. Definitely, yes.

1 Q. And what was the name of the company?

2 A. The company Was TTCO. I don't know what it - actually, I  
3 think it's Togba Timber Company. TTCO.

4 Q. And describe a little bit what that company did. What was  
11:37:51 5 its business?

6 A. It was a timber company.

7 Q. When you say a timber company, what did it do?

8 A. It do logging --

9 Q. Sir, I just want to remind you you're starting before I  
11:38:00 10 finish the question, so just slow down again. Please explain.

11 A. When I say a timber company, this is a company that do  
12 logging, they cut timbers, they have a sawmill and some of the  
13 timber they export.

14 Q. And other Gambians were assigned to other timber companies  
11:38:21 15 as security at various times, correct?

16 A. At various times, yes.

17 Q. Can you give us what other Gambian assignments that you  
18 know of who were assigned - other Gambians who were assigned for  
19 security for timber companies?

11:38:32 20 A. Mustapha Jallow was assigned at ALTCO. I think that I  
21 mentioned that at some time during my testimony.

22 Q. That's in Lofa County, correct?

23 A. That's correct.

24 Q. And that was a timber company, that company?

11:38:44 25 A. It was a timber company also.

26 Q. It was cutting trees and selling timber?

27 A. Yes.

28 Q. Any others?

29 A. Yes, Ibrahim Bah was assigned with B&B company in Grand

1 Bassa.

2 Q. What years was Ibrahim Bah assigned to the B&B company?

3 A. Well, I can't - I don't know, but I think it should be  
4 between 1990 going into some early part of '92, I think.

11:39:11 5 Q. And what this also a company that was cutting trees and  
6 selling - in the timber business?

7 A. Quite correct.

8 Q. Now, sir, who owned B&B, do you know?

9 A. I don't know.

11:39:21 10 Q. Who owned ALTCO, do you know?

11 A. I don't know.

12 Q. How about the company you worked for in the southeast?

13 A. Yes, I know who owned the company.

14 Q. Who is that sir?

11:39:32 15 A. His name is Nassir Charafeddine.

16 Q. I believe you spelt that previously. Sir, in all of these  
17 assignments of the three Gambians - yourself and the other two  
18 Gambians, all of you were NPFL. It was part of an NPFL  
19 assignment; is that correct?

11:39:50 20 A. That's correct, yes.

21 Q. To your knowledge, why was the NPFL providing security to  
22 this timber companies?

23 A. Because these timber companies at some point complained  
24 that they were receiving harassment from NPFL soldiers sometimes

11:40:05 25 and to avoid that, because Mr Taylor never want any soldier to  
26 harass civilians, especially business entities. As a result of  
27 that these people requested for security, and Mr Taylor responded  
28 by, you know, providing security for them.

29 Q. And who paid for the security, do you know?

1 A. The people that were providing the security for - paid -  
2 they paid for it. They were not paying like, you know, on a  
3 monthly salary, but, you know, they were given subsistence in  
4 terms of food. If you have our own car, they help you with the  
11:40:33 5 logistics like gasoline, fuel, oil.

6 PRESIDING JUDGE: Sorry, did you say the people that were  
7 providing the security were paying for it?

8 THE WITNESS: I'm saying the owners of the company.

9 MR KOUMJIAN:

11:40:48 10 Q. Sir, were the timber companies paying any money to the NPFL  
11 or Charles Taylor?

12 A. Timber companies were paying taxes to the NPRAG government  
13 during the time of its establishment.

14 Q. Okay. Your assignment in 1993 to the timber company, how  
11:41:09 15 long did that last for?

16 A. That lasts up to 1995.

17 Q. And where did you go in 1995?

18 A. In 1995 I came down to Gbarnga to escort Mr Taylor to  
19 Monrovia.

11:41:20 20 Q. So in 1995 you went to Monrovia with Mr Taylor. Is that  
21 correct?

22 A. That's correct.

23 Q. Do you recall what month it was you went to Gbarnga to  
24 escort Mr Taylor to Monrovia?

11:41:36 25 A. I think it should be around the end of September and I  
26 think - I mean, sorry, in the end of August and I think we came  
27 to Monrovia in September, if I'm not mistaken, yes.

28 Q. What was your assignment once you got to Monrovia?

29 A. I was still assigned with Mr Taylor as a security.

1 Q. What was your next - how long did you remain in that  
2 assignment as a security for Mr Taylor in Monrovia?

3 A. I remained in that assignment until I was appointed as  
4 assistant director for operations for the SSS.

11:42:14 5 Q. When were you appointed the assistant director for  
6 operations?

7 A. I was appointed in 1998.

8 Q. Do you remember the month?

9 A. No, I can't remember the month, but it was like towards the  
11:42:27 10 end of '98.

11 Q. Mr Witness, in addition to your work as a security for  
12 Charles Taylor when you were in Monrovia, did you have other  
13 assignments?

14 A. No, I have no other assignment - my only assignment was  
11:42:58 15 security.

16 Q. Okay. But when was it that you were the liaison to ECOMOG?

17 A. That was far back, 19 - you're talking about from - it was  
18 far back in 1991 going up to '92.

19 Q. So that was before you were assigned to the southeast,  
11:43:13 20 correct?

21 A. That's correct, yes.

22 Q. And you were working out of what base when you were the  
23 liaison with ECOMOG?

24 A. I had an office at the ECOMOG headquarters in Monrovia.

11:43:26 25 Q. Sir, we have to do this again because - well, let me just  
26 proceed. At that time your assignment was to build confidence in  
27 ECOMOG, to build ECOMOG's confidence in the NPFL, that they could  
28 work with the NPFL, correct?

29 A. Not only building confidence. It was part of my work.

1 Q. Part of your work was to get the trust of ECOMOG, correct?

2 A. Yes, it was part of it, yes.

3 Q. And you were in that assignment until Operation Octopus,  
4 correct?

11:44:00 5 A. That's correct.

6 Q. And in that assignment - Operation Octopus is when the  
7 NPFL, in an operation, attacked ECOMOG attempting to push them  
8 out of Monrovia, correct?

9 A. That's correct.

11:44:14 10 Q. At that time allied with Prince Johnson's group, INPFL,  
11 correct? The NPFL was allied with Prince Johnson at the  
12 beginning of that operation?

13 A. Correct.

14 Q. But sometime during the operation Prince Johnson dropped  
11:44:36 15 out of the alliance. Is that correct?

16 A. That's correct.

17 Q. That operation was designed by John T Richardson, correct?

18 A. I don't know who designed the operation.

19 Q. Have you heard John T Richardson referred to as Mr Octopus?

11:44:51 20 A. Yes, his code name is Octopus.

21 Q. So you've told us about your assignment up to being  
22 appointed assistant director of operations of the SSS, correct?

23 A. Can I make a point here, please?

24 Q. Yes, sir.

11:45:16 25 A. Can I make a point? John T obtained the code name Octopus  
26 before Operation Octopus. It was not during Operation Octopus  
27 that he obtained that name. That name - code name has been his  
28 code name from the time I knew him. So it was not specified to  
29 the time of Operation Octopus.

1 Q. But Operation Octopus was given that name because John T  
2 Richardson was the architect, correct?

3 A. That's what you said. That's not what I said.

4 Q. Well, I'm asking you. You're the witness.

11:45:43 5 A. I don't know who - I can't remember John to be the  
6 architect of Octopus.

7 Q. Who did the military planning for the NPFL?

8 A. The military planning? I mean, the commanders would do the  
9 planning.

11:45:55 10 Q. Well, who was the highest commander of the NPFL?

11 A. The highest commander in terms of what? Military?

12 Q. Yes, sir.

13 A. Isaac Musa was at one time.

14 Q. Well, was Isaac Musa the commander-in-chief?

11:46:08 15 A. No. But you didn't say the commander-in-chief. You said  
16 the military commander.

17 Q. What does commander-in-chief mean?

18 A. Commander-in-chief? Commander-in-chief means the President  
19 of the republic of the country, CIC.

11:46:22 20 Q. Who was that?

21 A. The time we had the NPRAG, Charles Taylor was the  
22 commander-in-chief of the NPRAG.

23 Q. When did people start calling Charles Taylor CIC?

24 A. When the NPRAG government was formed.

11:46:36 25 Q. When did people start calling Charles Taylor  
26 "Mr President"?

27 A. When the NPRAG government was formed.

28 Q. What year was that, remind us?

29 A. Well, I don't - I can't - it should be '91.

1 Q. Sir, you replaced Varmuyan Sherif in the position of deputy  
2 director for operations. Is that correct?

3 A. Yes, I did.

4 PRESIDING JUDGE: Is that deputy or assistant?

11:47:13 5 MR KOUMJIAN:

6 Q. Deputy I believe, is that correct?

7 A. No, assistant director for operations.

8 Q. Thank you. Can you tell us what the duties were of that  
9 position.

11:47:20 10 A. The duties of that position was to take care of the  
11 security of the President, specifically when the - during the  
12 movement, you know by - you supervise the operations sections of  
13 the SSS, the motorcade, the base shift and the movement of the  
14 President.

11:47:52 15 Q. Did you say base shift?

16 A. When I say base shift, when we talk about base, bases that  
17 where the President - the office and his office, we have people  
18 assigned at those places. We call them base shift.

19 Q. Now, sir, when you were a radio operator, quickly, did you  
11:48:10 20 have any training outside of Libya?

21 A. Are you finished?

22 Q. Yes, sir.

23 A. When I came into Liberia I did brief training on the  
24 Flyaway, yes.

11:48:24 25 Q. And that's the only training you did?

26 A. Outside of Liberia, yes.

27 Q. Outside of Libya, is that what you meant?

28 A. Outside of Libya, yes.

29 PRESIDING JUDGE: What is a Flyaway?



1 THE WITNESS: Flyaway, I think I mentioned, it's a radio,  
2 it's a type of radio that is in a briefcase. We used to call it  
3 Flyaway.

4 MR KOUMJIAN:

11:48:43 5 Q. Well, explain exactly what a Flyaway is when you say it's  
6 type of radio. What frequency range did it have?

7 A. It Flyaway is a radio that's built in like a briefcase that  
8 you can open and close, you know, and handle like a briefcase.

9 Q. What frequencies did it operate on?

11:49:01 10 A. It operated on a lot of frequencies.

11 Q. Which ones?

12 A. It can operate on VHS.

13 Q. Sir, a Flyaway a satellite telephone, isn't it?

14 A. That's not correct. A Flyaway is not a satellite  
11:49:17 15 telephone.

16 Q. It's in a silver briefcase, correct?

17 A. But it is not a satellite telephone. A Flyaway is not a  
18 satellite telephone. It's a communication radio.

19 Q. Sir, from a Flyaway you can call a phone number anywhere in  
11:49:28 20 the world, correct?

21 A. No, from a Flyaway you cannot call any phone number  
22 anywhere in the world. You cannot call a phone number anywhere  
23 in the world.

24 JUDGE DOHERTY: I don't recall getting an answer to the  
11:49:41 25 question, "It's in a silver briefcase, correct?"

26 THE WITNESS: Yes, the colour of the briefcase is like  
27 silver. It's not really silver as it is, but it's a silver  
28 colour, let me say that.

