



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

WEDNESDAY, 22 JULY 2009
9.30 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr William Romans
Ms Sidney Thompson

For the Registry:

Ms Rachel Irura
Mr Benedict Williams

For the Prosecution:

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

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Morris Anyah
Mr Silas Chekera

1 Wednesday, 22 July 2009

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.30 a.m.]

09:26:05 5 PRESIDING JUDGE: Good morning. We will take appearances
6 first, please.

7 MS HOLLIS: Good morning, Mr President, your Honours,
8 opposing counsel. This morning for the Prosecution, Mohamed A
9 Bangura, Christopher Santora, Maja Dimitrova and myself Brenda J
09:32:03 10 Hollis.

11 PRESIDING JUDGE: Thank you. Yes, Mr Griffiths.

12 MR GRIFFITHS: Good morning, Mr President, your Honours,
13 counsel opposite. For the Defence today, myself Courtenay
14 Griffiths, assisted by my learned friends Mr Morris Anyah,
09:32:17 15 Mr Silas Chekera and Mr Liam Loughlin.

16 PRESIDING JUDGE: Yes, go ahead, Mr Griffiths. Just before
17 you do I will remind Mr Taylor that you are still on your
18 declaration to tell the truth.

19 DANKPANNAH DR CHARLES GHANKAY TAYLOR:

20 [On former affirmation]

21 EXAMINATION-IN-CHIEF BY MR GRIFFITHS: [Continued]

22 Q. Mr Taylor, yesterday when we rose for the day you had been
23 dealing with various locations on a map of Liberia where you tell
24 us that UNOMIL had been deployed. Do you recall that?

09:32:57 25 A. Yes, I do.

26 Q. I would like you now, please, to be shown our exhibit D-25.
27 Now, Mr Taylor, have you seen this map before?

28 A. Yes.

29 Q. When was that?

1 A. I saw this map many years ago, but there is a little
2 distinction here that I may have to make, so as we go through I
3 would explain to the Bench the little distinction. But this map
4 is an old map. I have seen it many, many times even before -
09:34:30 5 while I was still in Liberia.

6 Q. And you see it is headed "Liberia Demobilisation Sites" and
7 it bears the logo of the World Food Programme. Now, help us,
8 Mr Taylor. You see the dates at the top 1996 to 1997, but what
9 is being depicted here on this map?

09:34:59 10 A. Well, let me just clarify for the judges. In my testimony
11 on yesterday I spoke about 1994 and about six areas, but really I
12 said could be brought into five because the United Nations and
13 ECOMOG are deployed jointly in the city of Gbarnga. Now we must
14 note here that this is a disarmament and demobilisation map some
09:35:36 15 years later in '96 which shows the entire country and this is
16 that expansion that I spoke about on yesterday whereby the time
17 we have agreed to the amendment adjustments to the Cotonou
18 Agreement we finally come up with an agreement for total
19 deployment throughout the country. So this map now is a
09:36:03 20 demobilisation and disarmament map.

21 I want to make that distinction between this map that is
22 showing '96/'97 which is the final disarmament before elections
23 and the beginning of the programme in 1994 before I finally moved
24 to Monrovia in '95.

09:36:28 25 Q. Very well. And so how do the various locations depicted on
26 this map compare with the locations you told us about yesterday
27 in terms of UNOMIL deployment?

28 A. Well, the second explanation that I gave on yesterday is in
29 sync with what you see here. I did take the Court through the

1 total deployment and this is what we see here.

2 Q. All right. Okay, I think we can dispense with that map
3 now. I am grateful. Now, Mr Taylor, yesterday your testimony
4 had covered up to the end of 1994. Do you agree?

09:37:48 5 A. Yes, I agree.

6 Q. Were there any other events in 1994 that you wanted to
7 assist us with?

8 A. Well, I think one in particular I think will be important
9 because it will begin to set the stage for probably what is going
09:38:10 10 to come out later. In 1994, late 1994, for the first time the
11 United Nations Secretary-General sent --

12 Q. Who was that?

13 A. '94, it has got to be - I am not too sure whether it is
14 Annan or Boutros-Ghali, I have just forgotten, but it is either
09:38:37 15 Annan or Boutros-Ghali. I may have to reflect on that. A
16 special representative was sent to Liberia. This was about the
17 first time this was done to give the Secretary-General an
18 opportunity to have a hands-on approach on what was going on.
19 His name was Trevor, that's T-R-E-V-O-R, Trevor Gordon-Somers.
09:39:03 20 That's G-O-R-D-O-N S-O-M-E-R-S. I think the last name there is a
21 hyphen between it, so it could be one name Gordon-Somers. That's
22 the way it was pronounced. And he for the first time visited all
23 areas and there was a Secretary-General's report issued in 1994,
24 round about August/September, that I think would be important to
09:39:33 25 the Court because that Secretary-General's report gave a complete
26 outline of the situation on the ground in Liberia during that
27 particular time that will give the Court a clearer understanding
28 and is really in sync with what I have been saying here about the
29 process.

1 There is another thing that I think we lost in the process
2 is that in - during this time in late 1994 the chairman of ECOWAS
3 is Flight-Lieutenant Jerry Rawlings and it is that - remember I
4 told the Court that we were at Akosombo when my headquarters were
09:40:27 5 - I was attacked in the 1994. So those are two very important
6 events.

7 The third thing that we must understand that even I can say
8 made the peace more meaningful, the decision at Akosombo was one
9 for the first time that gave the ECOMOG forces peace enforcement
09:40:50 10 powers, so I think that is significant because what follows over
11 the years into my being elected as President later in 1997, all
12 of the actions are informed by this decision in September of 1994
13 at Akosombo that gave the ECOMOG forces peace enforcement rights.

14 Now, what is peace enforcement I'm sure - let me to the
09:41:28 15 best of my knowledge of what it means. It meant that any faction
16 disobeying the rules of engagement that had been sent, that
17 ECOMOG had the right to use force. So I think those three events
18 - and if we went through the Secretary-General's report, we would
19 set the entire stage of what happened during that period.

09:41:54 20 Q. Have you seen that report, Mr Taylor?

21 A. Oh, yes, I have read the report.

22 Q. And you say it dates from 1994?

23 A. That is correct.

24 MR GRIFFITHS: I wonder if we could have placed before the
09:42:05 25 witness, please, from the additional documents for week 30, the
26 document behind tab 2:

27 Q. Take a look behind tab 2, please, Mr Taylor. Is this the
28 document, Mr Taylor?

29 A. Yes, this is the document.

1 Q. Now I would like you to take the initiative, please,
2 Mr Taylor, and help us with the passages you feel would be of
3 assistance to the judges?

4 A. Okay. The most important here that I referred to would be
09:43:55 5 the - let me find the section dealing with peace enforcement.
6 Well, let's - if we go over to page 6 and we look at 6A number
7 23, that spells out the report from the Secretary-General dealing
8 with the attack on my headquarters while I am at the Akosombo
9 discussions. That is made very clear there.

09:44:40 10 Q. Well, let's not go too fast, Mr Taylor. We see that that
11 section to which you have directed our attention, "Situation on
12 the ground," paragraph 22 provides, doesn't it, "As indicated in
13 my report of the 26th of August, in July 1994 a coalition of
14 forces was formed by AFL, LPC and ULIMO-Johnson". Pause there.

09:45:10 15 AFL, who is that?

16 A. Armed Forces of Liberia.

17 Q. LPC?

18 A. That is the Liberia Peace Council.

19 Q. I don't think we have been introduced to that organisation
09:45:22 20 yet, so help us. What formed that organisation?

21 A. That organisation was formed by Dr George Boley. Actually,
22 the LPC was just a smart breakup of the Armed Forces of Liberia
23 personnel that just fragmented themselves into little factions so
24 as to enhance their own capacity on the ground. So I can almost
09:46:06 25 say 90 per cent of the LPC, the Liberian Peace Council, were all
26 members of the Armed Forces of Liberia.

27 Q. Okay. And then ULIMO-Johnson, what is that?

28 A. The ULIMO faction broke up into two factions: One was
29 headed by Alhaji Kromah that eventually settled into Lofa; the

1 other faction was headed by a gentleman called Roosevelt Johnson,
2 who is also Krahn Grebo, and that part of ULIMO was in part
3 people that they had trained, but for the most part also are
4 members of the Armed Forces of Liberia. So what we have here, it
09:47:09 5 appears that at that time they took it to be a tactical move
6 because we are talking about transitional governments coming into
7 being. If you break up and you claim that you are a faction, you
8 are entitled to certain positions once the government is formed.
9 So this is a tactical move, and they all split up into fighting
09:47:30 10 forces.

11 Q. Now it continues: "Reports indicated that the principal
12 objective of the coalition, supported by NPFL breakaway ministers
13 in the Liberian National Transitional Government". Now what is
14 that about, NPFL breakaway ministers?

09:47:49 15 A. At this particular time a few of our ministers had parted
16 ways with us and had gone into Monrovia and formed their own
17 group - a fighting group also.

18 Q. And who were they?

19 A. Those that broke away at the time was the late Samuel
09:48:19 20 Dokie. Dokie is spelt D-O-K-I-E. Another was our former Defence
21 Minister Thomas Womeiyu, and that is spelt in the records
22 already.

23 Q. Then it goes on: "Was to defeat Charles Taylor and capture
24 Gbarnga. Around mid-August, troops began to congregate in the
09:48:44 25 Bong Mines and Kakata area, planning a move against Gbarnga.
26 There are reports that some elements of ECOMOG, as well as some
27 prominent Liberians, may have supported those efforts.

28 Charles Taylor's departure from Liberia on 6[sic] September
29 to attend the Akosombo meeting exacerbated the breakdown in NPFL

1 command, thereby providing an opportunity for Alhaji Kromah's
2 wing of ULIMO to attack Gbarnga and take control of Taylor's
3 headquarters on 6 September. At this point, on 9 September, 43
4 unarmed United Nations military observers and six governmental
09:49:31 5 organisation personnel were detained by the NPFL". do you know
6 about that, Mr Taylor?

7 A. Yes, I do.

8 Q. And what was the reason for that?

9 A. Well, I am not forgetting I am already in Akosombo. We
09:49:51 10 have gone through a whole lot to get these initial - and these
11 are the initial postings that I described on yesterday. Gbarnga
12 is a major posting. We leave and we get to find out that this
13 attack occurs. For us - for the men left on the ground,
14 decisions had to be taken. This appeared to have been a sinister
09:50:18 15 move on the part of the ECOMOG and whoever were deployed there to
16 bring in these people to take over the capital. So it appears to
17 us that there was acquiescence on their part to undertake this
18 diabolical move to destroy the city of Gbarnga while we are at
19 peace talks in Akosombo. They were not held very long. They
09:50:50 20 were released, but this I think is more of a security measure,
21 because it just appeared to be too diabolical at the time.

22 Q. Now, it carries on:

23 "The breakdown of command and control in NPFL areas and the
24 taking of Taylor's headquarters at Gbarnga provided the coalition
09:51:18 25 forces with the opportunity to launch a series of attacks against
26 Taylor's forces in the northern and eastern regions of the
27 country".

28 And I think it might be of assistance when we look at the
29 next paragraph, Mr Taylor, to have before us the coloured map of

1 Liberia. Yes, that map. And if we can arrange it so that we
2 have all of the map on the screen so that whilst reading, we can
3 have in mind the particular areas. So "Over the course of the
4 past few months, a number of counties in the southeastern part of
09:52:22 5 the country have come under the control of the LPC. NPFL now
6 seems to control parts of Nimba and Bong Counties".

7 Now help us, Mr Taylor. As we look at the map, Mr Taylor,
8 Nimba and Bong we can see next to the letter - the number 3, yes?

9 A. Yes.

09:52:51 10 Q. It is the blue shaded area, yes?

11 A. Yes, but the counties they're referring to when they talk
12 about the southeast, if you go a little further down westward you
13 see River Cess County, and following further south there is Sinoe
14 County and then you see Grand Gedeh. That is the - these are the

09:53:20 15 Kru, the Sapo and the Krahn. I have mentioned to this Court that
16 the Sapos and the Krahns are related, so this whole move I think
17 is an attempt really - let's - I think maybe the judges need to
18 understand what is going on generally at this time with all these
19 moves. This taking of Gbarnga was not just one of these

09:53:52 20 off-the-cuff, I mean, acts. A plan apparently was made to take
21 me outside the country and while I am outside, that they will
22 capture all of the NPFL areas and they would not have to deal
23 with the NPFL again. And so this is why they have really armed
24 the AFL; they have armed the LPC as mentioned here; they have
09:54:23 25 armed part of ULIMO-J; and my former ministers are all well
26 equipped. And so this is why they begin this massive movement
27 southward which is River Cess, Grand Bassa, River Cess here. I
28 am pointing where they can't see me.

29 Q. Who have armed them?

1 A. ECOMOG. ECOMOG has armed them and they are moving and if -
2 as we go further this Court has heard the evidence of the trial
3 and execution of Cassius Jacob. These ministers of mine that
4 have left still having contact behind them, arranged with the
09:55:09 5 general who is in charge of Gbarnga to mutiny. This is so. When
6 we get to that Jacob execution, it was given to the Court as
7 though I was just going around killing people, but that's the
8 whole genesis of that particular problem.

9 Q. Well, tell us about that now then, Mr Taylor.

09:55:31 10 A. Well, Cassius Jacob is now - by 1993 becomes the commander
11 of the Executive Mansion Guard unit. Before 1993 the commander
12 was a gentleman called Michael, as in normal Michael, Paygar,
13 that's P-A-Y-G-A-R. Cassius Jacob is left in charge in 1994 in
14 the capital city with all of the units under his command.

09:56:17 15 Through the influence I'm sure of ECOMOG and money my ministers -
16 my former ministers - are carrying on, maybe I'm sure which is
17 normal, security infiltration and finally get the consent of
18 Cassius Jacob to really mutiny upon their attack on Gbarnga. And
19 so I leave and the attack takes place from two different
09:56:51 20 directions. The UN report is giving the general picture. I
21 don't know if the judges will let me move over and show you?

22 Q. Yes, go ahead.

23 A. Would you like that?

24 Q. Yes, please.

09:57:09 25 A. This force has consolidated in Buchanan. They come up in
26 this direction all the way. They attack from the west into
27 Gbarnga. The Alhaji Kromah group, ULIMO, attack from the east
28 and they come from two sides and hit Gbarnga. They then -
29 Cassius Jacob then orders his men to surrender to them without a

1 fight, but most of these commanders are not about to stand for
2 that. So a lot of the company commanders that had been posted
3 around Gbarnga refuse his orders and fight back. They do not
4 succeed in stopping the taking of Gbarnga and so they withdraw
09:58:12 5 and come back into the town of Ganta.

6 And I am at Akosombo. I return to Liberia after that in
7 the town of Ganta to begin to try to retake the capital. So what
8 am I saying in short? The Secretary-General's report is telling
9 you about these massive attacks. What he does not get into is
09:58:34 10 who is really behind it. It is ECOMOG again after luring me out
11 of the country use everyone else on the ground to attack me.

12 Q. And so what happens then to Cassius Jacob?

13 A. Well, we return. You know, that's one thing about these
14 guerrilla organisations; sometimes people can be really good. By
09:59:00 15 the time I get back the word has spread to other divisions,
16 because he is just the commander of the capital. Some of the
17 other very, very strong divisions, like the marine division that
18 is located further down towards Monrovia in the Harbel area and
19 the strike force division that is really stationed in the Nimba
09:59:31 20 County region, have all gotten the information. By the time I
21 get back they have arrested him. They have already arrested him
22 and he is in custody waiting for my return. He is arrested and
23 the court martial board convened in Ganta, the town of Ganta.
24 The process took several months and he was found guilty, he
09:59:57 25 confessed and he was executed.

26 Q. He confessed to what?

27 A. To mutiny. He said that he had been contacted from
28 Monrovia by one of the former ministers, Mr Dokie, Samuel Dokie.
29 I mentioned that. Cassius Jacob, by the way, let me mention, is

1 from Nimba County also. So is Dokie. So they used that
2 influence to convince him and he sold out and he had been
3 promised a position in Monrovia once a government was formed and
4 that he was sorry about it, but it was a revolution and so he was
10:00:40 5 judged, found guilty and the punishment was execution and he was
6 executed.

7 Q. Was he represented?

8 A. Oh, yes. He went before a tribunal. There was no - and I
9 think the evidence before this Court, there was no time when just
10:00:56 10 get up in the morning, arrest this man, take him out, shoot him.
11 No, no, no, no, no. There was a legal process that went through
12 and I am sure any major military in the world, I don't care what
13 military it is, an officer involved in mutiny - maybe now they
14 don't get executed, but under the uniform code of military
10:01:22 15 justice they could get life at best.

16 Q. Okay, thank you for that, Mr Taylor. I wonder if you could
17 go back now and if we could replace the document on the overhead,
18 please. Now, let's go back to what is being said here:

19 "The NPFL now seems to control parts of Nimba and Bong
10:01:55 20 Counties as well as parts of northern Grand Gedeh and Margibi.
21 ULIMO-Johnson is still in control of Grand Cape Mount, Bomi and
22 Lower Lofa Counties and has repelled recent incursions on
23 Tubmanburg by ULIMO-Kromah, reportedly assisted by some elements
24 of ECOMOG. Upper Lofa continues to be under the control of
10:02:31 25 ULIMO-Kromah. Margibi County, especially between Kakata and
26 Konola, is an area of intense fighting between NPFL and coalition
27 forces as the latter attempt to move northwards towards Gbarnga.

28 According to some reports, the various factions continue to
29 receive arms. There are also allegations of complicity on the

1 part of some ECOMOG elements with the warring factions,
2 particularly in regard to the military activities of coalition
3 forces against NPFL. The fact that these allegations persist
4 constitutes an impediment to the peaceful resolution of the
10:03:21 5 conflict.

6 In recent weeks, ECOMOG has suffered casualties from
7 ambushes by both NPFL and ULIMO-Johnson in the Margibi area.
8 Civilians have also been killed by land mines planted in an
9 apparent effort to disrupt the advance of coalition forces.

10:03:46 10 Overall, the military situation remains confused, with
11 groups aligning and realigning themselves depending on their
12 short-term interests and the breakdown of command and control
13 within the factions. The situation in Liberia is reaching the
14 point where warlords without any particular political agenda but
10:04:09 15 with the control of a certain number of soldiers are seeking
16 territory for the sake of adding to their own claim to power."

17 Pausing there, Mr Taylor. Can you explain what that means,
18 that last sentence?

19 A. Yes, the conventional wisdom at that time was since a
10:04:35 20 government would be set up anyway, if you put a group together
21 and start some fighting, probably kill innocent people for
22 nothing, you claim some territory and then you have a seat at the
23 table in government.

24 Let me just for the sake of the Court - you have seen this
10:05:02 25 phrase, or you want to call it terminology, what they call
26 coalition forces. The coalition forces mentioned here is not a
27 sum total of the rest of the forces fighting. This is the title
28 of the forces that were put together by my former ministers.
29 They are called coalition forces. So that's the name of a

1 faction, okay. Not as in ULIMO, AFL coming together as a
2 coalition, no. Coalition forces refers here to this faction that
3 has been put together by my former ministers. That is just to
4 clarify what that means.

10:05:51 5 Q. "Reports indicate that the fighting is likely to persist
6 both within NPFL and between NPFL and rival factions until
7 control of Gbarnga is consolidated. The current fighting in
8 Liberia is small-scale bush fighting. The results are not large
9 military victories, but deaths mostly of civilians, the
10:06:10 10 decimation of entire villages and the breakdown of any semblance
11 of law and order. Most of the fighters are not well trained, but
12 are young men and boys, often with little choice but to be
13 manipulated by the various warlords."

14 And then it continues:

10:06:31 15 "It will be recalled that, in accordance with the Cotonou
16 Agreement and the UNOMIL concept of operations, unarmed United
17 Nations military observers were to be deployed together with
18 ECOMOG troops which were to provide their security. Given
19 ECOMOG's logistic difficulties, UNOMIL began its deployment
10:06:54 20 before ECOMOG. In so doing, UNOMIL sought and received the
21 commitment of the factions to ensure the security of its military
22 observers. The first months of such deployment went smoothly.
23 ECOMOG soon followed the UNOMIL deployment pattern in some areas,
24 including Gbarnga in the northern region. However, in July of
10:07:21 25 this year, because of the already deteriorating security
26 situation, especially in the western region, UNOMIL deployment
27 was reduced from 29 to 21 team sites.

28 On 9 September, NPFL elements detained 43 unarmed UNOMIL
29 military observers and six non-governmental organisation

1 personnel at nine sites in the northern and eastern regions,
2 confiscating their transport, communications and most other
3 equipment. This occurred soon after Charles Taylor's
4 headquarters were taken by ULIMO-Kromah. It is felt that the
10:08:09 5 detention of those personnel may have been a premeditated action
6 on the part of NPFL (1) to use the observers as a shield against
7 attacks by renegade NPFL forces or rival factions, and (2) to
8 secure reliable communication and transportation facilities from
9 UNOMIL and non-governmental organisations to further their war
10:08:33 10 efforts."

11 Mr Taylor, did you order that?

12 A. I am in Akosombo. I am not in any contact with what is
13 going on on the ground. When I do - I think the
14 Secretary-general is right here when he said "detained".
10:08:48 15 Remember I am at Akosombo. We have no communication whatsoever.
16 But they are released immediately and this is why he did not say
17 arrested, he said detained. And they are released upon my
18 arrival back into Ganta.

19 Q. Because if we skip a few lines, in paragraph 30 we see:

10:09:08 20 "On my instruction my special representative personally
21 informed Charles Taylor that the United Nations held him
22 responsible for the welfare of the UNOMIL military observers."

23 Is that true?

24 A. Yes, I am in Akosombo, yes.

10:09:28 25 Q. And then if we jump again to paragraph 31 we see:

26 "On the 14th September, 33 United Nations military
27 observers were released and found their way to relative safety.
28 An attempted helicopter rescue of the United Nations military
29 observers stationed at Harbel was aborted when the helicopter was

1 shot at by NPFL elements."

2 A. I think here it is at Harper.

3 Q. Harper?

4 A. Yes, that is the far southeastern tip of Liberia.

10:10:02 5 Q. "...was shot at by NPFL elements and forced to leave the
6 area after rescuing two of the 12 observers detained there". Do
7 you know about that?

8 A. Well, I heard about it, but it was a very silly thing for
9 the United Nations to do and it was silly. We are talking about
10:10:21 10 the far tip end of Liberia. There is war and all they had to do
11 was to inform people that if they see - you know, if you see a
12 helicopter coming in not knowing what it is and you assume that
13 it is an enemy helicopter, since everyone is under attack, you
14 don't fly into a war zone without informing people that you are
10:10:42 15 going in. So I am glad that they did not get hit, but I did tell
16 them it was a silly thing to do.

17 Q. And if we jump forward to paragraph 32, we see that by 18
18 September all military observers and non-governmental
19 organisation personnel had been released. Now tell us - help us
10:11:04 20 with this, Mr Taylor. By 18 September had you returned to
21 Liberia?

22 A. Yes.

23 Q. Now having dealt with those matters, Mr Taylor, is there
24 anything else you would like to assist us with in terms of this
10:11:23 25 report?

26 A. Yes, just the final part. I think I mentioned the peace
27 enforcement aspect of the unit, and I am trying to find it. I
28 think if there is no disagreement about that, I think we can move
29 on because I will have to read through this. But they were given

1 peace enforcement. ECOMOG was given peace enforcement. Oh, boy.
2 Well if we can't find it now, I'm sure maybe - I have mentioned
3 it in the records, so we can always provide it for the judges
4 later. But it is in here.

10:12:19 5 Q. Very well. Right. So can we leave that document now,
6 Mr Taylor?

7 A. Yes.

8 MR GRIFFITHS: Thank you. Mr President, could I ask for
9 that document to be marked for identification, please. It will
10:12:42 10 be corrected if I am wrong, but I think it is MFI-8.

11 PRESIDING JUDGE: That is correct, yes. The copy of the
12 document of the United Nations Security Council Resolution
13 entitled, "7th Progress Report of the Secretary-General on UN
14 Observer Mission in Sierra Leone" dated 14 October 1994 will be
10:13:07 15 marked for identification MFI-8.

16 MR GRIFFITHS:

17 Q. Now what else can you tell us about events in 1994,
18 Mr Taylor?

19 A. I think these are the last important issues of 1994. We
10:13:37 20 have now an agreement for the final deployment of our forces
21 throughout the country. We have also set up in that agreement a
22 date for a final ceasefire. We have also set up in that
23 agreement a date for the leaders - this time the actual leaders,
24 and it was emphasised and not their representatives - to
10:14:15 25 themselves sit on the Council of State to bring final peace in
26 Liberia. So I think this is a significant end of 1994 that I can
27 recollect right now.

28 MR GRIFFITHS: Right. I would like you now to pause there,
29 please, and enquire do your Honours have a bundle of photographs,

1 week 30 additional binder of photographs, Defence photographs 1
2 to 11?

3 PRESIDING JUDGE: Yes, we have that.

4 MR GRIFFITHS: I am grateful. Can I enquire whether
10:14:53 5 opposing counsel have this bundle?

6 MS HOLLIS: Yes, we do.

7 MR GRIFFITHS: I am grateful. I wonder if the witness
8 could be shown this bundle of photographs, please:

9 Q. Now, Mr Taylor, I would like you to take us through these
10:15:41 10 photographs, please, and help us with dates, locations and
11 events?

12 A. Yes.

13 Q. DP1, where is this photograph taken?

14 A. This photograph is taken in Lome, Togo.

10:15:59 15 Q. When?

16 A. This is around 1990. We are at Lome holding discussions
17 between the INPFL, the - I'm not sure what he used International
18 something, but this is the extension of the National Patriotic
19 Front, that group that broke away headed by Prince Johnson. Also
10:16:43 20 as he gets into the Monrovia area the fracas is occurring. That
21 "I" stands for "Independent" National Patriotic Front of Liberia.
22 This is the agreement signed between the Armed Forces of Liberia,
23 the Independent National Patriotic Front of Liberia and the NPFL.

24 Q. Now, help us. The three individuals we see seated?

10:17:11 25 A. Yes.

26 Q. On the left, who is that in the white jacket?

27 A. That is Lieutenant General Hezekiah Bowen. That is
28 B-O-W-E-N. He is the chief of staff of the Armed Forces of
29 Liberia right there with the red tie.

1 Q. And that is you in the centre?

2 A. That is correct.

3 Q. Who is the individual to the right with the spectacles?

4 A. That is Prince Yealue Johnson, the leader of the

10:17:45 5 Independent National Patriotic Front of Liberia.

6 Q. How do you spell his middle name?

7 A. Y-E-A-L-U-E. I stand corrected.

8 Q. And the individuals standing in the background, are any of
9 them of any significance?

10:18:10 10 A. Yes. The individual that is leaning over the left shoulder
11 of Mr Johnson is Dr Peter Nyiangow. That is spelt
12 N-Y-I-A-N-G-O-W. We can probably correct that later. It is a
13 tribal name meaning eyeball, nyiangow.

14 Q. Mr Taylor, I think it might be easier if you were to
10:18:55 15 indicate on the overhead so that there can be no uncertainty as
16 to who it is you are pointing to?

17 A. Okay, very well.

18 Q. Okay?

19 A. Yes.

10:19:19 20 Q. At the risk of boring everyone, can we just quickly again
21 catch up on what you have just told us. Point to Lieutenant
22 General Hezekiah Bowen?

23 A. This is General Bowen right here.

24 Q. Now there is you in the centre?

10:19:38 25 A. That is correct.

26 Q. With hair, and then to the right who is the gentleman
27 seated?

28 A. This gentleman is Prince Yealue Johnson.

29 Q. And then the other individual you indicated?

1 A. This individual leaning over his left shoulder is Dr Peter
2 Nyiangow. This gentleman standing here, who appears to be on the
3 telephone, is Dr Alfred Kula. That is spelt K-U-L-A. Dr Kula.
4 You can barely see him, so I am not going to worry about it.

10:20:27 5 Okay.

6 Q. Anybody else?

7 A. These are all members of other delegations. I am not
8 familiar with any of these except this gentleman, if the judges
9 can see him. He is Counsellor Peter Bonner Jallah. That is
10 Bonner, B-O-N-N-E-R and the last name is Jallah, J-A-L-L-A-H.
11 And that will be important later on. That is why I mention his
12 name.

10:20:45

13 MR GRIFFITHS: Okay. Can we place on the overhead now,
14 please, DP2.

10:21:24

15 PRESIDING JUDGE: Yes, Mr Griffiths, I am not sure whether
16 you are going to tender these photos or not, but when they are,
17 tendered there won't be any names attached to the people that the
18 witness is indicating now unless we go back into the transcript
19 and read the transcript alongside the photographs.

10:21:46

20 MR GRIFFITHS: Well, I agree, Mr President:

21 Q. Mr Taylor, what I think would be a good idea, as we go
22 through the photographs just so that we have a complete record,
23 when you mention a name can you indicate with an arrow the person
24 you are talking about, and then we will sign and date it as we
25 did with exhibits yesterday, okay? So can we go back to DP1
26 then, please, and begin the exercise?

10:22:08

27 PRESIDING JUDGE: Well, just to make that clear, did you
28 mean for Mr Taylor to simply put an arrow, or a name with an
29 arrow?