29 MR KOUMJIAN: Could the witness be shown the photograph

1 behind tab 7 of the Prosecution documents:

2 Q. Sir, can you see the photograph?

3 A. Yes.

4 Q. First, do you recognise the person seated in the blue  
11:51:10 5 chair?

6 A. Yes.

7 Q. Who's that?

8 A. Charles Taylor.

9 Q. And the silver item to his right on the left of the  
11:51:16 10 photograph, what is that?

11 A. That's the Flyaway radio.

12 Q. And, sir, if we can go back to the picture for a moment.

13 Do you see - I don't know if the witness has the photograph.

14 Does he? Yes. Do you see the person to Charles Taylor's right,

11:51:39 15 between the legs there appears to be a rectangular silver

16 metallic object? Do you see that?

17 A. Between his legs?

18 Q. Well, in the photograph it's between the legs of the person

19 to Charles Taylor's right on the left of the photograph, just

11:51:58 20 where his hands are held together. Do you see just to the right

21 of the hands what appears to be a silver rectangular object?

22 A. Are you referring to this?

23 Q. I can't see you point. You'll have to point on the other

24 photo from the other seat. Could you take the other seat. Can

11:52:37 25 you point again to what you think I'm referring to, the silver

26 rectangular object?

27 A. Are you referring to this?

28 Q. No, sir. All the way on the other side of the photograph,

29 just above the silver briefcase, you see the person with the

1 yellow hat on, between the legs of that person, the person with  
2 the yellow hat on, not Charles Taylor. Keep going.

3 A. This?

4 Q. Go down. You see where your pen is right now?

11:53:04 5 A. This?

6 Q. Yes. Do you see just beyond the pen there's a silver  
7 rectangular object?

8 A. Well, I don't know how it appears to you, but it doesn't  
9 appear silver to me. Are you talking about this?

11:53:14 10 Q. The microphone needs to be moved close to the witness, I  
11 believe.

12 PRESIDING JUDGE: Mr Koumjian, are you referring to an open  
13 box like or case like?

14 MR KOUMJIAN: I'm not referring to -

11:53:26 15 Q. I'm talking about the briefcase itself, sir. I'm talking  
16 what appears to be a thin silver object --

17 PRESIDING JUDGE: There is nothing rectangular beyond that,  
18 unless you are misstating the shape of the object.

19 MR KOUMJIAN:

11:53:44 20 Q. Looking at the photograph, just to the right of the  
21 person's hands. Can you point again to where you were pointing  
22 before, sir?

23 A. Are you talk about this?

24 Q. Yes, sir.

11:54:01 25 A. I don't know what this is.

26 Q. Okay. That's my question. You don't know what it is?

27 A. I don't know what is this.

28 Q. Okay. You can take your seat. You can return to your  
29 seat. Sir, this Flyaway you could reach the United States,

1 correct?

2 A. I never spoke to the United States on the Flyaway.

3 Q. That wasn't my question.

4 A. I don't know.

11:54:26 5 Q. You don't know?

6 A. No.

7 Q. Isn't it a fact that soldiers, NPFL soldiers, used to use  
8 the Flyaway to call people they knew in the United States?

9 A. Flyaway was not a common radio in the NPFL. As far as I'm  
11:54:40 10 concerned, we had only two Flyaways. So, if you say NPFL  
11 soldiers using Flyaway to communicate with relatives in the  
12 United States, I don't know what you're talking about.

13 Q. You could connect from the Flyaway through something called  
14 Portoshare to telephones anywhere in the world. Is that correct?

11:54:57 15 A. I don't know what you're talking about. It's possible,  
16 yes.

17 Q. You don't know that?

18 A. No. I never did it before.

19 Q. Let me complete your biography before going back to some of  
11:55:29 20 these subjects. Did you consider the assistant director for  
21 special operations an important position?

22 A. Assistant director for special operations? What special  
23 operations are you talking about?

24 Q. Your position with the SSS, did I misstate it again?

11:55:51 25 A. It was not special operations. Assistant director for  
26 operations.

27 Q. Did you consider that an important position?

28 A. Yes, it is an important position.

29 Q. Was it a position that required the trust of the President?

1 A. Defi ni tel y, yes.

2 Q. Who appointed you to that posi ti on?

3 A. Presi dent Tayl or appointed me to that posi ti on.

4 Q. Now, what was the chain of command from your posi ti on up?

11:56:18 5 Who did you report to?

6 A. I report to the deputy di rector and the di rector of SSS.

7 Q. When you say the deputy di rector, which deputy --

8 A. The deputy di rector for opera ti ons.

9 Q. Okay. Slow down a lit tle bit again. Thank you. You

11:56:30 10 reported to the deputy di rector of opera ti ons, and who did the  
11 deputy di rector of opera ti ons report to?

12 A. The deputy di rector for opera ti ons reports to the di rector  
13 of SSS.

14 Q. Who did the di rector of SSS report to?

11:56:44 15 A. The di rector of SSS reports to the Presi dent.

16 Q. So al though your posi ti on was three levels down from  
17 Mr Tayl or - in other words, there was the di rector, Benjami n  
18 Yeaten, the deputy di rector, and then you - you were appointed by  
19 the Presi dent, correct?

11:57:01 20 A. Yes.

21 Q. How about when it came to NPFL fi eld commands? Who  
22 appointed, let's say, di vi si on commanders or battal i on  
23 commanders?

24 A. Battal i on commanders are being recommended by the battle  
11:57:18 25 group commander.

26 Q. Who appoints them?

27 A. They are appointed by the commander-in-chief.

28 Q. How about the - what was the deputy to the battal i on  
29 commander called? Was he called deputy battal i on commander or

1 was he called --

2 A. Deputy battalion commander, yes.

3 Q. Was that person appointed by the President on the  
4 recommendation of others?

11:57:44 5 A. No, the commander - the battle group commander can appoint  
6 commanders as well as deputy commanders. Not in all cases.

7 Q. Sir, how long were you in this position with the SSS of the  
8 assistant director?

9 A. I was there from the time of my appointment in 1998 to July  
11:58:09 10 2000.

11 Q. And July 2000, what happened that you were no longer in  
12 that position?

13 A. I was appointed as charge d'affaires to the embassy of the  
14 Republic of Liberia in Tripoli, Libya.

11:58:22 15 Q. Sir, between the time that Varmuyan Sherif - you said  
16 Varmuyan Sherif was arrested, is that right?

17 A. Yes, at one point, yes, he was arrested.

18 Q. Did he lose the position, or did he leave the position when  
19 he was arrested?

11:58:37 20 A. He was incarcerated and later on he was relieved of his  
21 duties. He was no longer in the position.

22 Q. How long between when Varmuyan Sherif was arrested and when  
23 you assumed the position of assistant director?

24 A. I think it took some time. Maybe about two, three months.

11:58:55 25 Q. What was Varmuyan Sherif arrested for?

26 A. I don't know what he was arrested for, but I know he did  
27 something that warranted his arrest.

28 Q. Who ordered his arrest?

29 A. He was ordered arrested by the director of SSS.

1 Q. And you don't know what it was for?

2 A. No, I don't know what he actually did, actually.

3 Q. Did you hear that he was arrested for looting?

4 A. I don't know what he was arrested for.

11:59:27 5 Q. Let us continue with your biography before I get  
6 sidetracked. Sir, when you were appointed - when you left the  
7 position as assistant director, what was the position you were  
8 appointed to?

9 A. I was appointed as charge d'affaires to the embassy of the  
11:59:44 10 Republic of Liberia in Tripoli, Libya.

11 Q. And how long did you remain in that position?

12 A. I remained in that position until February 2005.

13 Q. How long did you maintain that title?

14 A. I maintained that title up to the time of my recall in 2005  
12:00:02 15 and I remain - I'm still minister plenipotentiary in the foreign  
16 service, for your information.

17 Q. Sir, you've told this Court a couple of times that you were  
18 ambassador to Libya. Do you recall that?

19 A. Yes, charge d'affaires is called an ambassador because he's  
12:00:18 20 the head of the mission.

21 Q. In fact, that - a charge d'affaires is not an ambassador by  
22 definition, correct?

23 A. Charge d'affaires - we consider charge d'affaires - we call  
24 him - we call them ambassador, not - I mean, plenipotentiary and  
12:00:32 25 head of mission, I was called an ambassador. Even the host  
26 country can call me an ambassador.

27 Q. Sir, the title charge d'affaires, it's a diplomatic term,  
28 correct?

29 A. Yes.

1 Q. It means the person in charge of an embassy when the  
2 ambassador is not present in a country, correct?

3 A. Yes, that we call at interim. When an ambassador is not  
4 present you are there holding on as charge d'affaires until the  
12:01:00 5 arrival of the ambassador, we call you charge d'affaires AI. But  
6 if you are there as charge d'affaires permanently, you can be  
7 referred to as ambassador.

8 Q. Sir, you were not the ambassador, correct?

9 A. I consider myself as the ambassador because I was  
12:01:14 10 representing Liberia at the time in Libya, so I consider myself  
11 as an ambassador.

12 Q. But you were never named or accredited by the Libyans as  
13 the ambassador for Liberia. You were only accredited, named and  
14 accredited as the charge d'affaires, correct?

12:01:29 15 A. Yes, I agree with you, but I was still called by the  
16 Libyans as ambassador.

17 Q. Sir, why was it, if you were the top ranked official in the  
18 embassy in Libya, that you were not appointed ambassador?

19 A. Are you asking me why was it that I was not appointed as  
12:01:46 20 ambassador.

21 Q. Yes. Did Charles Taylor ever nominate you as ambassador?

22 A. No, I was not nominated as ambassador.

23 Q. Do you know why?

24 A. The process was being - it was being processed and before  
12:01:54 25 that, that's when, you know, he left.

26 Q. Well, you were in that position for over three years before  
27 he left, correct?

28 A. That's correct.

29 Q. And you were never nominated by Charles Taylor as the



1 ambassador to Libya, correct?

2 A. For your information, the nomination for somebody be an  
3 ambassador, you know, there are certain protocols you need to  
4 follow. You just don't nominate somebody as ambassador and the  
12:02:20 5 person goes automatically as ambassador. If you nominate  
6 somebody as an ambassador, the request has to be sent in. It has  
7 be requested - I mean, there has to be a request made to the host  
8 country. They have to accept it. The response comes before you  
9 will be sworn in as ambassador and go to that country. So they  
10 don't just appoint you as ambassador and you just jump up and go.  
11 You have to be confirmed and all before you can go.

12 Q. Thank you for that information. Sir, again let's take it  
13 slowly. Were you ever nominated - you've explained the process  
14 can take time. Did Charles Taylor ever nominate you as  
12:02:54 15 ambassador?

16 A. I can't remember. But since I left, the Foreign Ministry  
17 told me they were in the process.

18 Q. You can't remember whether or not you were nominated by the  
19 President of your country to be ambassador?

12:03:05 20 A. Yes, of course, it can happen. I was told that I will be  
21 nominated. So while I was there, I don't know whether it took  
22 place or not. But I am telling you I was called an ambassador.