1 MR GRIFFITHS: A name with the arrow.

2 Q. All right. So let's go back to DP1, please, Mr Taylor, and
3 could you mark on it, indicating with an arrow the person being
4 named, all the individuals you have just told us about?

10:22:48 5 A. Very well. The gentleman here --

6 Q. Well, you don't have to tell us. Just mark it on there.

7 A. Uh-huh.

8 Q. Okay?

9 A. Yes.

10:24:37 10 Q. Could you now sign it, please. Right. Can you sign it
11 now, Mr Taylor?

12 A. It is signed and dated.

13 Q. And dated?

14 A. Yes.

10:25:11 15 Q. Right, thank you.

16 PRESIDING JUDGE: I think it would also be helpful, there
17 appear to be a number of photographs, so if this photograph could
18 be labelled in consistency with the witness's evidence already as
19 "Lome, Togo around 1990".

10:25:31 20 MR GRIFFITHS: Right:

21 Q. Perhaps if you write that on there as well, please.

22 A. Very well.

23 Q. And so we will adopt this procedure from now on with the
24 other photographs, Mr Taylor, yes?

10:25:41 25 A. Yes.

26 MR GRIFFITHS: Mr President, would it be appropriate to
27 have one global MFI number and then break it down into A, B, C
28 and so on?

29 PRESIDING JUDGE: I think that is the best way to go about

1 it. We will label them as we go, I think.

2 MR GRIFFITHS: So could I ask that this photograph be
3 marked for identification, please. MFI-9 I think we are up to.

4 PRESIDING JUDGE: MFI-9. I think we will use the alphabet.
10:26:29 5 We will make it MFI-9A is the photograph taken in Lome, Togo
6 around 1990.

7 MR GRIFFITHS:

8 Q. Can we now go, please, to DP2.

9 A. This is also in Togo. We are at a conference. This could
10:27:13 10 be a second conference in Togo.

11 Q. Are we talking about the same date?

12 A. This is - apparently I have already identified this as
13 being in early 1991 in Togo.

14 Q. Right. So taking things slowly now, could you write at the
10:27:36 15 bottom "Togo around 1991"?

16 PRESIDING JUDGE: Well, there is a specific date marked on
17 the photograph.

18 THE WITNESS: Yes, it is on the photograph.

19 MR GRIFFITHS: It is 27.

10:27:54 20 THE WITNESS: Two.

21 MR GRIFFITHS:

22 Q. Is that 2?

23 A. Yes.

24 Q. '91. And are we talking about the same occasion as the
10:28:02 25 first photograph, Mr Taylor?

26 A. Not the same date, but the same occasion at another time
27 when we are back in Togo.

28 Q. Right, okay. And the next part of the exercise, can we go
29 through and name the individuals, please?

1 A. Here, seated right here, who is chairing this meeting, this
2 is President Gnassingbe Eyadema of Togo. I will just put
3 President, I am very terrible, your Honours, at spelling, so
4 Eyadema.

10:28:56 5 Q. I understand that name is already in the record.

6 A. Very good. Seated to his immediate left is myself.

7 PRESIDING JUDGE: Mr Court Attendant, would you drop that
8 photograph so that we can see what the witness is writing. It is
9 not coming up on the screen. Perhaps lower the photograph. Yes,
10:29:36 10 that's right.

11 THE WITNESS: Is that okay, your Honour?

12 PRESIDING JUDGE: Well, it can be - you have got some space
13 at the top. You can raise it a little bit so we can see more of
14 the photo.

10:30:00 15 THE WITNESS: Can I continue now, your Honour?

16 PRESIDING JUDGE: Yes, go ahead.

17 THE WITNESS: Thank you. This is Charles Taylor here.

18 Here is Mr Prince Johnson. Now I am not going to mark this, this
19 looks like General Bowen, but I will tell you I can't - I will
10:30:45 20 just leave that. Here is my wife. And this here, right here, is
21 Dr Nyiangow. This is going to be a bad spelling. I don't know
22 this gentleman, I don't recall who he is, but these are just
23 other people at this particular luncheon.

24 JUDGE SEBUTINDE: Mr Taylor, you don't mention your wife's
10:31:44 25 name for the record.

26 THE WITNESS: Yes, her name is Agnes Taylor.

27 MR GRIFFITHS:

28 Q. Do you recognise anybody else in that photograph,
29 Mr Taylor?

1 A. No, not really. It is a little unclear for me, but that is
2 about all. I do not want to speculate about General Bowen here.

3 Q. I don't want you to do that.

4 A. No.

10:32:23 5 Q. Could you sign and date the photograph then, please?

6 A. I think the President wants to see the correct thing.

7 PRESIDING JUDGE: The judges would like to have a look at
8 that photograph, Mr Griffiths.

9 MR GRIFFITHS: Of course. I don't know if my learned
10:33:10 10 friend would like to see it as well?

11 MS HOLLIS: No, thank you.

12 MR GRIFFITHS: Very well. Okay, can we go to the third
13 photograph then, please.

14 PRESIDING JUDGE: Well, we had agreed to mark them as we go
10:34:06 15 along, so that photograph - incidentally it had been catalogued
16 as DP2 and the previous photograph was catalogued as DP1 by the
17 Defence, but in any event the photograph last in evidence will be
18 marked for identification - or last discussed by the witness will
19 be marked for identification MFI-9B and that is the photograph of
10:34:41 20 the second conference in Togo bearing the date 27 February 1991.

21 MR GRIFFITHS:

22 Q. Now the same procedure, please, Mr Taylor. Firstly, which
23 occasion is this?

24 A. This is a further - this is also in '91. I am on a peace
10:35:16 25 mission to Dakar, Senegal, and I am there meeting the then
26 President of Senegal, President Abdou Diouf.

27 Q. Give us the spelling again, please?

28 A. Abdou Diouf. I think that Diouf - I am going to have to
29 try to - I think it is D-I-O-U-F or - but this was the then

1 President of Senegal, President Diouf. Do you want me,
2 Mr President, to write in these, start writing?

3 PRESIDING JUDGE: I will leave that to your counsel.

4 THE WITNESS: Okay.

10:36:00 5 MR GRIFFITHS:

6 Q. Yes, please.

7 A. This is in 1991. The beginning of 1991.

8 Q. Well, we have the date on the photograph at the bottom
9 right-hand corner.

10:36:39 10 JUDGE SEBUTINDE: Where?

11 MR GRIFFITHS: Just here, 91/3/8 in orange in the bottom
12 right corner:

13 Q. Who else is in that photograph, Mr Taylor? Do you recall?

14 A. Yes, I am here.

10:37:20 15 Q. Yes?

16 A. The third person standing here, this gentleman here, is a
17 veteran diplomat from Liberia. He is Ernest Eastman who is
18 serving as my foreign minister. The gentleman standing here is
19 an aide-de-camp of President Diouf. I do not know his name.

10:38:23 20 Q. Well, if you just write that in, "Aide-de-camp to President
21 Diouf" for future reference, okay?

22 A. Yes.

23 Q. And can we sign and date it, please.

24 A. Yes.

10:39:31 25 MR GRIFFITHS: Can I now ask, Mr President, that the
26 photograph catalogued as DP3 be marked as our MFI-9C.

27 PRESIDING JUDGE: Yes, that will be marked for
28 identification as MFI-9C.

29 MR GRIFFITHS: Would your Honours like to see the

1 photograph?

2 PRESIDING JUDGE: No.

3 MR GRIFFITHS: Very well.

4 PRESIDING JUDGE: What about you, Ms Hollis? Do you want

10:40:00 5 to see the photograph?

6 MS HOLLIS: No, Mr President, we are fine.

7 PRESIDING JUDGE: Thank you.

8 MR GRIFFITHS:

9 Q. Very well. Can we move on then, please, to the next

10:40:09 10 photograph. Now you will see, Mr Taylor, the same date in the

11 bottom right-hand corner of the photograph, yes?

12 A. That is correct.

13 Q. Where was this photograph taken?

14 A. This photograph is also taken in Dakar, Senegal, at the

10:40:44 15 same time.

16 Q. And who do we see in the photograph? Same procedure,

17 please. Draw an arrow and write the name?

18 A. The gentleman sitting here is a gentleman whose name has

19 come up in my testimony. This is Mr John Dobrin, an official of

10:41:17 20 the United States State Department.

21 Q. You may recall, Mr Taylor, that we looked at a memo sent by

22 Tom Wowei yu to Mr John Dobrin?

23 A. That is correct. This is the gentleman, Mr John Dobrin.

24 This gentleman here is who appeared in the photograph before,

10:41:50 25 Mr Ernest Eastman, my foreign minister.

26 Q. Now, help us. These talks in Dakar in March of 1991, what

27 were they about?

28 A. Present in Dakar is the Deputy Assistant Secretary of State

29 for African Affairs.

1 Q. Who is that?

2 A. Leonard Robinson. I am saying the deputy assistant. Not
3 the assistant, but the deputy assistant. He has come to Dakar to
4 meet me and my people to discuss the problems in Liberia and to
10:42:49 5 see how - now that the United States wants to get engaged in the
6 process, they have come for us to hold discussions and he brings
7 along with him John Dobrin. So it is a delegation.

8 Q. And for how long do those talks last, can you help us?

9 A. Oh, a couple of days. Just about a couple of days. These
10:43:23 10 were not major negotiations, no. A couple of days. They had
11 come to find out what could they do that a decision had now been
12 taken to get engaged and the talks did not go very well, because
13 - well, they went I would say 50 per cent well, because it was at
14 this meeting that really I think some little confusion came up
10:43:55 15 between the two sides because of a statement that Mr Robinson
16 made to me in that meeting that really caused some concerns on
17 all of our parts.

18 Q. What was that statement?

19 A. Leonard Robinson said to me "Well, Mr Taylor, you were
10:44:19 20 encamped around Monrovia. This war is now - why didn't you just
21 take Monrovia?" So I said to him, I said, "Leonard, you can't
22 ask me this question. You know that your chief, the Assistant
23 Secretary of State, came to me in the bush and asked me not to
24 take Monrovia". And what Leonard said to me was, "Well, you
10:44:45 25 should not have listened to him". Then I said, "Oh, I should not
26 have listened to an official of the United States government
27 making an official request on behalf of the government? We
28 follow it and we have this debacle now in Monrovia, in Liberia,
29 and you're telling me I should not have listened to him?" This

1 is when we decided that we really didn't know who to trust again.
2 Because when the United States government asked us officially to
3 do something and we do, and another official says we should not
4 have listened, I think this really threw, you know, a monkey
10:45:23 5 wrench, so to speak, in the whole process. And we left from
6 there feeling very, very bad that we had made an error by
7 listening, but this is what I meant when I said to the Court
8 before I have no regrets because lives were saved at that time,
9 but this meeting did not really go down very well.

10:45:43 10 Q. Very well. Can we sign and date that one, please. Okay.
11 And can we mark that, please, Mr President, for identification?

12 PRESIDING JUDGE: Yes, that photograph that has been
13 catalogued by the Defence as DP4 will be marked for
14 identification MFI-9D.

10:46:52 15 MR GRIFFITHS: Yes:

16 Q. Now this photograph, DP5, we note the date in the bottom
17 right-hand corner, 13 March 1991. So this is five days after the
18 meeting in Dakar. Do you follow me, Mr Taylor?

19 A. Yes, I do.

10:47:23 20 Q. Where is this photograph taken?

21 A. This is back in Gbarnga, Liberia.

22 Q. And where in Gbarnga?

23 A. This is at the place that is still being prepared for me
24 where I will live in Gbarnga.

10:47:46 25 Q. And who do we see in this photograph?

26 A. This gentleman here is an officer of ECOMOG that has come
27 up to Gbarnga on a goodwill tour. I am sorry, I can't remember
28 the gentleman's name right now. So many of them came, I don't -
29 I have thought and thought. I can't remember his name, but you

1 can tell from the armband this is an ECOMOG official who has come
2 on a goodwill tour to Gbarnga. I don't remember his name. I am
3 seated here.

10:48:43 4 Q. Well, what I would like you to do, please, in respect of
5 the uniformed gentleman seated, is just mark with an arrow
6 "ECOMOG officer"?

7 A. Very well.

8 Q. Now pausing there for a moment, Mr Taylor, you have earlier
9 told us that effectively the NPFL were in a state of war with
10:49:22 10 ECOMOG. Do you remember telling us that?

11 A. Oh, yes. Oh, yes.

12 Q. So how does it come about that you were having, what
13 appears on the face of it to be, a somewhat cordial meeting with
14 an ECOMOG officer?

10:49:36 15 A. Well, if you look at what we have been doing, I am not some
16 wild mad dog fighting, killing people as they want to portray me.
17 In 1990 we are talking peace. Here I am in Senegal meeting with
18 the President talking peace. I am meeting with United States
19 State Department officials talking peace. At this particular
10:50:06 20 period I am making preparations to move to Gbarnga. If you see I
21 rushed back from Senegal because while we are fighting, I am
22 still trying to pursue the path of peace. And so we have given
23 ECOMOG the okay to come through our lines, okay, to meet with me.

24 And I intentionally - at this particular time I am not fully
10:50:38 25 living in Gbarnga. I am still in Harbel Hill, but I make sure to
26 come all the way to Gbarnga intentionally for him to really have
27 a very good look at where we are going to settle. So we are
28 meeting ECOMOG because we still want peace even though there is -
29 you know, there are some little, you know, clashes going on, but

1 we still want peace.

2 Q. Now bear also in mind in respect of the date, Mr Taylor,
3 this would be a matter of days, wouldn't it, before the invasion
4 of Sierra Leone? This is March 1991?

10:51:29 5 A. Yes.

6 Q. 13 March?

7 A. Yes.

8 Q. And the invasion took place, according to an RUF document
9 we looked at yesterday, on 23 March. So this is, what, ten days
10:51:43 10 before that? So on what you are telling us, ten days before that
11 invasion of Sierra Leone you are talking peace with an ECOMOG
12 officer?

13 A. Yes, because I don't even know what they are doing. I am
14 basically pursuing peace, and several days before that I am in
10:52:03 15 Dakar, Senegal. So quite frankly, I don't know what is going on
16 on that side. I am pursuing - I am trying to basically pursue a
17 line of peace to get this war stopped because of the stalemate
18 that has developed after the killing of Samuel Doe in September
19 of 1990, and then you have the INPFL, the AFL. There is
10:52:33 20 confusion, but what I am trying to do is to see if we can try to
21 work this peace process as quickly as possible.

22 Q. Yes. Could we then please - could you then, please, sign
23 and date that document. Okay. Could that photograph be marked
24 for identification, please, Mr President? And it is MFI-9E, I
10:53:33 25 think.

26 PRESIDING JUDGE: That is correct. That photograph
27 catalogued DP5 by the Defence is now marked MFI-9E.

28 MR GRIFFITHS: Very well:

29 Q. Now, Mr Taylor, what do we see in this photograph, DP6?

1 A. In this photograph this is around the time that I finally
2 move into Gbarnga. This is my - this is a convoy moving into
3 Gbarnga. This is my jeep.