23 Q. So no one ever told you that Charles Taylor nominated you  
24 as ambassador, is that correct?

12:03:20 25 A. Yeah, that's correct. Okay, let's take that to be correct,  
26 yes.

27 Q. Do you have any idea why that was?

28 A. I don't know.

29 Q. Was it perhaps because of your citizenship, sir?

1 A. I was a Liberian citizen before I was appointed as  
2 ambassador - as charge d'affaires to Libya.

3 Q. Can you explain the process by which you became a Liberian  
4 citizen?

12:03:39 5 A. To become a Liberian citizen you have to be sworn in before  
6 a judge, and I did that.

7 Q. Where did you do that, sir?

8 A. I did that in Monrovia at the Temple of Justice.

9 Q. And did you take an oath?

12:03:52 10 A. Yes, I took an oath.

11 Q. Do you have the paperwork from that?

12 A. I was never asked to bring that paperwork here, so I never  
13 brought it with me.

14 Q. That's fair enough. I'm asking you do you have it?

12:04:02 15 A. Yes, I do.

16 Q. And what does it consist of, sir?

17 A. That's a citizenship certificate.

18 Q. Thank you. So that would exist for anyone who was made a  
19 citizen of Liberia through this naturalisation process?

12:04:15 20 A. Definitely, yes.

21 Q. Do you remember the oath that you took?

22 A. Yes, you pledge allegiance to the country.

23 Q. And what else does it say, do you recall?

24 A. I can't recall. It's been a long - it's been some time  
12:04:38 25 now.

26 Q. Let me see if I can refresh your recollection at all.

27 Could the witness be shown MFI-303B. Mr Witness, what we have  
28 here are sections of the Alien and Nationality Law of Liberia.

29 I'd ask the Court Officer please to turn to section 21.6. Sir,

1 this section is entitled "Oath of Allegiance". I'm going to just  
2 read it to you - it's just a paragraph - to see if it refreshes  
3 your recollection:

4 "A person who has petitioned for naturalisation shall, in  
12:06:19 5 order to be admitted to citizenship, take in open court an oath,  
6 to be administered by the judge that:

7 (a) He will support and defend the constitution and laws  
8 of the Republic of Liberia against all enemies, foreign and  
9 domestic;

10 (b) He renounces and abjures absolutely and entirely all  
11 allegiance and fidelity to every foreign prince, potentate, state  
12 or sovereignty whatever and particularly to the one of which he  
13 was previously a citizen or subject;

14 (c) He will observe full faith and allegiance to the  
12:07:12 15 Republic of Liberia; and

16 (d) He will bear arms on behalf of Liberia when required  
17 by law."

18 Sir, is this the oath that you took?

19 A. Yes.

12:07:32 20 Q. Sir, when you took this oath, did you renounce all and -  
21 absolutely entirely all allegiance and fidelity to The Gambia?

22 A. Yes, I did.

23 Q. So, sir, how do you say you are now a citizen of The  
24 Gambia?

12:07:52 25 A. Did I say I was a citizen of The Gambia?

26 Q. Yes, sir, you did.

27 A. Well, that might be I made a mistake.

28 Q. You're not a citizen of The Gambia?

29 A. I'm not a citizen of The Gambia now.

1 Q. Thank you. Sir, we've reached the point where you were the  
2 charge d'affaires up until 2005. Which month did you leave?

3 A. From where?

4 Q. When were you the charge d'affaires to Libya? Until what  
12:08:32 5 time?

6 A. Up to - I came back to Liberia in February 2005.

7 Q. What government was in power in Liberia at that time?

8 A. It was the transitional government.

9 Q. So the money that is owed you was from the time that you  
12:08:49 10 worked for Charles Taylor, or for the transitional government, or  
11 both?

12 A. I said the Foreign Ministry, they owed us a lot of money,  
13 but the Foreign Ministry or the government - present government  
14 only said they would pay arrears from 2003 until 2005. According  
12:09:10 15 to the government, they are not responsible for the rest. They  
16 can't pay that because of the financial situation in the country.

17 Q. Just so I understand your particular situation, the salary  
18 that was not paid to you is from what period of time?

19 A. The salary that was not paid to me was from 2000, 2001,  
12:09:30 20 2002 onwards.

21 Q. So you never received salary while you were in Libya. Is  
22 that correct?

23 A. No, that's not correct.

24 Q. Okay. Please explain.

12:09:40 25 A. I received salaries. Not full salaries, but I received  
26 salaries.

27 Q. Okay. What was the salary you were supposed to receive?

28 A. When you say what was the salary I was supposed to receive,  
29 my monthly salary?

1 Q. Yes, sir.

2 A. Are you referring to my monthly salary?

3 Q. Yes, sir, I am.

4 A. The amount, you're asking?

12:10:00 5 Q. Yes, sir, I'm asking the amount. And just so we're clear  
6 you can tell me the currency - whichever currency you choose to  
7 state it in?

8 A. In Libya as charge d'affaires my salary was 1,000 US  
9 dollars.

12:10:15 10 Q. And how much of that --

11 PRESIDING JUDGE: Excuse me, Mr Koumjian, there is an  
12 answer I don't understand where the witness says that the salary  
13 that was not paid to me was from 2000, 2001, 2002 onwards. Is  
14 that correct?

12:10:28 15 THE WITNESS: Yeah, there were times - times - some months  
16 in 2000, 2001, 2002 that it was not paid.

17 PRESIDING JUDGE: So you mean that while you were in Libya  
18 working as charge d'affaires, you were paid part salary?

19 THE WITNESS: Yes, sometimes, you know - sometimes salary  
12:10:47 20 delays and that, you know, not all the time we receive salaries.

21 PRESIDING JUDGE: Please proceed.

22 MR KOUMJIAN:

23 Q. Approximately what portion of the salary did you receive?

24 Let's just take 2001, that full year. Would you say you got a

12:11:02 25 quarter of your salary? How much of your salary do you think you  
26 received?

27 A. I can't remember. The records are not before me, so I  
28 don't want to speculate here.

29 Q. Sir, how do you demand money from the government if you

1 don't know how much is owed to you?

2 A. Yes, but I look at the documents. The documents before me,  
3 I look at them, I know what I was owed, you know, before I put in  
4 a paper. So the documents are not ahead of me, so supposing I  
12:11:26 5 call a figure here and it proves to be not correct; you will say  
6 I'm lying, and I don't want to lie.

7 Q. Okay, sir. Do you remember - you put in some paperwork  
8 with a demand for salary arrears, correct?

9 A. Yes.

12:11:37 10 Q. That was to the present government, correct?

11 A. Yes.

12 Q. And do you recall the total that you were asking for?

13 A. No, I can't remember the total. I don't want to be - I don't  
14 want to mislead the Court.

12:11:47 15 Q. Were you recalled by the transitional government or by the  
16 government of President Sirleaf?

17 A. I was recalled by the transitional government.

18 Q. And, sir, what did you do after you were recalled?

19 A. When I came to Monrovia I reported at the Foreign Ministry  
12:12:11 20 as usual.

21 Q. Now, sir, since you came back - and that was in 2005,  
22 correct?

23 A. Yes.

24 Q. Have you have been outside of Liberia?

12:12:19 25 A. Yes.

26 Q. Where have you been?

27 A. I went to Ghana for a visit.

28 Q. Anywhere else, sir?

29 A. Yes. I went to Ghana two times.

1 Q. Who did you visit with?

2 A. I visit friends.

3 Q. Was Musa Cisse one of the people you visited?

4 A. Musa Cisse never lived in Ghana.

12:12:42 5 Q. Okay. Who did you visit?

6 A. I visit my friends.

7 Q. I understand. Can you give us the names?

8 A. No.

9 Q. Why is that, sir?

12:12:50 10 A. I say I visit them. They might not appreciate their names  
11 being called in court.

12 Q. Why is that, sir?

13 A. Well, what do you mean? You have to seek permission.  
14 Everybody doesn't want their names to be mentioned in court here.

12:13:02 15 Q. Why would someone not want their name to be mentioned as  
16 someone you visited?

17 A. Well, I don't know. Do I know whether he wants his name to  
18 be mentioned - the person wants his name to be mentioned here? I  
19 don't know.

12:13:11 20 Q. Sir, are you requesting to mention the name in private  
21 session? Is that your request?

22 A. I can mention the name here, if you want to, but I don't  
23 know whether the person would appreciate it. In fact, the person  
24 is not in Ghana presently.

12:13:25 25 Q. I would ask the witness to answer the question.

26 A. The person I went to visit in Ghana was one Henry Hotse,  
27 who is a Togolese national, residence in Germany, who wanted he  
28 and myself to do some business. He contacted me and he asked for  
29 us to meet in Ghana. I went there to meet him on two occasions.

1 PRESIDING JUDGE: What is the surname again?

2 THE WITNESS: Henry Hotse. I think it's H-O-T-S-E.

3 MR KOUMJIAN:

4 Q. Did you see Grace Minor when you were in Ghana?

12:13:51 5 A. I never saw Grace Minor in Ghana.

6 Q. Is there any other countries that you've been to since you  
7 returned to Liberia in 2005?

8 A. No, I can't remember.

9 Q. You can't remember or you're sure that you didn't go  
12:14:04 10 anywhere else?

11 A. I can't remember. Yes, okay, I went to - this same guy,  
12 this same person came to Burkina Faso and I went. He and I met  
13 there too, yes.

14 Q. What year was that?

12:14:14 15 A. Let me see. Henry? I think it was in 2007, yes - 2008.  
16 2008. Sometime in 2008.

17 Q. Sir, let's go back then to where we were before the break.  
18 We were talking about whether the Gambians in Burkina Faso had a  
19 plan and you said you did have a plan. Can you explain that  
12:14:49 20 plan?

21 A. Yeah, we had had a plan, because we undertook a mission  
22 that failed and we still had a plan to undertake that mission  
23 again.

24 Q. So the mission that failed, you're talking about the 1981  
12:15:05 25 coup?

26 A. That's correct.

27 Q. Now, how many Gambians were in Burkina Faso?

28 A. That's why I said I have to, you know - I don't know - I  
29 can't remember the exact number, but I know everybody that -



1 everyone that was there.

2 Q. Okay. So it was something other - under two dozen, would  
3 that be correct?

4 A. Yes, it's under two dozen. It's not two dozen.

12:15:27 5 Q. You didn't have enough men to have any hope of a successful  
6 coup at that time - a successful revolution if you entered Gambia  
7 at that time, correct?

8 A. That's not correct.

9 Q. Why didn't you go and launch your revolution in Gambia?

12:15:40 10 A. Because we were not ready.

11 Q. You had your training. What were you waiting for?

12 A. It doesn't mean when you have training you just jump up and  
13 go commit suicide. You have to plan.

14

12:15:51 15 Q. Correct. What were you waiting for?

16 A. We are waiting - we are planning and waiting.

17 Q. Waiting for what, sir?

18 A. Waiting for the right time to arrive.

19 Q. Sir, how would you determine it was the right time where  
12:16:08 20 you had a chance for success if you had gone back to The Gambia?

21 A. The time, we do all our plannings and we are set to go.

22 Q. What would you need in order to have a successful  
23 revolution?

24 A. Mr Koumjian - sorry, Mr Counsel, I'm not - I don't think I  
12:16:29 25 can sit down here and discuss with you about what I need to stage  
26 a revolution. I would not sit down here to explain all what I  
27 need to do in a revolution. I need planning and I need a timing,  
28 a good timing before I can launch a revolution.

29 Q. Sir, do you need arms to launch a revolution?

1 A. If you want to launch a revolution, you don't have to  
2 physically carry arms. You can launch a revolution, whatever -  
3 as commandos, we are trained. We can go into a country. You  
4 attack and get arms from the enemy that you are attacking. We  
12:17:03 5 have those tactics. You don't have to take arms and carry them  
6 with you physically before you go and launch a revolution.

7 Q. You said your plan was to wait until you were set to go.  
8 And once again I'm asking you, can you explain what was it that  
9 you were waiting to obtain?

12:17:24 10 A. We were waiting for the right time.

11 Q. And how would you determine it was the right time?

12 A. When the right time reached, then we would determine the  
13 right time has reached for us to go.

14 Q. Did it ever occur to you to seek outside assistance with  
12:17:37 15 your revolution?

16 A. No. The only place we might seek assistance from would be  
17 from Libya, the people that trained us.

18 Q. Why only from Libya?

19 A. Because they are only person that promise us that if, how  
12:17:50 20 do you call it, we are ready they would assist us.

21 Q. Why wouldn't you ask for assistance from others?

22 A. Because we - which others are you talking about?

23 Q. Any other group or nationality or entity that would give  
24 you assistance.

12:18:04 25 A. Because I don't know any other group or nationality that  
26 can give me assistance.

27 Q. Slow down and pause. Wait a second or two after I ask the  
28 question to answer. Well, did you try, did your group try to  
29 obtain assistance from other groups?

1 A. No, we didn't try to obtain any assistance from other  
2 groups.

3 Q. Sir, would it have been helpful to you in your plans to  
4 have more manpower?

12:18:25 5 A. No. It doesn't matter to us. We, the group, we can do  
6 whatever we want to do.

7 Q. Would it be helpful to you as a group to have more  
8 financial resources?

9 A. It doesn't matter to have more financial resources.

12:18:36 10 Q. Financial resources don't affect the chances of a  
11 successful revolution at all?

12 A. It doesn't have to.

13 Q. Sources for arms and ammunition, do they affect the chances  
14 of a successful revolution?

12:18:50 15 A. As I said, revolutions don't have to get arms before they  
16 stage a revolution.

17 Q. So your answer is it doesn't matter whether or not --

18 A. It doesn't matter. It doesn't matter.

19 Q. Can you please wait until I finish the question. Did it  
12:19:12 20 ever occur to you that maybe your group should ask the others  
21 that you trained with in Libya to assist you?

22 A. We never asked any group that we trained to in Libya to  
23 assist us.

24 Q. So your plan, you were devoted to the revolutionary ideas  
12:19:30 25 and you're in Burkina Faso, suffering, would that be correct,  
26 somewhat, in order to fulfil this ideal of bringing justice and  
27 equality to The Gambia? Is that correct?

28 A. That's not correct. We were not there suffering. That's  
29 wrong.

1 Q. Was life difficult in Burkina Faso at that time?

2 A. We were not getting all the luxuries we want, but we were  
3 being fed three times a day and we got basically everything that  
4 we need.

12:19:54 5 Q. Did you have anything to do?

6 A. No, we were not working.

7 Q. So you've talked about the decision to go to Liberia that  
8 was made. Who made that decision?

9 A. The decision was made by us. Our leader suggested it to  
12:20:13 10 us.

11 Q. That's Kukoi Samba Sanyang?

12 A. You are correct.

13 Q. Dr Manneh, correct?

14 A. Correct, yes.

12:20:19 15 Q. By the way, just speaking of Dr Manneh, he was never a  
16 member of MOJA, correct?

17 A. Dr Manneh was not a member of MOJA, yes.

18 Q. And he was the leader of SOFA, a different organisation?

19 A. That's correct, yes.

12:20:33 20 Q. In fact, the MOJA leaders were at odds somewhat with  
21 Dr Manneh. They were not in alliance, correct?

22 A. I don't know what you're talking about.

23 Q. Mr Sallah that we mentioned this morning, he and Dr Manneh  
24 were not allies, were they?

12:20:49 25 A. I never saw them fussing. I don't know.

26 Q. So, Mr Witness, did you yourself decide that you wanted to  
27 go to Liberia?

28 A. Personally you mean?

29 Q. Yes.

1 A. No.

2 Q. It was an order to me?

3 A. It was not a personal decision.

4 Q. Thank you. It was an order to you?

12:21:12 5 A. Yes. It was decided by the group, our group.

6 Q. Were you in the meeting where that was decided?

7 A. Yes. Among ourselves, the Gambians, we had a meeting with  
8 Dr Manneh, yes.

9 Q. And tell us what the reasoning was behind this group  
12:21:30 10 decision to go to Liberia.

11 A. Because at the time we heard Prince Johnson has broken away  
12 from the main NPFL and the security situation was volatile there,  
13 so we decided that we should ask Mr Taylor for us to go in and  
14 him provide security for him.

12:21:48 15 Q. Now, Prince Johnson was Special Forces like you, correct?

16 A. Correct, yes.

17 Q. He was a colleague who had trained in the camps like you,  
18 correct?

19 A. Correct, yes.

12:21:58 20 Q. How many times had you spoken to him?

21 A. Prince Johnson and myself, we don't talk. We can speak to  
22 one another, "Hello." "Hello." That's all.

23 Q. How about Samuel Varney, did you know him?

24 A. Exactly, "Hello." "Hello."

12:22:10 25 Q. But you would see him often because you were training  
26 together, correct?

27 A. Yes, sometimes, yes.

28 Q. Now, why did you feel you wanted to help Charles Taylor  
29 against Prince Johnson? Why did you want to be on one side of

1 that Liberian dispute as opposed to the other?

2 A. Well, what do you mean why I want to be on one side? I was  
3 not on - I was never on any other side. We went in there to  
4 provide security for Mr Taylor because of the fact that Prince  
12:22:37 5 Johnson and some other Special Forces had broken away from him.

6 Q. My question is, and perhaps I wasn't clear, so you  
7 understand: Why would you go and provide security for  
8 Charles Taylor as opposed to, for example, going to provide  
9 security for Prince Johnson?

12:22:53 10 A. Who is Prince Johnson? I don't know Prince Johnson to be  
11 anybody for me to provide security for him.

12 Q. Well, sir, you didn't know Charles Taylor, did you?

13 A. I knew Charles Taylor.

14 Q. You did?

12:23:00 15 A. Yes, I knew him.

16 Q. How many times did you talk to him before that decision to  
17 go to Liberia?

18 A. I talked to him when I came to Burkina; I talked to him  
19 once, twice. I saw him and we spoke.

12:23:11 20 Q. What did you talk about?

21 A. We just spoke. We didn't talk about any other thing.

22 Q. So the same as with Prince Johnson, "Hello." "Hello"?

23 A. Prince Johnson, since I entered Liberia, I never saw him  
24 until when we got into Monrovia.

12:23:24 25 Q. Well, your extent of your contacts with Charles Taylor,  
26 were they equal to, greater than - first, were they equal to your  
27 contacts with Prince Johnson?

28 A. I never had contact with Prince Johnson.

29 Q. Well, you told us you used to say, "Hello." "Hello," and

1 you trained together.

2 A. Yeah, but if you say "contact", I'm talking about in Libya.

3 While we are training we used to say, "Hello." "Hello," yes.

4 But since I entered Liberia, I never had contact with Prince

12:23:51 5 Johnson.

6 Q. What was it about your meetings with Charles Taylor that

7 made you want to help him and not Prince Johnson?

8 A. Why should I help Prince Johnson? Prince Johnson was not

9 the leader of NPFL. Charles Taylor was the leader of the NPFL.

12:24:01 10 Q. Okay. So the reason you wanted to help Charles Taylor was

11 because he was leader of the NPFL?

12 A. Yes.

13 Q. And you felt that would help the Gambians?

14 A. I never felt that way.

12:24:10 15 Q. Then why did you want to help him?

16 A. I want to help him because I know him as a revolutionary.

17 Q. What was his ideology?

18 A. His ideology was to provide freedom and democracy for his

19 people.

12:24:22 20 Q. What was Prince Johnson's ideology?

21 A. I don't know.

22 Q. Well, how do you know that Charles - was there any

23 difference between Charles Taylor's ideology and Prince

24 Johnson's?

12:24:31 25 A. I know of Charles Taylor's ideology. I don't know about

26 Prince Johnson's ideology.

27 Q. Well, why did you want to help Charles Taylor against

28 Prince Johnson?

29 A. I didn't help Charles Taylor against Prince Johnson. I

1 helped to provide security for him. I never fought against  
2 Prince Johnson. I went in there to provide security for  
3 Charles Taylor.

4 Q. You went into a place you knew was a war zone, correct?

12:24:51 5 A. Definitely, yes.

6 Q. You knew that in a war zone you can get killed, correct?

7 A. Of course, yes.

8 Q. And if Gambians in your group were killed, would that help  
9 or hurt your revolutionary goal?

12:25:02 10 A. It would definitely hurt us. Anybody that lost a soul  
11 would hurt you.

12 Q. So, sir, why did the Gambian group that you were a part of  
13 make a decision to go fight in Liberia?

14 A. Because we want to help a brother.

12:25:18 15 Q. Who you had never talked to about anything except to say  
16 "hello". Is that right?

17 A. Yes. At my level, yes.

18 Q. Charles Taylor's a dyed-in-the-wool capitalist, would you  
19 agree with that?

12:25:32 20 A. Who?

21 Q. Charles Taylor. He's a strong advocate of capitalism,  
22 would you agree?

23 A. That might be your suggestion; that's not mine.

24 Q. You don't agree with that?

12:25:43 25 A. No.

26 Q. You never discussed ideology with him then?

27 A. Never.

28 Q. So you were helping a man and you didn't know his ideology?

29 A. You can take it to be like that, if you wish to.



1 Q. Sir, why did you want to help Charles Taylor?

2 A. I want to help Charles Taylor because he was a  
3 revolutionary fighting for his people, and I was not doing  
4 anything, so I decided to help him.

12:26:08 5 Q. What did you expect to obtain in return?

6 A. I never expected anything in return.

7 Q. So the Gambians risked their lives, risked losing men,  
8 which you were short of, to help a man of an ideology you didn't  
9 know what it was because he was a leader of a revolutionary

12:26:27 10 group. Is that right?

11 MR ANYAH: Madam President, this exchange has been going on  
12 for quite a while. There's a difference between the witness and  
13 his understanding of Charles Taylor's ideology and/or his  
14 personal basis for going into Liberia vis-a-vis the other

12:26:45 15 Gambians. This last question illustrates the complication in all  
16 of this. The question was, "So the Gambians risked their lives,  
17 risked losing men which you were short of to help a man of an  
18 ideology you didn't know?" Is it this witness's knowledge of  
19 Charles Taylor's ideology and the lack of knowledge in that

12:27:13 20 capacity, or is it the Gambians, the entire contingent, including  
21 Dr Manneh's, lack of knowledge of Charles Taylor's ideology?