4 Q. Mark it, please?

10:54:25 5 A. This is - I am in this jeep. This is a Mercedes Benz level
6 6 armoured jeep and I mention that because there is evidence in
7 this Court that I was riding a looted vehicle belonging to I
8 don't know who. Someone brought that before. Well, this is my
9 armoured - level 6 or better armoured Mercedes Benz jeep that I
10:55:04 10 am riding and I do not ride any other vehicle in Liberia
11 throughout the war but an armoured vehicle.

12 Q. And we see a date marked on it, 6 July 1991. Well, I will
13 wait until you have --

14 A. Yes.

10:55:39 15 Q. Yes, we see the date 6 July 1991 and you confirm, do you,
16 this is taken in Gbarnga?

17 A. That is correct.

18 Q. Can we see the Executive Mansion in this photograph?

19 A. No, you cannot. I am arriving - this is my arrival in
10:56:03 20 Gbarnga. No, you can't.

21 Q. And is there anything else of note in this photograph?

22 A. Oh, nothing I would want to point out now. No.

23 JUDGE SEBUTINDE: By arrival you mean to settle for the
24 first time?

10:56:23 25 THE WITNESS: That is correct. To actually stay in
26 Gbarnga. I had been going and coming, your Honour, but this is
27 my big arrival to stay in Gbarnga.

28 MR GRIFFITHS:

29 Q. Right. So this photograph marks the date on which you

1 moved to Gbarnga permanently?

2 A. That is correct.

3 Q. Mr Taylor, whilst we have this photograph up, can I pause
4 to ask you about a little detail. After this date, 6 July 1991,
10:57:28 5 can you recall now the first time you made a trip to Voinjama?

6 A. I would have to reflect on this a little bit. My trip to
7 Voinjama would have to be very close to one of my trips to
8 Yamoussoukro. I would say this has got to be somewhere I would
9 say - I would put it to going towards the last quarter of '91 or
10 thereabouts.

11 Q. And was that the first time you went to Voinjama?

12 A. And the only time, yes.

13 Q. So just so that we are clear about this, on your account
14 the only occasion on which you went to Voinjama was in the last
10:58:46 15 quarter of 1991. Is that correct?

16 A. That is correct.

17 Q. Thank you. I wonder if you could now entitle this
18 photograph "Photo marking permanent move to Gbarnga" and then
19 sign and date it, please. So the title is "Photograph marking
10:59:17 20 permanent move to Gbarnga". Before we leave the photograph,
21 Mr Taylor, did your vehicle have a number plate?

22 A. At this time, no, it was just - it was just a blank
23 whatchamacallit - no.

24 Q. Did it later have a number plate?

11:00:21 25 A. Yes, not a number. It had a name plate.

26 Q. What was it?

27 A. Later on it was marked just my middle name Ghankay, that is
28 G-H-A-N-K-A-Y. Ghankay was written on it, Ghankay 1.

29 Q. Okay, let's put that one away now, please.

1 PRESIDING JUDGE: You want that marked?

2 MR GRIFFITHS: Yes.

3 PRESIDING JUDGE: It is catalogued DP6 by the Defence. It
4 will be marked for identification MFI-9F.

11:00:54 5 MR GRIFFITHS: I am grateful:

6 Q. Right. What do we see in this photograph, DP7, Mr Taylor?

7 A. This is the photograph of an artillery gun. A long range
8 artillery gun.

9 Q. And what is the significance of it?

11:01:28 10 A. This artillery gun is a gun that was given to the NPFL.

11 Q. By whom?

12 A. This was given to the NPFL by Foday Sankoh.

13 Q. And where did it come from?

14 A. It came from Sierra Leone.

11:01:58 15 Q. Yes, but to whom had it - who did it belong to in Sierra
16 Leone before it was given to you?

17 A. Well, it must have belonged to the Sierra Leonean armed
18 forces, but he gave us this gun.

19 Q. When did you receive this item of artillery from Foday
11:02:19 20 Sankoh?

21 A. We received this I would say very, very late in '91, or
22 maybe early 1992.

23 Q. So late 1991/early 1992, yes?

24 A. Yes.

11:02:43 25 Q. And help us, why was he giving it to you?

26 A. Well, they had captured this from enemy forces over there
27 and did not really know how to use it or had no one to operate it
28 and they asked if we might have use for it and we said yes and it
29 was given to us.

1 Q. And can you help us as to how it was transported from
2 Sierra Leone to Liberia?

3 A. Yes, it came over land from Mendekoma. It came into
4 Liberia. Don't forget now we are - as of this time we are
11:03:32 5 working the border war and we are fighting a common enemy at the
6 time. I am giving him ammunition and little things and so he
7 gets this gun and he finds out that we may have need for it so he
8 gives it to us.

9 Q. Okay. Can you assist us --

11:03:48 10 JUDGE SEBUTINDE: Sorry, the common enemy being who
11 exactly?

12 THE WITNESS: ULIMO, your Honour.

13 MR GRIFFITHS:

14 Q. Can you help us with the identity of any of the individuals
11:03:57 15 seen in the photograph?

16 A. No.

17 Q. It might be difficult because most of their heads have been
18 cut off.

19 A. I can't. I can't. We just took a shot of the gun. We
11:04:09 20 didn't even know how to probably operate it ourselves. No, I
21 can't recognise anybody here.

22 Q. Do you recall actually seeing this item at the time,
23 Mr Taylor?

24 A. Yes, I did see the gun.

11:04:24 25 Q. Where?

26 A. This gun, I saw it - it came to us in Gbarnga. I saw it in
27 Gbarnga.

28 Q. Now, apart from this particular item of artillery, were you
29 given any other items by Foday Sankoh?

1 A. Well, this was about the - if Foday Sankoh - like I said,
2 we can't lose the fact of the cooperation with this common enemy
3 that I described. Most of the stuff they captured they needed.
4 I can't recollect now any other equipment they may have given us,
11:05:13 5 but if they captured anything in the field that they did not know
6 or understand they might, you know, during that period say,
7 "Well, take a look at this", but to my recollection now this is
8 the one I recollect.

9 Q. And can you recall who it was that delivered this item?

11:05:31 10 A. I cannot directly recall, but for an item like this this
11 may have been something that Foday Sankoh himself would have
12 brought I would assume. He would not just trust this with
13 anybody, because it was coming something like, "Well, you help
14 and we are giving you this", so he personally would have brought
11:06:00 15 this.

16 JUDGE SEBUTINDE: And, Mr Griffiths, by given, you mean
17 donated, or exchanged for, or sold?

18 THE WITNESS: No, it was donated, your Honour.

19 MR GRIFFITHS:

11:06:24 20 Q. So just to assist a little further with that, did you give
21 Foday Sankoh anything in return?

22 A. Well, we have this cooperation going on the border. We are
23 fighting ULIMO. I did give him from time to time, I have told
24 this Court, small amounts of ammunition. He has given me this
11:06:46 25 gun. There was no time that Foday Sankoh bought something from
26 me. There was no time that I bought anything from him. Even I
27 mentioned to this Court that I had even given him a vehicle.
28 This is not a trading thing between us and it was not a buying
29 and selling, no. If I could help to protect my border, what I

1 gave him was to help him along that line and what he gave me was
2 to help along that line. There was no cash being or, like has
3 been said before this Court, diamonds being passed between us,
4 no.

11:07:28 5 Q. Now, help us. Is this weapon the same or different from a
6 40 barrel gun?

7 A. Oh, definitely.

8 Q. Definitely what?

9 A. It is different. This is a single, long range - if I am
11:07:50 10 not mistaken and I will stand corrected. There are better
11 military people on the other side than myself. This is a 155
12 millimetre gun, cannon. A 40 barrel as described I think is a
13 120 or 122 millimetre set of guns mounted on a truck with 40
14 tubes that are referred to as the BM-21. It is a mobile
11:08:29 15 launcher, the BM-21. So there is a big difference. This is on
16 two tyres that must be pulled by a vehicle, but the 40 barrel is
17 a mobile launcher.

18 Q. On that note, Mr Taylor, did you ever send a 40 barrel gun
19 to Sierra Leone for use by the RUF?

11:08:59 20 A. No, no, no. I think there is evidence before this Court
21 that one, or at least two, 40 barrel guns were captured by the
22 RUF from - I stand corrected on this - from Guinean troops that
23 entered Sierra Leone. No. In fact, the 40 barrel gun that
24 Liberia had, if you look further as we go into this, at
11:09:29 25 disarmament, the United Nations Disarmament Report on Liberia
26 reports that that 40 barrel that we owned in Liberia was
27 surrendered to the United Nations forces during disarmament in
28 96/97. It is a part of the records that is going to be shown to
29 this Court.

1 Q. Okay, right. Could we mark this "Artillery piece donated
2 by RUF to NPFL" and sign and date it, please?

3 A. Excuse me, counsel, do you want me to put the - I mentioned
4 in the records 155 millimetre. Do you want me to write that too?

11:10:19 5 Q. Yes, you can. "155 millimetre artillery piece" and could
6 you also put it on it, please, the date you gave us "Late 1991,
7 early 1992"?

8 PRESIDING JUDGE: Is that the date of the photograph, or
9 the date the gun was given to the NPFL?

11:11:06 10 MR GRIFFITHS: I will ask the witness:

11 Q. Is that the date of the photograph, Mr Taylor, or the date
12 when the gun was given to the NPFL?

13 A. The photograph is taken on delivery.

14 Q. And delivery was when?

11:11:20 15 A. I think it was late 1991 to around early 1992.

16 Q. Right. Could we write that information on the photograph
17 as well, please?

18 A. May I just add, this was also turned in during disarmament.

19 Q. Very well. Now, can we - could I have that, please, marked
11:12:06 20 for identification?

21 PRESIDING JUDGE: Yes, that is the photograph catalogued
22 DP7 by the Defence. That will be marked MFI-9G.

23 MR GRIFFITHS:

24 Q. Right. Now this photograph, Mr Taylor, what are we looking
11:12:59 25 at here?

26 A. We are looking at another artillery piece. This is - would
27 you like me to describe it?

28 Q. Yes, please.

29 A. This has all of the looks of a 105 millimetre Howitzer.

1 This is a United States made piece of artillery that we captured
2 from the Armed Forces of Liberia.

3 Q. And can you give us a rough date for this photograph?

11:13:45

4 A. This photograph was taken - this is about - oh, we could
5 have gotten this I would say around 1990. This has to be I would
6 say late 1990, if I am not mistaken, because after we took Camp
7 Naama these artillery pieces were there, and I have mentioned
8 that in my evidence. So this has got to be somewhere around
9 1990. Late 1990.

11:14:25

10 Q. And can you help us as to where the photograph was taken?

11 A. No, I can't. This could have been taken at Naama. It
12 could have been taken in the field. I guess this is just one of
13 those pieces that at the time a photo was taken. I can't recall
14 when this was taken.

11:14:45

15 Q. And you will see to the left of the picture what appears to
16 be the barrel of another weapon, top left-hand corner?

17 A. That is correct. Right there.

18 Q. What is that?

11:15:07

19 A. That looks like also the barrel of a Howitzer. This now
20 would make me believe that there are many other guns. Like I am
21 saying, we captured many of these guns, and this may be just a
22 picture showing one of them, but there could be even many more
23 that we don't see in this photo.

11:15:30

24 Q. And the gentleman wearing what appears to be a red bandana,
25 do you recognise him?

26 A. No, I don't know him. He is probably one of the people
27 that probably have either been trained on artillery or have
28 learned to fire these guns. I don't know him.

29 Q. Very well. Could you please label this photograph --

1 JUDGE SEBUTINDE: Could I enquire is the witness able to
2 say whether this gentleman is a member of the NPFL, or not?

3 THE WITNESS: Well, no, he has to be a member of the NPFL,
4 your Honour. With these guns, the Howitzers were not captured by
11:16:08 5 any other force in Liberia except the NPFL, and so he has to be
6 an NPFL personnel. He may be looking short, but he is a man.

7 MR GRIFFITHS:

8 Q. Now, Mr Taylor, could we label this, please, "Artillery
9 piece captured by NPFL from AFL late 1990" and sign and date it?

11:17:50 10 PRESIDING JUDGE: I couldn't read the last few words you
11 wrote there, Mr Taylor. What does that say in brackets?

12 THE WITNESS: I had just said around 1990. I am saying
13 mid-to-late 1990.

14 PRESIDING JUDGE: It is a bit clearer when you added that
11:18:08 15 last zero on to the "199".

16 THE WITNESS: Oh, okay, your Honour.

17 MR GRIFFITHS:

18 Q. Yes, could you sign and date it, please, Mr Taylor.

19 Mr Taylor, before we leave this photograph, can I just ask you
11:18:38 20 about one little detail. The individual we can see in the
21 background of the photograph, was that head wear a feature of the
22 uniform worn by NPFL soldiers?

23 A. NPFL soldiers did not wear a uniform. Depending on how
24 they wanted to dress, no, that is not a unified action on their
11:19:09 25 part. This guy has on red. Somebody could have on black. No,
26 there is not a unified set of situations, no.

27 MR GRIFFITHS: Thank you. Yes, could we have that marked
28 for identification, please.

29 PRESIDING JUDGE: Yes, that is the photograph catalogued

1 DP8. It will be marked for identification MFI-9H.

2 MR GRIFFITHS: Thank you:

3 Q. Now our photograph DP9, Mr Taylor. We can see a date
4 bottom right, 21 April 1992. What is this occasion?

11:20:04 5 A. I am addressing - it has got to be a gathering at the
6 administrative building in Gbarnga city.

7 Q. And can you help us as to the significance, if any, of this
8 occasion?

9 A. Oh, this - April. This could be one of any number of
11:20:45 10 things. Probably the - maybe citizens coming to meet with me. I
11 don't quite recall the specific event, but because it is in the
12 administrative building - what the administrative headquarters in
13 Gbarnga is is a big hall where important meetings are held. This
14 could have been a political gathering or maybe representatives
11:21:21 15 other parts of the country coming in to see me. Remember now, we
16 are already operating as a government by this time, so I can't
17 recall, in all frankness, the specific occasion. But this must
18 be important for me to be at the administrative building.

19 Q. How can you tell it is the administrative building?

11:21:45 20 A. I can tell from the flags, the background. This is the
21 background of the official sitting position in the administrative
22 building.

23 Q. Very well. And the gentleman whose head we can just see to
24 your left in the photograph, can you help us as to who that is?

11:22:03 25 A. No, I don't want to speculate. I could speculate, but I
26 don't think that is helpful to the Court.

27 Q. No, I don't want you to speculate.

28 A. I don't know. I can't --

29 Q. Right, Mr Taylor, could you then write on that photograph

1 "Photograph taken at administrative building in Gbarnga" and then
2 sign and date it.