22 There are several compound questions, no distinction between the  
23 witness's own personal knowledge and the group's personal group  
24 or the witness's personal decisions and the group's personal  
12:27:32 25 decisions, and this is the source of this confusion. So I'm  
26 objecting to the question. It is cross-examination, but counsel  
27 could break them down into independent components.

28 PRESIDING JUDGE: Mr Koumjian, do you have a response to  
29 that comment.

1 MR KOUMJIAN: No, your Honour.

2 PRESIDING JUDGE: Because my own view is that the witness,  
3 as he's been giving his evidence, has stated that the decision of  
4 the Gambians to move into Liberia and join - or provide security  
12:28:01 5 for Mr Taylor was a group decision; it wasn't a personal  
6 decision. I think it is to this that counsel is now addressing  
7 this other question. So I will allow the question, which begins  
8 "So the Gambians risked their lives," et cetera. Please ask it  
9 again.

12:28:25 10 MR KOUMJIAN:

11 Q. Mr Witness, is it correct the Gambians risked their lives,  
12 risked losing manpower, which you were short of, in order to help  
13 a man of an ideology that you weren't aware what his ideology was  
14 simply because he was a leader of the revolutionary group; is  
12:28:45 15 that right?

16 A. As revolutionaries and he's a revolutionary, we decided to  
17 help him, yes. And as a revolutionary, when you go into a war  
18 zone, you expect to die.

19 Q. Was Prince Johnson a revolutionary?

12:28:57 20 A. You can ask Prince Johnson whether he's a revolutionary or  
21 not. I don't know.

22 Q. The camps in Libya, they were camps for training  
23 revolutionaries, correct?

24 A. It's not everybody that trained in those camps are true  
12:29:09 25 revolutionaries.

26 Q. The INPFL was an organisation, correct?

27 A. Yes.

28 Q. Seeking to overthrow the government and gain power,  
29 correct?

1 A. Yes.

2 Q. The same as the NPFL, correct?

3 A. Correct.

4 Q. Sir, how were you transported to Liberia?

12:29:39 5 A. I was transported by road to Liberia.

6 Q. And you said you were escorted to the border by personnel  
7 of the Burkinabe government, correct?

8 A. That's correct.

9 Q. And then from the Ivory Coast border you were escorted by -  
12:29:52 10 was it a military official of the Ivorian government?

11 A. Yes.

12 Q. Now, when you first saw Charles Taylor, where was he?

13 A. In Gborplay.

14 Q. Do you know how long he had been in Liberia?

12:30:12 15 A. No, I don't know how long he has been there.

16 Q. You said you heard him - heard about his invasion on  
17 Christmas Eve of 1989, correct?

18 A. Yes, I heard it.

19 Q. And you heard that on the radio, correct?

12:30:25 20 A. Definitely, yes.

21 Q. How was Charles Taylor talking on the radio?

22 A. He was talking as any man or any leader or any  
23 revolutionary would talk.

24 Q. Was he on a telephone?

12:30:38 25 A. I don't know, I was not there.

26 Q. Were you listening on the radio?

27 A. Yes, I was listening on the radio.

28 Q. Did they say they were speaking by telephone to  
29 Charles Taylor?

1 A. I don't know what they was speaking on. I heard him  
2 speaking on the radio, so I don't know what he was speaking on.  
3 I was not there. I don't want to speculate.

12:30:57 4 Q. Where did Charles Taylor claim to be when he spoke on the  
5 radio Christmas Eve?

6 A. According to the announcement, he was in Liberia. That's  
7 what he said.

8 Q. Before we leave Burkina Faso completely, you know that  
9 Foday Sankoh had been in Burkina Faso, correct?

12:31:14 10 A. I never knew Foday Sankoh to be in Burkina Faso.

11 Q. You heard Foday Sankoh was in Burkina Faso, correct?

12 A. I never heard Foday Sankoh was in Burkina Faso.

13 Q. Was Dr Manneh in Burkina Faso?

14 A. You are talking about the present, or are you talking about  
12:31:33 15 the past when you say, "Was Dr Manneh in Burkina Faso?"

16 Q. Was he in Burkina Faso when you were there in this period  
17 before you went to Liberia, that is, after leaving Libya before  
18 going to Liberia?

19 A. Yes, he was there. He would come in and out.

12:31:44 20 Q. Sir, when you were talking on Monday you were asked by the  
21 Defence counsel about the structure of the NPFL in Libya. Now  
22 did the NPFL --

23 A. Excuse me, don't get me wrong. I never spoke about the  
24 NPFL structure in Libya. Don't get me wrong.

12:32:27 25 Q. Okay. Let me tell you what I'm asking you about so there's  
26 no confusion. I'll just ask the question now. Did  
27 Charles Taylor - was he the leader of the NPFL in Libya?

28 A. Yes, he was the leader.

29 Q. Who was his deputy?

1 A. I don't know of any deputy to him.

2 Q. Did he have a deputy to your knowledge?

3 A. To my knowledge at the time, no.

4 Q. Did Ali Kabbah have a deputy?

12:32:50 5 A. I don't know Ali Kabbah to have any deputy.

6 Q. Did Dr Manneh had a deputy?

7 A. Dr Manneh had a deputy later on, not during the training.

8 Q. Sir, since Charles Taylor was in and out - you knew that,  
9 correct? He was in and out of Libya?

12:33:05 10 A. I'm not - if you're talking - if you're talking about  
11 numerous occasions, I'm not talking about that. I think I can  
12 remember seeing him there two times. This is what I said in this  
13 Court.

14 Q. Correct.

12:33:14 15 A. Okay.

16 Q. Do you know he was going in and out of Libya or if he was  
17 based there?

18 A. He was not based in Libya.

19 Q. So was someone in charge when Charles Taylor wasn't in  
12:33:24 20 Libya?

21 A. I don't know who was in charge.

22 Q. Do you know Cooper Miller?

23 A. Cooper Miller, yes. I know Cooper Miller.

24 Q. Was Cooper Miller the deputy to Charles Taylor when  
12:33:59 25 Charles Taylor was not there?

26 A. I don't know Cooper Miller to be deputy to Charles Taylor.  
27 I don't know.

28 Q. Is that yes - I mean, he was not; or you don't know?

29 A. I don't know for him to deputy. I don't know him to be

1 deputy for Charles Taylor.

12:35:07 2 Q. If we could have the transcript for 3 November 2009, page  
3 30984. Mr Witness, do you recall hearing about or discussing  
4 with anyone that Charles Taylor in his testimony commented upon  
5 the testimony of Moses Blah in this trial?

6 A. Come in again? I didn't understand that.

7 Q. You said you received some news about this trial and  
8 Charles Taylor's testimony, correct?

9 A. On the radio, yes.

12:35:20 10 Q. If we can go towards the bottom of the page, please. Now,  
11 on this date the Defence counsel was going over some testimony by  
12 Moses Blah and asking Mr Taylor to comment on it, and he was  
13 reading some of Blah's testimony. If we go to line 20, the  
14 Defence counsel said "Jump a few lines" and then he read from the  
12:36:00 15 transcript from Moses Blah and he read the question to Blah:

16 "Q. Did he ever appoint anyone under him to supervise  
17 when he was not there?

18 A. Yes, when he was not there he further said one Cooper  
19 Miller was the commander and Augustine Wright was his  
12:36:15 20 deputy at the time. Whenever he's absent these people are  
21 in full control of the camp.' True?

22 A. That is true."

23 Now, would you agree with that, Mr Witness?

24 A. I said here that I never knew of the structure of the NPFL  
12:36:41 25 when they were trained - when they were training.

26 PRESIDING JUDGE: Can you please hold on. I'm not sure  
27 that Blah is the one who answered, "That is true."

28 MR KOUMJIAN: I misstated that. Thank you, your Honour -  
29 Madam President. That's exactly correct.

1           PRESIDING JUDGE: That was Mr Taylor answering, "That is  
2 true."

3           MR KOUMJIAN:

4           Q.     Mr Witness, if Charles Taylor said, "That is true", do you  
12:37:06 5 agree with that?

6           A.     It could be true. I told this Court that I didn't know of  
7 the NPFL structure while we were in training. I said that. I  
8 never said I knew their structure. The structure that was shown  
9 here was the NPFL in Liberia, so I can't say he is wrong. He  
12:37:24 10 knew his movement; he knew who was his deputy. But at the time I  
11 didn't know. This is what I said in this Court.

12          Q.     Mr Witness, did you ever hear any talk among the Liberians  
13 in Libyan camps about being unhappy with Charles Taylor?

14          A.     I never heard that.

12:37:38 15          Q.     Did you ever hear of any plan to replace Charles Taylor?

16          A.     I never heard that.

17          Q.     Did you ever hear of any plan to assassinate  
18 Charles Taylor?

19          A.     I never heard that.

12:37:48 20          Q.     Do you know if Cooper Miller was arrested by the Libyans or  
21 arrested by someone and detained in Libya?

22          A.     I don't know. I don't know. I'm not aware of it.

23          Q.     When you were in Burkina Faso, did you ever hear if Cooper  
24 Miller was detained there?

12:38:05 25          A.     I never heard of it.

26          Q.     Mr Witness, I'd like now if a piece of paper could be given  
27 to the witness. Sir, you were familiar with the NPFL structure -  
28 command structure in 1991, correct?

29          A.     Yes.

1 Q. In fact, you've commented in your testimony about someone  
2 else's depiction of that command structure, correct?

3 A. Yes.

4 Q. Can you take a piece of paper, please, and take your time  
12:38:48 5 and diagram the command structure of the NPFL in March 1991.

6 Sir, take your time and just tell us when you're finished that.

7 A. This is a rough copy of it.

8 Q. Okay, if that could be put on the overhead, please, so that  
9 we can all see it. Mr Witness, it might be helpful for you to  
12:40:36 10 change seats in case we have questions.

11 Sir, I see you have drawn some lines with no names other  
12 than "Charles G Taylor". I'd ask you to take that back. Is it  
13 correct - you've written to the left "Executive Mansion Guard",  
14 is that correct?

12:41:35 15 A. Yes.

16 Q. Below "Charles G Taylor" you have "battle group commander",  
17 correct?

18 A. Yes.

19 Q. And then below that it looks like you have "battalions"?

12:41:48 20 A. Yes, you have "battalions".

21 Q. Take it back, sir, and write the names for the commanders  
22 and deputy commanders, if you know them, for each of these  
23 positions down to the battalion level of the NPFL.

24 PRESIDING JUDGE: What period exactly?

12:42:04 25 MR KOUMJIAN: March 1991.

26 PRESIDING JUDGE: The witness has put the piece of paper  
27 back.

28 MR KOUMJIAN:

29 Q. Sir, going over the diagram, can you please write on the



1 top left "NPFL command structure March 1991".

2 We see from the top, "Leader Charles G Taylor", and then  
3 off to the left on our screens "Executive Mansion Guard, Michael  
4 Paygar. The battle group commander below Charles G Taylor, Isaac  
12:46:21 5 Musa". Is that correct?

6 A. That's correct.

7 Q. And then you have listed three battalions. Were there only  
8 three battalions in the NPFL in March 1991?

9 A. No, there were not three battalions, but I didn't know the  
12:46:35 10 commanders, so I don't want to put it there. But the battalions  
11 fall under the battle group commander. These are the ones I know  
12 and these are the ones I wrote.

13 Q. How many other battalions are there?

14 A. You have 1st, 2nd, 3rd, 4th, 5th and 6th Battalion.

12:46:51 15 Q. So we're missing in this diagram the 3rd, 4th and 5th  
16 Battalion, correct?

17 A. Yes. I can't remember their commanders at the time anyway.

18 Q. Let's go on the battalions one by one. The 1st Battalion,  
19 the commander was who?

12:47:04 20 A. Edward Mleh.

21 Q. Who was the deputy, if you know?

22 A. I was asked the same question yesterday. I was shown the  
23 person there, but I said I couldn't remember, so I didn't want to  
24 be wrong.

12:47:19 25 Q. Now, sir, where was the first - just to be clear, you don't  
26 remember, is that the answer?

27 A. Deputy, yes. I can't remember the deputy, yeah.

28 Q. Where was the 1st Battalion assigned in March 1991?

29 A. The 1st Battalion was assigned coming towards Grand Bassa

1 into the Monrovia.

2 Q. So can you write a description of the area of assignment  
3 for the 1st Battalion underneath the name of the commander.

4 Let's go to the 2nd Battalion. Anthony M stands for  
12:48:33 5 Anthony Mekunagbe?

6 A. Yeah. I can't really spell Mekunagbe, so I put the M.

7 Q. That's fine. And the 2nd Battalion deputy was Timothy  
8 Mulbah?

9 A. Yes.

12:48:43 10 Q. That battalion was assigned to Lofa?

11 A. Correct.

12 Q. You've skipped three battalions and then we come to the  
13 6th. The commander was Oliver Varney. Is that correct?

14 A. Yes, that's correct.

12:48:55 15 Q. And it was based in Bomi Hills?

16 A. Yes.

17 Q. What was the name of the deputy that you've written?

18 A. Morris Myers. I don't know whether the spelling is  
19 correct.

12:49:09 20 Q. I'm not sure if the record picked it up, but you spelled it  
21 M-Y-E-R-S?

22 A. Yes.

23 Q. Sir, going to the artillery battalion, Joe Tuah. Did Joe  
24 Tuah have a deputy?

12:49:23 25 A. He was a deputy, but I can't remember the name.

26 Q. When did - do you know Martina Johnson?

27 A. Yes, I know Martina Johnson.

28 Q. Did he eventually replace Joe Tuah?

29 A. Martina never replaced Joe Tuah.

1 Q. Was she ever in charge of the artillery of the NPFL?

2 A. Some portion of the artillery of the NPFL, yes, he was  
3 responsible, yes.

4 PRESIDING JUDGE: Mr Koumjian, I'm just inquiring, this  
12:49:48 5 artillery battalion, is it apart from the six battalions already  
6 numbered?

7 THE WITNESS: Yes.

8 PRESIDING JUDGE: So that would be make a 7th Battalion?

9 THE WITNESS: Artillery battalion is a separate battalion  
12:49:58 10 also, yes.

11 MR KOUMJIAN:

12 Q. Before we leave the 6th Battalion, Morris Myers, is he  
13 known by any other name?

14 A. I know Morris Myers, except the soldiers calling him CO  
12:50:15 15 Morris, that's all.

16 Q. Now, the artillery battalion, have you written - what did  
17 you write below that?

18 A. I wrote "rotational". They are rotating. They were not  
19 based - whichever battalion needs some artillery support, they  
12:50:27 20 will call on them and they will go and provide artillery support.

21 Q. Now, sir, going back to the Executive Mansion Guard,  
22 Michael Paygar, who did he report to?

23 A. Michael Paygar report to Mr Taylor.

24 Q. Who was Michael Paygar's deputy?

12:50:50 25 A. At the time his deputy was - Peter Sonkaley was his deputy  
26 at the time.

27 Q. Peter Saklapyay?

28 A. No, Peter Sonkaley.

29 Q. Can you try to spell that? Can you write that below?

1 A. I don't know. That's the best I can do.

2 PRESIDING JUDGE: For the records, the witness has spelled  
3 Peter Sonkaley as S-O-N-K-A-L-E-Y.

4 MR KOUMJIAN: Thank you, Madam President:

12:51:53 5 Q. Now, sir, just going through a few of these people.

6 Michael Paygar, did he remain in the NPFL throughout the war?

7 A. Yes, he remained in the NPFL throughout the war.

8 Q. How about Edward Mlehn?

9 A. Yes, he did.

12:52:06 10 Q. How about Anthony Mekunagbe?

11 A. No.

12 Q. What happened to him?

13 A. He died.

14 Q. When did he die?

12:52:13 15 A. I can't remember exactly, but --

16 Q. What year?

17 A. He was court-martialed and executed.

18 Q. What year was that?

19 A. I think it should be between 19 - I think it should be in

12:52:25 20 1991.

21 Q. What was he executed for?

22 A. He went against his operational - I mean, the SOP of the  
23 NPFL.

24 Q. And what does that mean?

12:52:35 25 A. The SOP means the standard operational procedures.

26 Q. Thank you. How did Anthony Mekunagbe go against the SOP of  
27 the NPFL?

28 A. He did something that was contrary to the SOP.

29 Q. What did you hear he did?

1 A. I was not at court-martial, so actually - but I know it was  
2 something that has to do with something that went against the  
3 operational procedures of the NPFL.

4 Q. Was he accused of conniving with ULIMO?

12:53:02 5 A. Yes, I think that was one.

6 Q. Let's go to the next name, Oliver Varney. Did he stay with  
7 the NPFL throughout?

8 A. Yes, he stayed with the NPFL until the time of his death.

9 Q. When did he die?

12:53:21 10 A. He also died in 1991.

11 Q. And what happened to him?

12 A. Under the same circumstances.

13 Q. He was accused of conniving with ULIMO and executed?

14 A. He was not executed summarily. He went through

12:53:34 15 court-martial.

16 Q. Where was he executed?

17 A. I don't know where he was executed, but the court-martial,  
18 you know, ruled that he should be executed and he was executed.

19 Q. Where was Anthony Mekunagbe? Where did he die?

12:53:48 20 A. I don't know where he died. I don't know where they were  
21 executed.

22 Q. Before we go to the - well, the artillery battalion, Joe  
23 Tuah, did he remain with the NPFL throughout?

24 A. Definitely, yes.

12:54:02 25 Q. And he in fact was very close to Charles Taylor throughout,  
26 including the presidency of Charles Taylor, correct?

27 A. That's correct.

28 Q. Charles Taylor used to send him on the arms missions to  
29 obtain arms, correct?

1 A. I don't know that. That is your version. I don't know  
2 what you're talking about.

3 Q. Sir, the 2nd, 3rd and 4th Battalion, I don't know if  
4 there's any space below, I guess not, on your diagram, can you on  
12:54:36 5 the right-hand side just write "2nd, 3rd, and 4th Battalion" with  
6 a question mark next to it if you don't know the commander or  
7 deputy commander and then list their areas of assignment.

8 A. I don't know. This is the reason why I didn't write it,  
9 because I was not, how do you call it - I didn't know their areas  
12:54:49 10 of assignment. I didn't know their commanders. This is why I  
11 didn't write it.

12 Q. Okay. Thank you.

13 A. So I don't think it would serve any purpose if I just draw  
14 a line like that.

12:54:55 15 Q. Thank you. So just write "2nd, 3rd and 4th Battalions"  
16 with question marks after each - excuse me, "3rd, 4th and 5th  
17 Battalions". My mistake.

18 PRESIDING JUDGE: The question marks --

19 MR KOUMJIAN:

12:55:12 20 Q. Indicating that you don't know the names of the commanders,  
21 the deputy commander or area of operations.

22 PRESIDING JUDGE: Mr Koumjian, I hope that months from now  
23 everybody will understand what those question marks are. Isn't  
24 there a better way to put something down on a document?

12:55:41 25 MR KOUMJIAN: Yes, thank you:

26 Q. Sir, can you write - why don't you put an asterisk next to  
27 each of those, sir, above each of the 3rd, 4th and 5th - can you  
28 do that? Do you know what I mean?

29 A. Above them?

1 Q. Yes. And then perhaps on the top right you can put an  
2 asterisk and tell me if you believe it's fair. You can write,  
3 "Witness does not know names of commanders or area of operation".  
4 Mr Witness, did Isaac Musa have a deputy?

12:57:14 5 A. Yes, Isaac Musa had a deputy.

6 Q. Who was that?

7 A. His deputy was - during the - at the beginning of the war?

8 Q. March '91.

9 A. March '91 it was John Teah.

12:57:27 10 Q. Can you write that, please. Did John Teah remain with the  
11 NPFL throughout?

12 A. Yes, John Teah remained with the NPFL throughout.

13 Q. Was Tiagen Wantee ever deputy to Isaac Musa?

14 A. Yes, because - this is why I asked you. Because at the  
12:57:51 15 beginning in 1990 going towards some part of 1991, Tiagen Wantee  
16 was the deputy to Isaac Musa.

17 Q. What was his position in March 1991?

18 A. Tiagen Wantee, no, I don't know what was his position.  
19 During the time of the NPRAG he was appointed as managing  
12:58:11 20 director of LPMC, that's Liberia Produce Marketing Corporation,  
21 yes.

22 Q. Where was that?

23 A. It was in Gbarnga. They had their headquarters in Gbarnga.  
24 LPMC had their headquarters in Gbarnga.

12:58:28 25 Q. What kind of an organisation was that?

26 A. That was an organisation that is responsible to import  
27 rice, to buy and sell cocoa and coffee.

28 Q. Was most of that trading done with Guinea?

29 A. At individual levels, yes.

1 Q. Sir, where was the 2nd Battalion based in Lofa - you said  
2 Lofa, but in March 1991 what was the headquarters?

3 A. The headquarters was in Voinjama.

4 Q. What was the headquarters of the 6th Battalion?

12:59:00 5 A. In Tubmanburg.

6 Q. I don't know if there's space on the diagram to draw those  
7 in - write those in.

8 A. Excuse me?

9 Q. Sir, under "Lofa" can you just put in parenthesis the  
12:59:32 10 headquarters in Lofa. The artillery battalion was based in  
11 Gbarnga at this time?

12 A. Correct.

13 Q. And the 1st Battalion, you said Grand Bassa. Where was the  
14 headquarters?

12:59:52 15 A. No, I'm saying their route was coming from Grand Bassa,  
16 Margibi County towards Monrovia. I think at this time they  
17 should be at - their headquarters was at Camp Schefflein. I  
18 don't know whether somebody can help me with the spelling.

19 Q. We all understand that. It's on the record. Thank you.

13:00:15 20 Now, sir, the Executive Mansion Guard, that was based in Gbarnga?