3 Yes, could I ask for that to be marked for identification,
4 please, Mr President?

11:24:22 5 PRESIDING JUDGE: Yes, that photograph that has been
6 catalogued DP9 by the Defence will be marked for identification
7 MFI-91.

8 MR GRIFFITHS: Now, maybe someone with better eyesight than
9 mine can try and make out what the date is in the bottom
10 right-hand corner of this one:

11:24:49 11 Q. Can you help us, Mr Taylor, as to the date of this
12 photograph?

13 A. Yes, the writing is a little blurry here, but the occasion
14 must be around 1995, so this date must be around 1995. It looks
15 like a "5". Yes, it is around 1995.

16 Q. And what is the occasion?

17 A. I am now on the Council of State. This has to be late
18 1995, and this is a trip that I undertake to Conakry, Guinea.
19 The gentleman standing here with the cap is the late President of
11:26:06 20 Guinea, Lansana Conte.

21 Q. Okay, so let's write that in.

22 A. You want me to write his name, right?

23 Q. Yes, please, with an arrow. Do you have a date, your
24 Honour?

11:26:27 25 JUDGE DOHERTY: I am thinking it is 12/4/95, 4 December
26 1995, but my eyesight is not any better than anybody else's.

27 THE WITNESS: It looks like 1995. I agree with your Honour
28 it is 1995. And that 12, we have to look at that as the month,
29 December. So that is why I am saying this is late in 1995,

1 because I am already on the Council of State and that is around
2 August/September 1995, the Council of State, and then there is
3 this trip to Guinea late in 1995.

4 MR GRIFFITHS:

11:27:10 5 Okay. Well, let's write in the name of the gentleman you
6 are meeting, please, and could you give him his full title?

7 A. Yes.

8 Q. "The President of Guinea" and his name.

9 A. Yes.

11:27:59 10 Q. And because we can't be too specific, can we put "Date of
11 meeting late '95"?

12 A. Yes. You know, if you take a good look I would agree with
13 the Honourable Justice. That is - I can certify 12/4/95; would
14 that be okay?

11:28:28 15 Q. Yes, very well.

16 A. That looks like to the best of my --

17 Q. So 4 December 1995?

18 A. Yes.

19 Q. Can you help us with anybody else in that photograph?

11:28:46 20 A. Yes, I am here. Standing here is the head of my Secret
21 Service group, Colonel Charles Kollie.

22 Q. Right. Could you write that name in, please, and could you
23 put beneath that his role?

24 A. Yes.

11:29:49 25 Q. And can we entitle this "Trip to Guinea", and you say by
26 this stage you were on the council of what?

27 A. State.

28 Q. So I think just to further assist us, "Trip to Guinea after
29 joined Council of State". And can we sign and date that. And I

1 note the call, so we are running out of time. So if we just sign
2 and date it now, and then we will mark it for identification when
3 we return after the short adjournment.

4 PRESIDING JUDGE: Well, I think we have got time to mark it
11:31:15 5 before we adjourn.

6 MR GRIFFITHS: Very well.

7 PRESIDING JUDGE: We will mark that photograph which has
8 been catalogued DP10 by the Defence MFI-9J. We will adjourn now
9 and we will resume at 12 o'clock.

11:31:39 10 [Break taken at 11.30 a.m.]

11 [Upon resuming at 12.00 p.m.]

12 MR GRIFFITHS:

13 Q. There is one final photograph I would like us to consider
14 in this bundle, please, Mr Taylor. It is the final photograph in
12:02:01 15 the bundle designated DP11. Now I think on this one, Mr Taylor,
16 the date is a lot clearer, 12/4/95.

17 A. That is correct.

18 Q. Where is this taken?

19 A. This is my - this is the visit to Conakry, Guinea.

12:02:46 20 Q. Is this the same visit as the previous photograph we were
21 shown?

22 A. That is correct.

23 Q. So this is the same visit to Guinea in December 1995?

24 A. That is correct.

12:02:59 25 Q. Now who do we see in this photograph?

26 A. I will start from my immediate left. I am here.

27 Q. Right, and let's go through the same procedure, please;
28 arrow and a name.

29 A. To my immediate left here is the President of Guinea,

1 Lansana Conte. To President Conte's immediate left here is a
2 member of the Council of State, Alhaji Kromah.

3 Q. Now, Mr Taylor, is this the same Alhaji Kromah of ULIMO-K?

4 A. Yes. This is Alhaji Kromah, the leader of ULIMO-K.

12:05:00 5 Q. And this is December 1995?

6 A. That is correct.

7 Q. Is the NPFL still fighting ULIMO-K at this time?

8 A. May I just remind the Court, no. December 1995, we have
9 now formed the Council of State, this collective presidency that

12:05:31 10 we spoke about. And you see here these are the members of that
11 Council of State that are visiting Conakry at the time.

12 Q. Now another little detail. Was there any family connection
13 between President Lansana Conte and Alhaji Kromah?

14 A. Not that I'm aware of. He considered Alhaji like his son.

12:06:06 15 Alhaji is Mandingo and he practically grew up in Guinea and so
16 they are very, very close. And in my testimony before this Court

17 I have said that General Conte assisted in the organisation of
18 forming ULIMO after it changed from the Movement For the

19 Redemption of Muslims to ULIMO before the initial attack. So to

12:06:45 20 the best of my recollection, they are just by virtue of being of
21 the same tribe and the fact that he grew up in Guinea for the
22 most part.

23 Q. Who else can we see in the photograph then, Mr Taylor?

24 A. The gentleman here is the other member of the council.

12:07:11 25 This is Dr George Boley. George Boley here is the leader of the
26 faction called the LPC, the Liberia Peace Council.

27 Q. Could you add that as well, please, for further reference.
28 "Leader LPC".

29 A. Would you like for me to add that for Alhaji Kromah, what

1 he represented?

2 Q. Yes, please. Okay. Anybody else that you can assist us
3 with?

12:08:20

4 A. Yes. The gentleman here is - when we go to the Council of
5 State I have the appointment of the minister of foreign affairs
6 from the NPFL side. This is my foreign minister, Momodu Sirleaf.
7 He is the foreign minister for the NPFL. Well, excuse me, I'm
8 sorry. Not just the NPFL. He's now the foreign minister of the
9 entire government, but he comes from the side of the NPFL. He is
10 the foreign minister of the National Transitional Government.

12:08:49

11 Q. Can we write that in there, please.

12 A. Yes, Momodu Sirleaf.

13 Q. And his area of responsibility?

14 A. Yes, foreign minister.

12:09:41

15 Q. Anybody else?

16 A. Yes, I recognise the gentleman standing here is the Guinean
17 ambassador accredited near the Capital of Monrovia. I tell you,
18 your Honours, I don't remember his name.

19 Q. Just put in his title.

12:10:10

20 JUDGE SEBUTINDE: What do you mean, "accredited near the
21 capital"?

22 THE WITNESS: He is the Guinean ambassador, your Honour.
23 We normally say accredited near the capital. That's the
24 diplomatic explanation we all learn.

12:10:49

25 MR GRIFFITHS:

26 Q. Anybody else, Mr Taylor?

27 A. Yes. Yes. The gentleman right here is the brother of
28 Alhaji Kromah, who is the finance minister appointed by Kromah
29 for the entire government. He is Lansana Kromah. He is late

1 now.

2 Q. Anybody else?

3 A. Yes. This person right here, I'll put an arrow straight
4 down to him, right here, he is my - he now becomes the chief of
12:12:27 5 protocol from the NPFL side. He is Musa Cisse, chief of
6 protocol. He is with me, NPFL.

7 Q. Anybody else?

8 A. No, these are the individuals that I can really - I'm
9 really certain of. I can see in the back some soldiers, but
12:13:08 10 these are Guinean soldiers. I don't know them.

11 Q. All right. Let's put a title to this. So this is "Meeting
12 of council with Lansana Conte in Guinea," yes, Mr Taylor?

13 A. Can I - that sounds good to me. But meeting of the
14 council, this is not the entire council, so --

12:13:46 15 Q. "Meeting of council members with" --

16 A. Okay, very good.

17 Q. Could you put that title on there, please?

18 A. Yes, that's fair enough.

19 MR GRIFFITHS: Could I ask that that be marked for
12:15:11 20 identification, please, Mr President.

21 PRESIDING JUDGE: Yes, that photograph bearing defence
22 number DP11 will be marked for identification MFI-9K.

23 MR GRIFFITHS:

24 Q. Mr Taylor, now that we've gone through those photographs
12:15:29 25 covering the period from 1991 to 1995 - I wonder if you can move
26 back to the other seat, please. Yes, now that we've covered that
27 period from about the early 1990s through to 1995, December,
28 through those photographs, can you assist us any further as to
29 that period?

1 A. Well, if we go back to 1991, I think it's important to draw
2 the Court's attention to something there because this goes to the
3 - part of the heart of the Prosecution's case where the RUF
4 attacks Sierra Leone somewhere in March of 1991. That very month
12:16:53 5 I am extraordinarily busy. If you recall from the photos here I
6 visited Senegal, meeting with United States officials and meeting
7 with the President of Senegal. And may I just add that these are
8 not - and I'm sure - I don't want to sound like I'm just going
9 along, but these meetings take time to prepare. It's not just a
12:17:29 10 one day situation, get up, oh I'm going to Senegal and I'm going
11 to meet this. Especially when you're talking about United States
12 government officials coming, they are long planners, they plan
13 very long. I am doing everything that I can. I know the NPFL -
14 by 1991 it's very clear to me, and I guess almost everyone else,
12:17:56 15 that the intent here is for the NPFL not to take power by force
16 of arms. And if you see what we are embarking upon at this time,
17 we are involved in the process of trying to secure peace. The
18 fact that all of these countries had come in, they had engaged in
19 this deceit and they had been bombing us left and right, it was
12:18:22 20 clear that we were never going to be permitted to take power. So
21 we were pursuing peace. If you look at that very month of March,
22 an ECOMOG contingent - and by the way, you have to visualise this
23 - that an ECOMOG official leaving Monrovia to come to Gbarnga, he
24 is not coming alone. He is not coming with one vehicle. He is
12:18:48 25 coming as a military officer probably looking at a hostile area.
26 All of this is going on and more. And the Prosecution has me
27 training and arming and engaging in the war in Sierra Leone and
28 transporting, as one of the witnesses said here, and I'm
29 referring to that famous witness that we can't call the number

1 who talks about me being - I'm supposed to be on a truck with
2 trucks coming and doing all this thing. It's just - it baffles
3 me. I just thought to - before we close this chapter, to bring
4 this to the attention of the Court. This is just incredible that
12:19:39 5 someone would be doing all of this and pressing, and probably
6 more, and I'm supposed to be hanging on trucks and moving arms
7 and ammunition to go and send one man to train people to invade
8 Sierra Leone. I just wanted to bring a point on this very
9 important month, that I don't know what's going on or what is
12:20:05 10 being planned. I have no idea at all. I am busy pursuing peace
11 because I recognise that I'm not going to take power by - through
12 the revolutionary process that we planned and I begin the process
13 of negotiating for peace. I just wanted to draw the Court's
14 attention to that. And the last is around 1994, when we
12:20:36 15 finally agree to these deployments of UN and other forces and we
16 get to accepting that peace must come and granting the
17 enforcement rights to ECOMOG to conduct - to carry out peace
18 enforcement. I think these are all very serious signs and, you
19 know, you tie in all of the different meetings and gatherings we
12:21:08 20 are - I am really pushing for peace because I am convinced that
21 with the peace process we could win and that's where I stopped as
22 far as between 1991 and 1994.

23 Q. Very well. Let's now move on to 1995, please. Now what
24 are the major events in 1995, Mr Taylor?

12:21:55 25 A. There are not too many. We have agreed that in order to
26 bring peace we have to go to Monrovia. I have mentioned to this
27 Court that after discussion with General Abacha we had agreed
28 that ECOMOG would be neutral and I would go to Monrovia, but that
29 agreement, the Cotonou that was qualified by Akosombo, did give a

1 time for the deployment - the deployment of the forces throughout
2 the country to enable the movement to Monrovia and that once that
3 was in place - I do not know why we put it that way, but it was
4 put that way - that the final ceasefire - mind you, deployment is
12:23:13 5 going on and I'm talking about ECOMOG forces. The final
6 ceasefire is supposed to be around August of 1995 that will cause
7 us then to move to Monrovia. And even though there is no
8 fighting it beats me now why we called that the final ceasefire,
9 but that's the case.

12:23:34 10 We then have - the map shown here earlier for disarmament
11 and demobilisation that we just saw at the early part of the
12 morning is a very good example of what the deployment of the
13 peacekeepers looked like from that period going into our going to
14 Monrovia. That is an exact - what you saw on that map that
12:24:14 15 delineated the different positions, that's the full deployment.
16 That is in place.

17 To prevent movements with arms in or out of your area of
18 control, in or out of the country, the ports, the airports, are
19 all controlled. Then in August of 1995, or thereabouts, all of
12:24:46 20 us had to assemble into Monrovia. Now, what do I mean by all of
21 us? All of the warring factional leaders had to now go to
22 Monrovia to sit on the Council of State.

23 Q. Can you give us a date in August?

24 A. The Council of State sits in September, to the best of my
12:25:05 25 recollection, of 1995. I go to Monrovia I would say middle to
26 late August 1995 finally. And we go to Monrovia, that is we I'm
27 talking about Alhaji Kromah who comes all the way from Voinjama.
28 Alhaji is using Voinjama as his headquarters I'm talking about
29 for ULIMO-K. I leave Gbarnga and so Alhaji actually, if I'm not

1 mistaken, he could have driven to Monrovia. I can't be too sure.
2 I drove from Gbarnga to Monrovia.

3 But there was something significant also that happened. An
4 added sense of security was put into place. Every factional
12:26:04 5 leader had assigned to them at least one company, a military
6 company of about a hundred and - I would call that a reduced
7 company of about 140 men. ECOMOG soldiers became the principal
8 bodyguard securities for the factional leaders. They took care
9 of your security. Your every move, ECOMOG soldiers were assigned
12:26:41 10 with you. If I went to Gbarnga, they were there. Wherever I
11 travelled.

12 In fact, the immediate aide-de-camp for each of the
13 factional leaders became - an ECOMOG officer became the
14 aide-de-camp of these leaders. We agreed to that and I think
12:26:58 15 this was an added thing put into place maybe to watch us to make
16 sure we didn't do anything wrong. So we had an aide-de-camp with
17 us and we had this company assigned to us in addition to our own
18 personal securities that were given a certain number of arms that
19 they could bear, but the majority were the ECOMOG people.

12:27:24 20 We moved to Monrovia in 1995 and we put the Council of
21 State together and --

22 Q. And can you help us, Mr Taylor. You've mentioned yourself
23 and Alhaji Kromah travelling from Gbarnga and Voinjama
24 respectively.

12:27:42 25 A. That is correct.

26 Q. Were there any other factional leaders who went to
27 Monrovia?

28 A. Well, yes, I did not say --

29 Q. Could you give us all their names, please.

1 A. Yes. Dr George Boley is resident in Monrovia. He is
2 conducting LPC from the barracks. By barracks I mean the Barclay
3 Training Centre. I had mentioned that the LPC was really, what,
4 just a regrouping of the Armed Forces of Liberia. Dr Boley is in
12:28:08 5 Monrovia, so he is already there. The other two members of the
6 council at that particular time were Oscar, as in regular Oscar,
7 Quiah and that's spelt Q-U-I-A-H. Oscar Quiah was on the
8 council.

9 Q. And who was he representing, if anyone?

12:28:33 10 A. Yes, Oscar Quiah represented what at that time we call the
11 civil society. He represented the civil society on the council.

12 Q. Anybody else?

13 A. Yes, the council was chaired by a former Professor Wilton,
14 that's W-I-L-T-O-N, Sankawolo and that's S-A-N-K-A-W-O-L-O.

12:29:07 15 Sankawolo.

16 MR GRIFFITHS: I'm told that name is already on the record,
17 your Honours.

18 THE WITNESS: But that's the correct spelling. It's
19 Sankawolo. S-A-N-K-A-W-O-L-O.

20 MR GRIFFITHS:

21 Q. Anybody else, Mr Taylor?

22 A. We also had during that particular time an old chief, Tamba
23 Tailor. We had an old chief on the council.

24 Q. Tamba?

12:29:33 25 A. Tailor. Not as in T-A-Y-L-O-R. It's T-A-I-L-O-R. It's
26 Tamba D Tailor.

27 Q. So help us, what was the purpose of this Council of State?

28 A. The Council of State was the collective presidency of
29 Liberia. Throughout the crisis all of us had found out that

1 no-one wanted to give way to leadership and so the best thing was
2 to make everybody President at that time until we went into
3 elections. So the Council of State was what we call the
4 collective presidency of the principal parties sitting around one
12:30:27 5 table and mapping out what we wanted to do, putting in a
6 mechanism to proceed and have general elections in the country.

7 Q. Now, you tell us that you had moved to Monrovia in August
8 of 1995.

9 A. That is correct.

12:30:54 10 Q. So what had been going on in the preceding seven months in
11 Liberia?

12 A. We have the deployments going on.

13 Q. Deployment of whom?

14 A. Of the ECOMOG and United Nations forces. They're going on.

12:31:17 15 Government is still functioning. Don't forget now, there is a
16 council sitting in Monrovia with our representatives on them and
17 so there is that council. We are now going in to put in what we
18 call the real council, replacing our representatives and
19 representing ourselves - and being there ourselves.

12:31:35 20 So within those months really it's just, you know, the
21 preparatory stages and individuals are trying to tie up all of
22 their loose ends. So the first half of that time is really
23 putting things into place, because there are little squabbles
24 here and there trying to determine who will be where, defining
12:32:00 25 lines of demarcation between factions. It is mostly military in
26 trying to get everything what I will call squeaky clean before we
27 move to Monrovia.

28 Q. And is there any fighting going on in that period?

29 A. Not really, no. Maybe just little - little altercations

1 here and there, but nothing serious, no.

2 Q. So would this be fair, a fairly uneventful seven months or
3 so? Would that be a fair description of the first half of the
4 year, Mr Taylor?

12:32:45 5 A. Well, no, uneventful I would not say. For me it would be
6 eventful because that is probably the most important period,
7 because if anything goes wrong we - anyway, okay, I'll settle for
8 uneventful.

9 Q. Very well. So we're now in Monrovia and you're sitting on
12:33:04 10 the Council of State along with the others you've named.

11 A. Yes.

12 Q. Is it a successful combination?

13 A. We begin to get along. We are getting along, trying to
14 work things out, but we have a little disruption later on.

12:33:40 15 Throughout '95 we sit, we put the council together and we go to
16 Guinea. One of the reasons that we go to Guinea in December is
17 to really demonstrate that there is this so-called peace now on
18 the ground. I go because - even though it's a risk, because
19 Lansana has been - by that I mean Conte - had been helping
12:34:05 20 Kromah. That's Kromah's base. And for me to go to Guinea --

21 Q. This is December 1995?

22 A. In December 1995, yes. For me to go have even ventured I
23 mean, you know, that we are really talking some serious peace and
24 so we all go as a sign that, yes, the war is over.

12:34:34 25 So that ends 1995, but 1996 we are now on the council,
26 things are going well and we have a little problem at around
27 April. If you look here, ULIMO-J is not represented on the
28 Council of State. Alhaji Kromah is on the council representing
29 ULIMO, even though there is a ULIMO-J and they have split. So

1 there is some dissatisfaction going on.

2 Also you have the coalition. The coalition is not
3 represented on the Council of State. By coalition I explained
4 these are my former ministers that have put together this other
12:35:36 5 fighting force. So now you have the NPFL, the largest faction;
6 you have Kromah representing ULIMO; and Dr Boley, because most of
7 the LPC people are Armed Forces of Liberia people, he represents
8 them, the Armed Forces of Liberia and all of the little groupings
9 around them.

12:36:03 10 Now, Roosevelt Johnson is involved in an issue that
11 somebody gets killed in Monrovia. He is ordered arrested and --

12 Q. Who is ordered arrested?

13 A. Roosevelt Johnson is ordered arrested. He refuses, he
14 disrespects the Council of State and because we are the
12:36:31 15 government we decide to arrest Roosevelt Johnson.

16 Q. Pause there, please, Mr Taylor. What had he done to
17 justify his arrest?

18 A. He had killed someone. He killed a civilian.

19 Q. Had he done that personally, or one of the members of
12:36:49 20 ULIMO-J?

21 A. Well, it was alleged, and this is a matter that had gone to
22 the courts, that he had ordered the execution of a civilian, and
23 so the courts had ordered he be arrested. He said he would not
24 be. So the presidency had to take a decision, because in fact it
12:37:12 25 is the executive that executes the orders of courts. So we then
26 decided to arrest him by force, and that resulted into a major
27 fracas in Monrovia. This is around, August, I would say - around
28 April, I mean, of 1996.

29 Q. When you say a major fracas, what are you talking about?

1 A. War. Serious war. Roosevelt Johnson and the LPC people
2 came on one side, the NPFL and ULIMO-K took the other side, and
3 there was a major war in Monrovia. A major war that almost
4 caused the peace process to break down.

12:38:07 5 Q. How long did that last?

6 A. That lasted up until - I would say until about July or
7 thereabouts. About two or three months. Everybody left Monrovia
8 except the chairman of the council and myself. Alhaji Kromah
9 left. He went to, I think, Guinea. Boley left. I remained in
10 town, and after a long conversation with President Abacha there
11 was a ceasefire and everybody returned, and we pulled back our
12 forces out of Monrovia.

12:38:42

13 Q. So were the NPFL involved in that fighting?

12:39:08

14 A. Yes. The NPFL and ULIMO-K on one side, Roosevelt Johnson,
15 ULIMO-J and the LPC on the other side, along with the AFL and all
16 of that.

17 Q. So you made common cause with your former enemy Alhaji
18 Kromah?

12:39:26

19 A. Well, I had already made common cause when I decided to sit
20 with them on the Council of State, so yes.

21 Q. Was this fighting limited to Monrovia?

22 A. Yes, this was strictly in Monrovia. It did not spread
23 throughout the country, no.

12:39:48

24 Q. And did you have to order your forces from NPFL territory
25 into Monrovia?

26 A. Yes. We had to do that - there's a little point here I
27 would like to make sure that the Court will understand. I have
28 said that ULIMO-J, LPC, the Armed Forces of Liberia, we are
29 talking the same people. Their headquarter is actually in the

1 city of Monrovia at the Barclay Training Centre. ULIMO-J has its
2 sub-headquarters in an area called Bomi Hills that we've talked
3 about. So the war starts and they have all of their men in the
4 city. We have come to Monrovia with only our security being with
12:40:48 5 us. A war breaks out, and the entire weight of ULIMO-J and the
6 Armed Forces of Liberia are now bearing down on us. So the only
7 thing we can do is to bring in our forces to combat them. ECOMOG
8 is in Monrovia. To a great extent ECOMOG provides assistance to
9 the Council of State because, let me just clarify this, this is
12:41:18 10 not Taylor and Kromah planning to arrest Johnson; it's a decision
11 by the presidency. Because we are the real - we have the forces,
12 we have to now act, I mean, for and on behalf of the Council of
13 State. And so my forces are just outside of Monrovia in the
14 Harbel area where I have an entire marine division in that
12:41:46 15 general area, and so I bring down several battalions of marines
16 to secure the city, which they in fact practically do before a
17 ceasefire is called.

18 Q. Now what happened to Roosevelt Johnson as a result of this
19 fighting?

12:42:11 20 A. Roosevelt Johnson is not arrested. He takes refuge with -
21 if I'm not mistaken, I think with the Catholic Archdiocese at
22 that time. At a subsequent time he takes refuge at another
23 place. And once there's a ceasefire, we then agree to - that all
24 forces should pull back out of the city. We do, and then things
12:42:43 25 return to normal. He comes back to where he lives on an area of
26 Monrovia we call Camp Johnson Road.

27 Q. So on which side of the conflict would Varmuyan Sheriff have
28 been on, Mr Taylor?

29 A. Sheriff would have been on the side of Kromah, Alhaji

1 Kromah.

2 Q. And at that time did the name Abu Keita mean anything to
3 you?

4 A. Absolutely nothing. The principal commanders for ULIMO at
12:43:36 5 the time was not a Keita, people like those, but there was a
6 gentleman called Dumbuya. He was the commander, but Varmuyan was
7 a senior commander of ULIMO at the time.

8 Q. But at that stage ULIMO-J was the enemy, in effect, is that
9 right?

12:44:07 10 A. I wouldn't put it --

11 Q. During that conflict.

12 A. I wouldn't put it that way. The enemy was Roosevelt
13 Johnson. I want to put it that way. The enemy was Roosevelt
14 Johnson. This was not a factional war but, rightly so, he was
12:44:26 15 backed by ULIMO-J, but we did not go after ULIMO-J, we went to
16 arrest Johnson Roosevelt.

17 Q. Now what were the consequences in terms of the
18 infrastructure of Monrovia as a result of this conflict,
19 Mr Taylor?

12:44:45 20 A. Not very much destruction. The battle finally settled in
21 and around the Barclay Training Centre where Roosevelt Johnson,
22 the LPC people all - after we had routed them from the entire
23 city of Monrovia, they've settled in the barracks and we had to
24 stop the fighting because they did something very - well,
12:45:19 25 depending on how you look at it, smart or cruel. By this time
26 all of the families of the soldiers almost in Monrovia had all
27 come to the barracks. So you had military people and you had all
28 of their families; women, children, everything in the barracks.
29 It became a - I mean, a sea of humanity. And so once they

1 assembled there, I ordered a ceasefire upon the request of the
2 then I think chairman of ECOWAS, Sani Abacha, because we could no
3 longer attack the barracks because of the presence of the
4 civilians that had come into the barracks.

12:46:07 5 Q. So that's April, and you say that situation continued until
6 when?

7 A. I would say on and around June/July it was all over.

8 Q. And what about the rest of 1995, how do things progress?

9 A. I think around August/September just another little
12:46:32 10 incident. I am - an assassination attempt is made against me in
11 the Executive Mansion.

12 Q. Which year?

13 A. We're talking '96. It's '96 now. We're still in '96.
14 This fracas that I just explained is '96. I'm attacked on the
12:46:55 15 sixth floor of the Executive Mansion. I lose several of my
16 security personnel. In fact, the ECOMOG aide-de-camp captain
17 with me is hit and is seriously injured and several of my people
18 are killed, but I am not hit. And that caused another little
19 problem, but it was brought under control immediately when I
12:47:34 20 rushed from the mansion to the radio station and announced that
21 everything should be calm, that I was okay, and everything
22 stopped.

23 Q. What was the nationality of your - of the ECOMOG officer
24 who was seriously injured?

12:47:52 25 A. Nigerian.

26 Q. What was his name?

27 A. I can only remember his first name. He was a military
28 captain, he was Ali. I don't remember Ali's last name. He was
29 hit very seriously, but subsequent to that he was flown out to

1 Nigeria for military treatment, and in fact on a subsequent visit
2 I made to Nigeria I asked President Abacha to give him special
3 recognition, and that was done for bravery.

4 Q. And this attack took place where?

12:48:38 5 A. Inside the Executive Mansion on the sixth floor near my
6 offices.

7 Q. And who carried out the attack?

8 A. That attack was carried out by a combination of the ULIMO-J
9 and LPC people.

12:48:58 10 Q. How do you know that?

11 A. Well, a couple of the individuals that were arrested and
12 identified by ECOMOG were from the LPC faction.

13 Q. And what happened to them?

14 A. They were, I think, put in jail and I think they were tried
12:49:28 15 and - but eventually it didn't - it didn't go too far. It was
16 just a factional situation and they went to court, and I don't
17 think they stayed in jail very long.

18 Q. And when in '96 did this occur, Mr Taylor?

19 A. That attack on me is close to September. On the front end
12:49:53 20 of September. Late August/September of '96.

21 JUDGE SEBUTINDE: Mr Griffiths, I assume this is the
22 Executive Mansion in Monrovia.

23 THE WITNESS: In Monrovia. That is correct, your Honour.

24 MR GRIFFITHS:

12:50:11 25 Q. Now is there anything else of note that occurs in the
26 remainder of 1996, Mr Taylor?

27 A. Oh, yes. Following all of these little squabbles things
28 returned to normal and as you will, you know, rightly know there
29 is pressure now mounting. The peace agreement must be put into

1 place and we are nearing the area of time now that must - that we
2 must begin to deal with disarmament.

3 So by the end of '96 going to '97 we begin seriously moving
4 into the area of disarmament, because according - if I remember
12:51:11 5 very well, according to the schedule of implementation all
6 factions had to be disbanded by January of 1997. So we are all
7 now pushing, trying to make sure that we can begin this process
8 of getting the men into the centres to begin the disarmament
9 process. So this is what is going on within I would say the last
12:51:48 10 quarter of 1996.

11 Q. Now help us, Mr Taylor. In 1996, do you recall who was the
12 US ambassador to the United Nations?

13 A. Yes.

14 Q. Who was it?

12:52:02 15 A. The ambassador to the United Nations was Marilyn Albright.

16 Q. Marilyn?

17 A. Well, I sorry. I may be calling her - it may not be like
18 in Marilyn Monroe, but we call her Marilyn Albright. I may be
19 calling it wrongly, but it's Ms Albright.

12:52:31 20 MR GRIFFITHS: I don't know if this is a matter in issue,
21 because it's a publicly known figure?