21 A. That's correct.

22 Q. Can you write that? Okay, thank you very much. You can  
23 put that away.

24 I'd perhaps ask the witness to sign and date this in the  
13:00:38 25 convention that the Court has adopted --

26 PRESIDING JUDGE: Sorry, could I see the name of Peter --

27 THE WITNESS: Sonkal ey.

28 PRESIDING JUDGE: What did you say he was?

29 THE WITNESS: He was deputy to Michael Paygar.



1           PRESIDING JUDGE: Why don't you write the word "deputy"  
2 there?

3           THE WITNESS: I didn't write it? Sorry.

4           MR KOUMJIAN:

13:01:01 5       Q.     Sir, could you sign and date this. Today's date is 26  
6 February 2010.

7           Your Honour, Madam President, could this be given an MFI  
8 number, this diagram drawn by the witness?

9           PRESIDING JUDGE: The diagram headed "NPFL command  
13:01:35 10 structure, March 1991" as drawn by Yanks Smythe is MFI-430.

11           Mr Koumjian, you did refer to a photo earlier. I don't  
12 know what you want to do, whether you want to discard it?

13           MR KOUMJIAN: May that be given an MFI number, please, your  
14 Honour? That was the photograph where the witness discussed the  
13:02:04 15 silver briefcase Flyaway radio.

16           PRESIDING JUDGE: That was the photo in tab 7 entitled  
17 "Charles Taylor speaks to troops in Robertsfield on 21 July  
18 1990". That photo is marked MFI-431.

19           MR KOUMJIAN:

13:02:55 20       Q.     Mr Witness, you've talked about - in your testimony about  
21 meeting Foday Sankoh in Libya and in Liberia up - from the time  
22 in Libya up to after Lome you had had various occasions to meet  
23 Foday Sankoh, correct?

24       A.     Which various occasions are you referring to?

13:03:20 25       Q.     All the occasions that you've talked about where you saw  
26 Foday Sankoh?

27       A.     Yes. I said yes.

28       Q.     And you saw him in Gbarnga, correct?

29       A.     Yes, between August 1991 and 1992.

1 Q. Between August 1991 and August 1992?

2 A. No, August 1991 to, I think, May, June 1992.

3 Q. Sir, how is it that you have such a good recollection of  
4 this time period; that you saw Foday Sankoh exactly in this time  
13:03:51 5 period 19 years ago?

6 A. Yeah, but I'm a sensible person. I can remember some  
7 things and forget some things. I have my five senses correct. I  
8 don't have to remember to everything. But there are some things  
9 that I recollect good, I can remember them. So that's normal of  
13:04:08 10 every human being.

11 Q. Mr Witness, how would you describe the personality of Foday  
12 Sankoh?

13 A. When you say "personality of Foday Sankoh", what do you  
14 mean? He is a man and I think he is - you know, he is a  
13:04:20 15 responsible man.

16 Q. He was an extroverted man? He was a friendly person?

17 A. I never interacted with Foday Sankoh too much. But when I  
18 saw him, the occasions that I saw him he was friendly, yes.

19 Q. Did he strike you in your conversations as a highly  
13:04:34 20 intelligent man?

21 A. I don't know what you're talking about, but I don't have  
22 long conversation with Foday Sankoh for me to know whether he is  
23 intelligent or not. But to me he is a human being and 'she  
24 intelligent.

13:04:48 25 Q. How would you compare him to Charles Taylor?

26 A. Charles Taylor is more intelligent than Foday Sankoh,  
27 definitely.

28 Q. Who was more educated?

29 A. Charles Taylor is more educated, as far as I know.

1 Q. In Libya were the two respected equally?

2 A. No, they were not respected equally because Foday Sankoh  
3 was not a leader.

4 Q. So who was the more respected in Libya?

13:05:07 5 A. Charles Taylor was more respected in Libya.

6 Q. And did that last - did that respect for Charles Taylor  
7 being greater than Foday Sankoh, did that continue after Libya?

8 A. Excuse me?

9 Q. That situation where Charles Taylor was respected more than  
13:05:24 10 Foday Sankoh, did that continue after Libya? When you were in  
11 Gbarnga, for example, who was more respected?

12 A. We respect our leader, and I'm sure - I mean, Foday Sankoh,  
13 you know, was respected by his men too.

14 Q. Did you ever hear Foday Sankoh address Charles Taylor -  
13:05:46 15 talk to Charles Taylor?

16 A. I never heard Foday Sankoh talk to - address  
17 Charles Taylor.

18 Q. You knew Foday Sankoh well, correct?

19 A. If you say "well", I don't know what you mean. I said I  
13:06:03 20 met Foday Sankoh on several occasions, but not well to say I'm a  
21 friend or something, no.

22 Q. Would you say that you knew Foday Sankoh well?

23 A. No, I would not say I knew him well.

24 Q. Mr Witness, you know that Charles Taylor knew Foday Sankoh,  
13:06:12 25 correct?

26 A. I knew Charles Taylor knew Foday Sankoh between 1991 and  
27 1992 and up to the time he was facilitator in the peace process.

28 Q. Did Charles Taylor, to your knowledge, know Foday Sankoh  
29 before that?

1 A. No, not to my knowledge.

2 Q. You admit, correct, that Charles Taylor could very well  
3 have met Foday Sankoh in Libya, correct?

13:06:38 4 A. I don't know if Charles Taylor has ever met Foday Sankoh in  
5 Libya.

6 Q. You wouldn't know that, correct?

7 A. I don't know that.

8 Q. Because you only saw Charles Taylor once or twice, correct?

9 A. I don't know that Charles Taylor met Foday Sankoh in Libya.

13:06:48 10 Q. And you only saw Charles Taylor once or twice. You don't  
11 know who he - let me slow down. You don't know who  
12 Charles Taylor knew, met, and didn't meet in Libya; isn't that  
13 true?

14 A. From the time I met him I didn't know who he met, who he  
13:07:06 15 never met. I don't know.

16 Q. When did the revolution begin in Liberia?

17 A. When you say "revolution", what do you mean by  
18 "revolution"?

19 Q. What would you understand it to mean?

13:07:17 20 A. I don't know. You ask your questions. You asked me  
21 specifically to be specific.

22 Q. When did the revolution --

23 PRESIDING JUDGE: Mr Koumjian, do ask questions in a manner  
24 that can be understood.

13:07:27 25 MR KOUMJIAN: I think your Honours will understand my  
26 purpose. Your Honours, could the witness - could we please play  
27 now --

28 PRESIDING JUDGE: Are you abandoning the question that you  
29 were asked to repeat?

1 MR KOUMJIAN: Yes, I'm abandoning the question for reasons  
2 that will become apparent. MFI-320 is a short tape with a  
3 transcript, and we notified the Court Officer last night we would  
4 use it:

13:08:24 5 Q. Mr Witness, was the invasion of Liberia called by the NPFL  
6 a revolution?

7 A. Yes, it was called a revolution.

8 Q. Mr Witness, I'd ask you - when it's ready, the court  
9 officer will tell me. She says it is - to listen to this tape.

13:08:46 10 Please concentrate, because it is difficult. There is also a  
11 transcript - and I don't know if that's before the witness - that  
12 you can follow.

13 [Audiotape played to the Court]

14 MR KOUMJIAN:

13:10:05 15 Q. Mr Witness, did you recognise the voice of the person being  
16 interviewed, the male voice?

17 A. Yes.

18 Q. And whose voice was that?

19 A. It was Charles Taylor's voice.

13:10:16 20 Q. Did you ever recall hearing this radio broadcast?

21 A. No, I never heard this radio broadcast before.

22 Q. Now, sir, when Charles Taylor in that broadcast - perhaps  
23 is the transcript still on the screen?

24 PRESIDING JUDGE: Could you please return the transcript.

13:10:33 25 Because a lot of what was said we couldn't hear; we can only  
26 refer to the transcript.

27 MR KOUMJIAN:

28 Q. Just so it's clear, Mr Witness, just above where it says  
29 "Harper" in the middle of the page on the screen now, three lines

1 up, the sentence begins, "Look, when the war started in Sierra  
2 Leone", that is when the broadcast begins. So perhaps we could  
3 play it again and follow the transcript from that point where it  
4 says, "Look, when the war started in Sierra Leone ..." Could the  
13:11:42 5 radio broadcast be played again.

6 [Audiotape played to the Court]

7 Sir, towards the end of what was broadcast, do you recall  
8 hearing - and I'm reading the last paragraph, the middle of the  
9 third line of that paragraph - Charles Taylor say, "After he was  
13:13:08 10 overthrown," referring to Kabbah, "it is known by everyone that I  
11 have been friendly with Foday Sankoh for many years before the  
12 revolution." Based on your experience in Liberia with the NPFL,  
13 with Charles Taylor, when was the revolution?

14 A. Which revolution are you referring to? I don't know which  
13:13:25 15 revolution you're referring to.

16 Q. Well, that's my question. Based on your knowledge of  
17 Charles Taylor and the NPFL, when Charles Taylor here refers to a  
18 revolution, which revolution is he talking about?

19 A. I don't know which revolution he is talking about.

13:13:36 20 Q. Do you think he's talking about the American Revolution?

21 A. I can't speculate. Tell me the revolution he's talking  
22 about before I can answer the question. I can't speculate which  
23 revolution he was talking about.

24 Q. Well, sir, do you think he's talking about the Liberian  
13:13:49 25 revolution?

26 A. I don't know which revolution he was talking about.

27 PRESIDING JUDGE: Mr Koumjian, to be fair to this witness,  
28 we've all heard a very small excerpt of this interview, and  
29 frankly speaking, looking at the transcript, it could be either

1 the revolution in Sierra Leone or some other revolution. Even I  
2 can't tell what revolution, if any, is being referred to, because  
3 he does speak of the overthrow of Kabbah. It could be mean the  
4 Sierra Leone revolution; I don't know. So, really, to be fair to  
13:14:23 5 the witness, you cannot ask a question like that and ask him to  
6 speculate.

7 MR KOUMJIAN: Very well. I'll move on to another subject,  
8 your Honours:

9 Q. Sir, when you got to NPFL territory, what nationalities,  
13:14:51 10 from the time you arrived until the end of the first war in  
11 Liberia, what nationalities were fighting with the NPFL that you  
12 were aware of?

13 A. I was only aware of Liberians fighting with the NPFL.

14 MR ANYAH: Madam President, the reference to the end of the  
13:15:08 15 first war in Liberia, I wonder if counsel assumes the witness  
16 will distinguish between the wars with LURD, MODEL, the wars with  
17 the INPFL, the AFL. The question, in my view, is vague.

18 MR KOUMJIAN: Your Honour, I think it's a fair enough  
19 comment and I'll clarify it:

13:15:34 20 Q. Sir, all the wars that you were - when you were in Liberia,  
21 let's deal with those, all the wars, meaning the wars before  
22 Charles Taylor's presidency, from Christmas Eve 1989 all the way  
23 until August of 2003 when he left, all of those wars, what  
24 nationalities were fighting on behalf of the NPFL or when he was  
13:15:56 25 President Charles Taylor's various armed forces?

26 A. I know - I knew of only Liberians fighting for the NPFL and  
27 I knew of only Liberians fighting for the Liberian government.

28 Q. Sir, you're a Gambian.

29 A. Yes, I'm a Gambian.

1 Q. You came there with brother Gambians, correct?

2 A. Yes.

3 Q. You weren't, you said, made a Liberian until 1998, correct?

4 A. Yes.

13:16:22 5 Q. So you were not Liberian when you were fighting with the  
6 NPFL, correct?