22 THE WITNESS: Yes, she was UN ambassador at the time. She
23 subsequently became secretary of state of the United States.

24 MR GRIFFITHS: I'm enquiring whether the first name is in
12:52:46 25 issue, because I would like to have the proper name on the
26 record?

27 PRESIDING JUDGE: Ms Hollis?

28 MS HOLLIS: No, it is not.

29 MR GRIFFITHS: Madeline Albright.

1 THE WITNESS: Madel ei ne, sorry.

2 MR GRIFFITHS: The Madel ei ne is spelled M-A-D-E-L-E-I-N-E
3 and Al bright is A-L-B-R-I-G-H-T:

12:53:26

4 Q. Did you have cause to meet with her in that year,
5 Mr Taylor?

6 A. Yes, Ms Al bright vi si ted the Council of State.

7 Q. When?

8 A. In 1996.

9 Q. What part of 1996?

12:53:37

10 A. I would say not later than October. It had to be
11 September/October 1996, not later than that, she visited with us
12 in her capacity as US ambassador of the United States to the
13 United Nations.

14 Q. And how did the meeting go?

12:54:09

15 A. Well, the meeting was typical of I'll call it the
16 comportmentation of Ambassador Al bright. She in her normal style
17 was very straightforward, very brisk in her what I will call
18 explanation to the council. In typical form she lectured us.

19 Q. About what?

12:54:47

20 A. Peace and the need to return to a normal situation. And I
21 call it a lecture because Ambassador Al bright, like I said, did
22 not mince words. She was very, very upfront with her language to
23 us. Not anything abusive, no, but in a very what we call - she
24 delivered a very strong diplomatic lecture to us. I didn't like
25 it.

12:55:20

26 Q. Why?

27 A. Because I felt that Ambassador Al bright, representing her
28 government and coming and meeting what we call the collective
29 presidency, should have been a little more diplomatic in her

1 I language and so I responded.

2 Q. And said what?

3 A. And said to her that I took issue with the way she had
4 addressed us, that we were not a bunch of little boys, we did not
12:55:53 5 stay with her and that in fact she owed us an apology and we
6 would inform her government that it was unacceptable.

7 Q. What was her reaction to that?

8 A. We did not get in cross words. She understood. You know,
9 in diplomacy you express yourself and the other side express and
12:56:12 10 then you leave it just like that. We did not get into an
11 argument, there were no insults, but there were just tough words.
12 She understood and she said that she had delivered what she had
13 come to deliver and the meeting - in fact other members of the
14 Council of State, I don't want to comment for them, they made
12:56:32 15 some observations too, but I was just as forthright as she was.

16 Q. Did you tell us when this occurred, this meeting,
17 Mr Taylor?

18 A. Yes, I said in 1996.

19 Q. What time in 1996?

12:56:51 20 A. I told you round about - it had to be not later than
21 October, or thereabouts, in 1996.

22 Q. Now we have now, in traversing a number of years, been
23 concentrating in the main on Liberia. I'd like us now to pause,
24 please, and look at what's happening in the sister country of
12:57:18 25 Sierra Leone during that same period. Do you follow me?

26 A. I do.

27 Q. Now remind us, when had you last had dealings with Foday
28 Sankoh?

29 A. My last dealing with Foday Sankoh was way back in 1992.

1 Q. And starting from then help us, what was your knowledge at
2 the time of events in Sierra Leone starting from that point?

3 A. Are you referring to 1996?

4 Q. 1992. Let's start then and move forward to '96.

12:58:08 5 A. I did not care. I didn't have any - I really wouldn't have
6 cared about what was going on in Sierra Leone. I was busy doing
7 my peace and trying to establish government and governance, so
8 the only time between that period in question that Sierra Leone
9 came into focus for me and the council was in 1996.

12:58:41 10 Q. Well let us just have a little look at that period then,
11 shall we? Now, were you aware of an event in April 1992 when
12 President Joseph Momoh was ousted in a military coup led by
13 Captain Valentine Strasser?

14 A. Yes, that was public information. Yes.

12:59:24 15 Q. And did you appreciate what had prompted that event?

16 A. Well as far as appreciating the question, did I appreciate
17 what had prompted that event, for me what had happened in Sierra
18 Leone with Strasser coming from being an ECOMOG soldier and
19 overthrowing Momoh, that was just another event in Sierra Leone
12:59:56 20 for me. I mean it did not claim the type of attention that one
21 would, you know, make a major issue of.

22 Q. What about the position of the RUF in 1992 after you'd
23 stopped speaking to Foday Sankoh? What did you know about that,
24 Mr Taylor?

13:00:35 25 A. We cut off relationship May 1992 and withdraw our people
26 from Sierra Leone. Really we are not - because we have cut off
27 from Sierra Leone, we do not know from a realistic standpoint
28 what's actually happening behind the line. And I'm saying not
29 until 1996, but between '92/'93 of course you hear on the news

1 about fighting in Sierra Leone, but you are not in touch with it
2 because - I mean, if you look through all of the sequence of our
3 agreements and travelling in and travelling out and putting
4 together peace and trying to establish governance on our part, I
13:01:28 5 mean I'm not preoccupied with Sierra Leone. I have no reason to
6 be.

7 Q. Well, evidence has been placed before this Court that
8 during this period, late '92/'93, the RUF are effectively on the
9 run and are forced back into their jungle hideouts. Were you
13:01:51 10 aware of that?

11 A. I was not aware of their jungle hideouts, or what they were
12 in. You would get news reports of the fighting in Sierra Leone,
13 but I had no reason to be concerned about what they were doing
14 there because once my people were out of Sierra Leone I'm busy
13:02:12 15 with ULIMO on my back trying to capture not just Lofa, but trying
16 to move into Bong County and cross the St Paul River. I don't
17 really care about what's happening in Sierra Leone. I have no
18 reason to be.

19 Q. Now in 1996, early 1996, we're told that there is an
13:02:48 20 operation occurring in Sierra Leone called Operation Stop
21 Elections. Did you order the RUF to mount such a campaign,
22 Mr Taylor?

23 A. I did not order the RUF to carry out any such campaign. I
24 could have never ordered such a thing. I did not care about what
13:03:15 25 was going on in Sierra Leone. And don't let's forget that 1994
26 that you are talking about, what is happening on our side in
27 1994.

28 Q. I'm talking about 1996.

29 A. 1996 we are preparing for what? Disarmament. We are

1 preparing for disarmament in 1996, okay, to begin to put our
2 government into place. There is nothing that I have to do -
3 people that I have cut off relationship with since 1992, what
4 business is it of mine to - how do I order? What am I - how do I
13:03:58 5 do that? I'm supposed to be, what, on what, telephone, radio?

6 Look, I had nothing to do with the RUF after the break up
7 in 1992. I don't care about how it is twisted. I don't care how
8 it is patched. It's a lie. I had nothing to do with these
9 people. In 1996, on the Council of State, there are some
13:04:42 10 instances where the RUF comes in into picture in 1996 while I'm
11 on the Council of State, but other than that I know nothing about
12 what happened there and wouldn't have cared less.

13 Q. Now let's just examine it a little bit further, Mr Taylor.
14 Remind us, please, what are you doing in early 1996?

13:05:08 15 A. I'm already a member of the Council of State.

16 Q. Pause there. And what are you trying to achieve as a
17 member of that council?

18 A. I'm trying to achieve peace.

19 Q. Leading to what?

13:05:24 20 A. General and special elections in Liberia.

21 Q. To elect whom?

22 A. A President of the Republic of Liberia.

23 Q. And what kind of election are we talking about?

24 A. We are talking about an election that is planned,
13:05:47 25 supervised and carried out by the international community.

26 Q. And help us, what advantage could you have gained from
27 advising, or instructing, or inciting, or whatever, the RUF to
28 stop elections in Sierra Leone? What was in it for you?

29 A. Absolutely nothing.

1 Q. Because help us, was there a consequence in terms of
2 Liberia of the continued conflict in Sierra Leone?

3 A. Oh, definitely. Definitely.

4 Q. What was that?

13:06:27 5 A. It was very clear to me - with my presidential ambitions it
6 was very clear to me that, unless there was peace in Sierra
7 Leone, no matter what we did in Liberia it would never fully come
8 to where it should have come to because of crisis in Sierra
9 Leone. So it was very, very clear that everything on the
10 Liberian side was being done for peace, but that in our minds we
11 all knew that Sierra Leone had to have peace also or there would
12 not be anything in Liberia.

13 Q. Now as a consequence of the war and the continued war in
14 Sierra Leone, had any Sierra Leoneans been displaced into
15 Liberia?

16 A. Oh, yes. Yes. In fact, by this time there are
17 approximately 260,000 Sierra Leoneans that are in Liberia.

18 Q. Now help us, Mr Taylor. Did the council of which you were
19 a member have the finances to look after these displaced
20 individuals?

21 A. Oh, no, no, no, no, no. We did not have. It was a major
22 humanitarian question for the international community and so all
23 of the different segments of international assistance are poured
24 into Liberia. Let me explain that. Once it was clear to the
25 international community that peace was about to come to Liberia,
26 everybody moved in. The NGOs were in. The International
27 Committee of the Red Cross had moved its - I mean had major
28 offices in Liberia. Different electoral systems representing the
29 European Union. We have - there is a group connected with the

1 United States State Department, it's called IFES. I think it's
2 the International Foundation for Electoral Systems. It's called
3 IFES. They are there. The Carter Centre people have put in
4 their preliminary people. This is the period that things are
13:09:23 5 being built up in preparation for where we are going. And at
6 this time even with these numbers of people, the Medecins Sans
7 Frontieres, the World Food Programme, we cannot afford them and
8 so all of these agencies pour in to give assistance.

9 Q. So I'm asking you again, Mr Taylor, what was in it for you
13:09:53 10 to stop elections in Sierra Leone?

11 A. Absolutely nothing. I mean, I would gain nothing. In fact
12 I would lose, because if there is no peace in Sierra Leone I was
13 almost sure I would be elected in Liberia. I was rushing trying
14 to get the electoral process. There is nothing to be gained by
13:10:18 15 even being involved in trying to make trouble in Sierra Leone.
16 Absolutely nothing.

17 Q. And you've told us about events in Liberia beginning in
18 April involving a war in Monrovia --

19 A. That is correct.

13:10:29 20 Q. -- which lasts until when?

21 A. Around July.

22 Q. Now during that period, April, May, June, July, four months
23 in 1996, help us, what were you as a council member concentrating
24 on during that period?

13:10:48 25 A. I'm concentrating on getting this war stopped. I the
26 largest faction in Monrovia, I have mentioned to this Court,
27 Kromah flees Monrovia, he runs and everybody else - I am with the
28 largest army now that has to move into Monrovia to put this
29 trouble under control. In fact, it so bad that the chairman of

1 the Council of State has to move to my residence as a means of
2 protection. I am busy trying to stop this war, because the more
3 time we spent with this the electoral date that had been set in
4 the Cotonou Agreement and the schedule for implementation we were
13:11:34 5 falling aside. So I am busy trying to get this war stopped as
6 quickly as possible so we can move back to the peace process.

7 Q. And then, as you've told us, shortly thereafter there was
8 an assassination attempt on you?

9 A. That is correct. That is correct, with several of my
13:11:55 10 people killed in the Executive Mansion building.

11 Q. But, Mr Taylor, it's suggested that during this time you're
12 actually running the RUF next door and trying to stop elections?

13 A. Probably one day they will suggest I can fly, but I cannot
14 fly. This is total nonsense. I am not interested in Sierra
13:12:14 15 Leone. I don't know, maybe one day I don't know what else will
16 come up. I am not interested. I am fighting and I am busy
17 trying - it is very clear to everyone that Taylor could be the
18 next President. Every day that I spent away from that schedule
19 of implementation I am prolonging the crisis in Liberia. I'm
13:12:40 20 doing everything that I can.

21 I tell you, I get on the phone and I'm speaking to in fact
22 Sani Abacha. I can remember - and as I'm speaking about it now
23 we may have to get the records, because my statement will be on
24 the records - I did an interview with CNN, and I think that that
13:13:05 25 interview was done by I think Rosemary Church is the name during
26 that particular time, and I'm still emphasising the importance of
27 this thing stopping. I had tried to stop the attack on the
28 barracks. I get on the phone with General Abacha and I say,
29 "Listen". I mean he says, "What we can do then?" I said,

1 "There's nothing. What we have to do is to get this thing
2 stopped." I said, "Well, what I'll do is I'll declare a
3 unilateral ceasefire."

4 So the chairman of the Council of State then - and I'm
13:13:44 5 saying I because the chairman of the Council of State, Professor
6 Sankawolo, he is a professor and he comes on as the neutral
7 person and so really he depends on us for his security. So after
8 it was clear that this had to be - Professor Sankawolo announced
9 that there would be a ceasefire, a ceasefire took place and
13:14:05 10 everybody started withdrawing from the city, I ordered my men
11 back into the Harbel area and they withdrew.

12 So I am very, very, very much occupied with what is going
13 on at that particular time in Liberia and trying to do the best
14 that I can to keep the schedule of implementation under control.
13:14:31 15 And also don't forget there is an international pressure. Every
16 major government with interests in Liberia is calling for - well,
17 you know, there is international pressure.

18 Q. In any event, Mr Taylor, we know these facts have been
19 established that in January of 1996 Valentine Strasser is ousted
13:15:01 20 from power in a military coup and thereafter in February of 1996
21 Tejan Kabbah is elected President of Sierra Leone. Did you
22 follow that electoral process in Sierra Leone?

23 A. No, I did not follow it.

24 Q. Were you aware that he had been elected President?

13:15:23 25 A. Thereafter the winner, yes, I was aware that Kabbah had
26 been elected.

27 Q. Now help us, as the newly elected President of a sister
28 country did you have contact with him as one of the joint
29 Presidents on this Council of State?

1 A. No, I did not have contact, but - and in any case such
2 contacts would have had to be by and through the chairman of the
3 council, but as a government as normal procedure the chairman
4 through the council would send messages of felicitation to the
13:16:17 5 new President, but as chairman that would be his own act.

6 Q. But you personally had no contact?

7 A. No, not at all.

8 Q. Now, also we know that in November of 1996 peace talks are
9 being conducted in Abidjan involving the RUF and Tejan Kabbah's
13:16:47 10 government. Now help us, did you have any involvement in that?

11 A. No, I did not have any involvement in that. I knew of the
12 meeting.

13 Q. Were you advising the RUF to attend?

14 A. No, no, no, no, no. Not at all, no. I know of the meeting
13:17:11 15 because the Ivorian government had to request flying over - I
16 mean what they call flyover rights, a permission may I say, for
17 them to move Foday Sankoh from wherever he was, and that matter
18 came to the council to grant flying rights for this peace talk.