7 A. It doesn't mean that, but I was not fighting. I was not  
8 fighting at the front.

9 Q. Okay. You never were at the front?

13:16:32 10 A. I was not at the front.

11 Q. Because you were a bodyguard of Charles Taylor, correct?

12 A. Whatever you take it to be.

13 Q. Well, that's a question.

14 A. Yes.

13:16:39 15 Q. As a bodyguard for Charles Taylor, he stayed away from the  
16 front. Is that right?

17 A. Well, if you say so, that's it.

18 Q. No. You're the witness, sir, and you were his bodyguard.

19 Answer the question.

13:16:48 20 A. Yes, yes, yes. I was bodyguard to Charles Taylor, yes.

21 Q. Did Charles Taylor stay away from the fighting?

22 A. He was not in the - he was not fighting.

23 Q. Were Senegalese present in the NPFL?

24 A. Beside the two - beside the ones I mentioned, I don't

13:17:11 25 know - I never know of any.

26 Q. In the SSS, were there Gambians?

27 A. Yes.

28 Q. Were there Gambians in other positions in the NPFL?

29 A. Excuse me, excuse me. The Gambians that were in Liberia,



1 everybody eventually became Liberian.

2 Q. When was that?

3 A. That was the same time I became a Liberian.

4 Q. So they all had citizen certificates. Is that correct?

13:17:36 5 A. They were all Liberians and they went through the process  
6 that I went through, as far as I know.

7 Q. So they all were foreigners in Liberia up until 1998. Is  
8 that correct?

9 A. You can say that.

13:17:47 10 Q. Were the Ghanaians, people from Ghana, in the NPFL or the  
11 SSS?

12 A. I knew - the only Ghanaian I knew was Peter Some and he was  
13 aide-de-camp to President Taylor.

14 Q. Were there Sierra Leoneans?

13:18:06 15 A. I never came across any Sierra Leonean.

16 Q. It's a neighbouring country, correct?

17 A. Yes, it's a neighbouring country.

18 Q. And there were many Sierra Leonean people living in Liberia  
19 during those years, correct?

13:18:24 20 A. That's correct, yes.

21 Q. You never came across any Sierra Leoneans in the NPFL?

22 A. I never came across any Sierra Leonean within the ranks of  
23 the NPFL.

24 Q. Were you aware of a unit in the SSS that Benjamin Yeaten  
13:18:35 25 had in the years, let's say, 2000, '99 to 2000, before you left  
26 to Libya, people called the Yapl an Unit?

27 A. I never heard of that word.

28 Q. Benjamin Yeaten used to have a lot of Sierra Leonean  
29 bodyguards with him, correct?

1 A. Are you saying that? I'm not saying that. I've never seen  
2 Benjamin with any Sierra Leonean bodyguard.

3 PRESIDING JUDGE: Mr Koumjian, the what unit?

4 MR KOUMJIAN: It's on the record, spelled Y-A-P-L-A-N;

13:19:07 5 Yapan. That was the phonetic spelling of the witness who gave  
6 it, which was - I believe it's 579's testimony:

7 Q. Sir, did you know Nyalay?

8 A. I don't know anybody by the name Nyalay.

9 Q. Were there Ivorians in the NPFL?

13:19:31 10 A. I don't know of any Ivorian in the NPFL.

11 Q. Were there Ivorians in the SSS?

12 A. I don't know any Ivorian in the SSS.

13 Q. Sir, you were a member of the SSS up until 2000. Is that  
14 correct?

13:19:45 15 A. That's correct.

16 Q. You would know what nationalities were in the SSS, correct?

17 A. Yes, I would know.

18 Q. How many total personnel did the SSS have at its height  
19 when you were --

13:19:58 20 A. I can't remember the total amount, the total number of SSS.  
21 I can't remember the total.

22 Q. Well, there were Ivorians, weren't there, in the SSS?

23 A. You are saying so. I never say so. I never saw any  
24 Ivorian serving in the SSS.

13:20:14 25 Q. Were any Ivorians or members - were any SSS members sent by  
26 Charles Taylor to help Robert Guei in the Ivory Coast at the time  
27 of his revolution or coup at Christmas or Christmas Eve 1999?

28 A. I'm not aware of Charles Taylor sending anybody to the  
29 Ivory Coast.

1 Q. You're not aware of any SSS going to the Ivory Coast?

2 A. I'm not aware of any SSS going to Ivory Coast.

3 Q. Were there any Ivorians in the SSS, to your knowledge?

4 A. To my knowledge, there were no Ivorians in the SSS.

13:20:44 5 Q. Could we have the transcript, please, for 27 January this  
6 year, page 34266. This is from the testimony of Mr Taylor. The  
7 bottom of the page, please, starting at line 21, Mr Taylor was  
8 asked:

9 "Q. Let's make sure we have a chance to deal with some of  
13:22:13 10 this information, Mr Taylor. First: When General Guei  
11 told the panel that shortly after the coup d'etat,  
12 Christmas Eve 1999, he asked several countries, including  
13 yours, for ammunition and weapons, was he telling the  
14 truth? Do you recall that?

13:22:54 15 A. General Guei, yes. General Guei did ask for  
16 assistance, yes.

17 Q. And when it says that you sent - that he told the panel  
18 that you sent small quantities of ammunition and light  
19 weapons, did you send small quantities of ammunition and  
13:23:16 20 light weapons to General Guei?

21 A. Well, yes, but I don't think the panel is fooled about  
22 this. There were personnel, and those personnel carry  
23 small ammunition and weapons. We sent the - some of the  
24 Ivorians that were in Liberia that even served as his  
13:23:41 25 personal bodyguards, and they carried the small weapons and  
26 ammunition, yes.

27 Q. When you say the Ivorians in Liberia, explain who you  
28 mean.

29 A. Oh, they were trained Libe - Ivorians that were living

1 in Liberia during the time of my presidency. We packed  
2 some of them up and went, and General Guei wanted  
3 protection, so we let them go back. When they were going,  
4 they did carry their physical arms with them.

13:24:21 5 Q. Immediately before you sent them to General Robert  
6 Guei, were they in any military or paramilitary force in  
7 Liberia?

8 A. They were Secret Service personnel for his protection.

9 Q. SSS personnel in your country?

13:24:56 10 A. That is correct."

11 So, Mr Witness, I ask you again, were there Ivorians in the  
12 SSS?

13 A. I'm not aware of them. I can't say they were not there,  
14 but I'm aware of them and this is how I answer my question.

13:25:09 15 Q. Were you aware of any SSS personnel being sent to the Ivory  
16 Coast?

17 A. I was not aware of any SS being sent there.

18 Q. Mr Witness, I want to ask you a little bit about radios.  
19 You were a radio operator for Mr Taylor what time period?

13:25:34 20 A. I stated that from 1990 to 1993.

21 Q. Could the witness be given a blank piece of paper, please.  
22 During the period, Mr Witness, at the beginning of 1992, so let's  
23 say January 1, 1992, first, can you just tell me and answer this  
24 question, where did the NPFL have radios?

13:26:06 25 A. What time frame are you talking about?

26 Q. January 1, 1992.

27 A. January 1, 1992?

28 Q. Yes.

29 A. Where NPFL had radios?

1 Q. Yes.

2 A. NPFL had radios in all their controlled areas.

3 Q. Well, does that mean that every unit of five soldiers had a  
4 radio?

13:26:28 5 A. Never. I said control areas. Headquarters.

6 Q. Thank you. Perhaps then can you list the headquarters  
7 where there were radios?

8 MR ANYAH: Madam President, perhaps for purposes of  
9 efficiency, there is a distinction between radios and radio  
10 stations. So now if we have the witness radios, which in some  
11 respects individual soldiers can walk around with radios,  
12 vis-a-vis radio base stations, we may run into difficulty as to  
13 the utility of this diagram the witness is being asked to draw.

14 PRESIDING JUDGE: The witness has been asked to draw - or  
13:27:26 15 to list, actually - list the areas where the NPFL had control -  
16 radios in their controlled areas. Now, he hasn't expressed any  
17 difficulty in doing that.

18 THE WITNESS: Because I understand his question to be  
19 communication radios. Is that right?

13:27:52 20 MR KOUMJIAN:

21 Q. Mr Witness, let's see what you have written.

22 A. I was just waiting.

23 Q. Sir, you're the radio operator. Yes, by "radio" I mean a  
24 radio that you communicate between other radios, correct?

13:28:04 25 A. Yes, correct.

26 Q. Can that please be put on the --

27 A. I have not finished.

28 Q. I see we're almost out of time. Okay, please finish.

29 A. I have not finished.

1 PRESIDING JUDGE: I'm informed that we have two minutes  
2 left on the tape.

3 THE WITNESS: Just to name a few, these are the - some that  
4 I could remember.

13:29:36

5 MR KOUMJIAN:

6 Q. Mr Witness, we're almost out of tape so let's put this on  
7 the screen. But while that's being broadcast, what are some of  
8 the --

13:29:52

9 PRESIDING JUDGE: Could the names at least be read on to  
10 the record by the witness?

11 MR KOUMJIAN: Yes.

12 Q. Mr Witness, could you please read the names of the stations  
13 - of the places that you wrote down that had radios?

13:30:03

14 A. I listed Gbarnga; I listed Loguato; I listed Ganta; I  
15 listed Harper; I listed Grand Cess; I listed Zwedru; I listed  
16 Sanniquellie; I listed Buchanan; I listed Kakata.

17 MR KOUMJIAN: Your Honour, just with the time running out,  
18 may this be marked for identification?

19 Q. Mr Witness, perhaps before that --

13:30:23

20 PRESIDING JUDGE: There is no explanation of what this list  
21 is; there is no signature.

22 MR KOUMJIAN: I'm just worried about the time, but I'm  
23 happy to do that.

13:30:39

24 PRESIDING JUDGE: I cannot mark for identification an  
25 incomplete document. But if you wish, the Court Manager can take  
26 it into custody.

27 MR KOUMJIAN: Thank you.

28 PRESIDING JUDGE: The tape has run out. I'm just going to  
29 caution the witness.

1 Mr Witness, today is Friday and the proceedings will  
2 adjourn to Monday at 9.30, and in the meantime you are not to  
3 discuss your evidence.

4 THE WITNESS: Thank you, your Honour. Definitely yesterday  
13:31:01 5 I have forgotten to ask you - because today is a very important  
6 Muslim holiday. I would have loved to ask you to excuse me  
7 today, but yesterday I didn't tell you, so I took it not to be an  
8 excuse. But I would have loved to, you know, have a day off for  
9 the birth of the Prophet.

13:31:19 10 PRESIDING JUDGE: We do appreciate that you've taken time  
11 out of your important public holiday. We do appreciate that.  
12 Unfortunately for us, it's a sitting Court day. So we adjourn  
13 the proceedings to Monday at 9.30.

14 [Whereupon the hearing adjourned at 1.31 p.m.  
15 to be reconvened on Monday, 1 March 2010 at  
16 9.30 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

YANKS SMYTHE	36121
CROSS-EXAMINATION BY MR KOUJIAN	36121