19 That's how I got to know that this was going on. Those flying
13:17:44 20 rights were provided and we were told that in fact it was a

21 helicopter and we were told that on board that helicopter would
22 be the Ivorian foreign minister at the time by the name of Amara
23 Essy, that's A-M-A-R-A and the Essy I think is I-S-S-A or E-Y. He
24 would be on board that helicopter that would fly over Liberia
13:18:14 25 into Sierra Leone to pick up Foday Sankoh and his delegation. I
26 know of the meeting, but had nothing to do with what they were
27 going to do. Nothing. I know of the meeting, yes.

28 Q. Did the NPFL, of which you were still leader, have any
29 representatives or advisers at those talks?

1 A. No, no, no, none whatsoever. None whatsoever, no.

2 Q. Did the Liberian government, of which you were then a part,
3 have representatives or anyone there?

4 A. No, the Liberian government did not participate at all.

13:18:57 5 Q. And November 1996, Mr Taylor, how long after the
6 assassination attempt upon you?

7 A. I beg your pardon?

8 Q. How long after the assassination attempt upon you, November
9 1996?

13:19:16 10 A. We are just talking about, what, in the vicinity of an
11 about a month or so.

12 MR GRIFFITHS: A spelling, Mr President. Amara Essy is
13 A-M-A-R-A E-S-S-Y.

14 PRESIDING JUDGE: Thank you.

15 MR GRIFFITHS:

16 Q. Now you appreciate, do you not, Mr Taylor, that this date
17 of 30 November 1996 has some significance? You know that, don't
18 you?

19 A. 30 November 1996?

13:20:02 20 Q. The Abidjan Peace Accord is signed, yes?

21 A. Uh-huh.

22 Q. Also start of the indictment period, yes?

23 A. Yes.

24 Q. Now, what knowledge did you have at the time of this accord
13:20:28 25 signed in Abidjan?

26 A. Look, every accord that is signed, to cut matters right to
27 the bone, if I or the Government of Liberia, all of those that
28 are observers to these negotiations sign on them. If you get the
29 Abidjan Accord and look on it, you will get to know who

1 participated and who didn't. It was announced that an accord had
2 been signed between - in fact, if I remember this very well, it
3 was between the RUF and President Tejan Kabbah in Ia Cote
4 d'Ivoire.

13:21:24 5 We on the council at that time, hearing that, was also
6 concerned about another little matter that had come out of Sierra
7 Leone. A bunch of Sierra Leoneans had burst through an area of
8 the country called Mano River and a large military contingent of
9 the RUF during this same time had burst into Liberia and the
10 council was also concerned with that matter at the time, but not
11 with the negotiations in Abidjan. That was the only thing that
12 we had to be concerned with at the particular time.

13 Q. Help us with some more details about that, please. First
14 of all, a date, roughly?

13:22:12 15 A. This is - I would just put it to the last quarter. I
16 remember a report came to the Council of State that there was
17 heavy fighting in Sierra Leone and that a large number of armed
18 Sierra Leonean soldiers had come into Liberia through the Mano
19 River area and down into - and they were intercepted by ECOMOG
20 and the ULIMO-K forces in that section of the country.

13:22:44 21 Q. Pause there, Mr Taylor. I wonder if the witness could be
22 shown, please, the coloured map of Liberia. Just help us,
23 please. Where had this incursion occurred, Mr Taylor?

24 A. Somewhere around the Camp Alpha-Kongo corridor. They
13:24:07 25 entered through here, they were intercepted, they were disarmed
26 and brought all the way inland to the town of Bopolu. There were
27 many of them. There were a few hundred I would say soldiers and
28 civilians that had come in and they - and this is the incursion.

29 By incursion let me just say, this was not an attack on

1 Liberia. They had come under attack and this is the famous
2 attack that we've heard about here in evidence, the famous Zogoda
3 attack that drove these soldiers into Liberia. They were
4 disarmed and turned over to the International Committee of the
13:25:03 5 Red Cross. They supervised this whole thing, granted them
6 refugee status with cards and that was the only thing that we
7 were concerned with with what was happening in Sierra Leone in
8 that period.

9 We were not concerned with the peace negotiations in
13:25:18 10 Abidjan. We had nothing to do with it. Our only preoccupation
11 during this very period was this influx of soldiers and civilians
12 that had come in and how the Red Cross would deal with them.

13 Q. Now help us, that incursion, which side of the conflict in
14 Sierra Leone were they on?

13:25:40 15 A. These were RUF individuals.

16 Q. And you're on the Council of State at the time?

17 A. That is correct.

18 Q. So were you dealing with this issue as an individual or as
19 a member of the council?

13:26:01 20 A. Well, this was a matter for the chairman of the council.
21 This matter came before us as a council. The report was made to
22 us in council meeting. The chairman, as would be his job, took
23 over immediately and coordinated with the ECOMOG commander and
24 with the different international organisations based on a
13:26:28 25 decision of the council.

26 And I like that question because I'll tell you this much:
27 We, by virtue of allowing a chairman to chair the council meant
28 that in fact we did give away some of our rights. By saying the
29 collective presidency didn't mean that we would just override

1 this man who chaired the council. He even for foreign - official
2 foreign visits representing the Republic of Liberia at that time
3 the chairman of the council would go or he could designate
4 someone, but that chairperson, that chairmanship, represented in
13:27:12 5 fact the actual leadership at that particular time. So this
6 became the matters that the chairman dealt with as chairman of
7 the council and coordinated what needed to be done to these
8 people.

9 Q. Mr Taylor, I want to press you a little further on this.

13:27:32 10 Now help us, that area where the incursion took place, who was in
11 control of it?

12 A. It was --

13 Q. Which faction?

14 A. ULIMO-K was in charge of that area.

13:27:47 15 Q. Was it an NPFL held area?

16 A. No, no, no, no, no, no. That's Lower - that's Lower Lofa.
17 That's ULIMO-K. In fact, the ULIMO-K soldiers with the ECOMOG
18 people were the ones that intercepted them.

19 Q. And of course we saw a UN security report as to who was in
13:28:11 20 control of that area.

21 A. That is correct, yes.

22 Q. So help us, was this a case then of the RUF flocking to
23 their brothers the NPFL for assistance?

24 A. Well, no. If we look at the cut off of the period from
13:28:34 25 1992, if we had to use the terminology "brother", their closest
26 brothers there would have been ULIMO because they had been doing
27 business with ULIMO even longer than they had with us. So this
28 is not the case. This is a desperate case of people running for
29 their lives and came in the country because they had nowhere to

1 go. Like I said, this is that famous Zogoda situation and people
2 are killed and they are actually running for their lives and when
3 they get into Liberia they actually surrender and are disarmed.

13:29:16 4 Q. But, Mr Taylor, several Prosecution witnesses, including,
5 I'm reliably informed by Mr Anyah, TF1-360, appear to suggest
6 that this was a movement from one brother to another for
7 assistance. What do you say about that?

8 A. I say this witness - and if I recall there was both a he
9 and a she and we can't talk about it, they are protected. They
13:29:39 10 are talking really nonsense. And I'm talking about this very
11 wicked woman and we all know who we're talking about. If you
12 wanted to come so, quote unquote, to a brother you would have
13 gone to Gbarnga. That's where the NPFL had its headquarters.

14 These are desperate people that were running for their
13:30:01 15 lives and ran - and I tell you what, if you look at this there is
16 evidence before this Court that within the period that there was
17 no contact with the NPFL, that there was cooperation between
18 ULIMO-K and the RUF and they bought arms and ammunition from some
19 of these ULIMO people on the border. In fact one witness
13:30:33 20 specifically states that Sam Bockarie had come and made
21 arrangements with the ULIMO people up in Foya.

22 So these people that are in this area, if it's anything the
23 RUF knows who is in that area and maybe that's why they broke
24 through to come here. These are desperate people, they get
13:30:58 25 there. They don't exchange fire with the ULIMO people. The
26 ULIMO people intercept them with ECOMOG and bring them forward
27 and they are all disarmed.

28 Q. Who by?

29 A. By ECOMOG.

1 Q. And what happens to them thereafter?

2 A. They are given refugee status cards by the International
3 Committee of the Red Cross. They are given refugee status and
4 they scatter in Liberia.

13:31:24 5 PRESIDING JUDGE: We'll have to leave it there for now,
6 Mr Griffiths. We'll adjourn for lunch and resume at 2.30.

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

8 [Upon resuming at 2.32 p.m.]

9 PRESIDING JUDGE: Yes, Mr Griffiths.

14:32:32 10 MR GRIFFITHS: May it please your Honours:

11 Q. Before we adjourned for lunch, Mr Taylor, we were dealing
12 with that incident when there was an incursion of RUF combatants
13 with their families into Liberia, okay?

14 A. Uh-huh.

14:32:54 15 Q. And you told us that they were given refugee status cards
16 by the International Committee of the Red Cross?

17 A. That is correct.

18 Q. And thereafter what happened to them?

19 A. I really don't know. They just - once they were given
14:33:17 20 status, they just spread in the country. I don't know where they
21 went, but they just spread over and I guess tried to make life
22 the best way they could.

23 Q. Now you have heard Prosecution witnesses speak of this
24 incident, haven't you?

14:33:35 25 A. Yes, I have.

26 Q. And did you, as a member of the Council of State, have any
27 dealings with any of those who entered during that incident?

28 A. None whatsoever.

29 Q. Do you recall one of those witnesses speaking of obtaining

1 funds to travel elsewhere?

2 A. Yes, I do. I do remember, which is a lie, but I think one
3 of the things that in fact I wanted to raise to your knowledge
4 here is that just before we broke I have been fighting to

14:34:35 5 describe people that I - I don't know how the record is showing
6 these people that I'm describing, your Honour. I don't know -
7 I'm about to describe somebody else whose name we cannot call,
8 they are protected, and so I don't know what the record is
9 reflecting of what I'm saying. I described a woman that I termed
14:34:54 10 a wicked woman. I don't know if anybody knows who she is, so for
11 me it's a difficulty that we could work out something that when I
12 refer to a witness that we could - I mean, it's a matter of their
13 credibility too and so, you know, I don't know. I'm about to
14 describe somebody else here.

14:35:10 15 MR GRIFFITHS: Well what I suggest, if it meets with the
16 Court's approval, is that perhaps one way around this particular
17 conundrum is for the witness to write down the name of the person
18 he is referring to and that perhaps we time and date that
19 document so that the record will in due course reflect precisely
14:35:33 20 which witness he was talking about, whilst at the same time
21 guarding the identity of the individual. I don't know if that
22 meets with the approval the Court. It would then be made a
23 confidential exhibit, of course.

24 PRESIDING JUDGE: I've probably missed something,
14:35:52 25 Mr Griffiths, but to what end would that serve, writing down the
26 name of a witness?

27 MR GRIFFITHS: So that we would all know precisely who
28 Mr Taylor was talking about.

29 PRESIDING JUDGE: When he is referring to that wicked

1 woman?

2 MR GRIFFITHS: Yes. And I'm going on to deal with another
3 witness whose name cannot be made public and, just so that we all
4 know who he is talking about, it seems to us that perhaps he
14:36:20 5 ought to write the name down.

6 PRESIDING JUDGE: Do you have any objections to that
7 procedure?

8 MS HOLLIS: It's our understanding that CMS does have the
9 ability on their screen to put the time and so there would be a
14:36:36 10 reference and then the Court would know to whom the witness is
11 referring, so perhaps it would be helpful to your Honours and if
12 it was confidential it would then protect the individual witness
13 as well.

14 PRESIDING JUDGE: That's confused the matter even more for
14:36:59 15 me, I'm afraid.

16 MS HOLLIS: Defence counsel had said that there would be a
17 procedure whereby when he wrote down a name there could be a time
18 and perhaps a page or a line from the transcript that could be
19 associated with that particular name so that then when we looked
14:37:19 20 at the record, you would know to what he was referring. That's
21 what I understood Defence counsel to be saying.

22 MR GRIFFITHS: Precisely.

23 MS HOLLIS: It's a bit complex, but it seems to me that if
24 that could be done that would be a workable solution should your
14:37:38 25 Honours want that. That's all I was saying. We would have no
26 objection to that procedure if your Honours found it helpful.

27 PRESIDING JUDGE: I understand now. Thank you, Ms Hollis.
28 That procedure will be satisfactory, Mr Griffiths. It will be a
29 confidential exhibit, of course.

1 MR GRIFFITHS: Mr President, it may be that we might not
2 even have to engage CMS with a time and date, because of course
3 each document will be given an MFI number and so that reference
4 alone should suffice to identify the particular individual.

14:39:08 5 PRESIDING JUDGE: I think it will, yes.

6 MR GRIFFITHS:

7 Q. Bearing that in mind, Mr Taylor, do you have some paper in
8 front of you?

9 A. I have already written on these so I would ask for --

14:39:30 10 Q. First of all, who is the wicked woman you were talking
11 about? And could you sign and date that, please. I wonder if
12 that could be shown first to me and then counsel.

13 PRESIDING JUDGE: Do you want to see it first,
14 Mr Griffiths?

14:40:16 15 MR GRIFFITHS: I would like to see it first, please. I'm
16 going to ask that that be marked for identification.

17 PRESIDING JUDGE: I can mark that, or I'm not sure whether
18 Ms Hollis would object to it being given a confidential exhibit
19 number now.

14:41:46 20 MS HOLLIS: No, Mr President, we would not object to that.

21 PRESIDING JUDGE: Thank you, Ms Hollis. That can be given
22 an exhibit number. We will put it straight into evidence and
23 mark it confidential. Madam Court Manager, what's the next
24 Defence exhibit number?

14:42:14 25 MS IRURA: Your Honour, it's D-89.

26 PRESIDING JUDGE: That piece of paper then will be admitted
27 into evidence as D-89, Defence exhibit D-89, and it will be
28 marked and treated as confidential.

29 [Exhibit D-89 admitted]

1 MR GRIFFITHS: I'm grateful, Mr President:

2 Q. Mr Taylor, do you recall another witness suggesting the
3 receipt of monies at the time of this incident from a Liberian
4 official?

14:43:08 5 A. That is correct. I do. I do.

6 Q. Again, in order that we know what we're talking about,
7 could you write that person's name down for us?

8 A. Should I sign and date it also?

9 Q. Yes, please. Thank you. I take it we will adopt the same
14:44:44 10 procedure in relation to this document, Mr President?

11 PRESIDING JUDGE: I can't see why you would object to that,
12 Ms Hollis, but it's certainly --

13 MS HOLLIS: No objection.

14 PRESIDING JUDGE: Thank you. We'll make that last piece of
14:45:02 15 paper Defence exhibit D-90.

16 MR GRIFFITHS: I'm grateful.

17 PRESIDING JUDGE: That will also be marked and treated as
18 confidential.

19 [Exhibit D-90 admitted]

14:45:12 20 MR GRIFFITHS:

21 Q. Now, Mr Taylor, do you know about the payment of any monies
22 to that individual?

23 A. None whatsoever. In fact, based on my recollection of the
24 evidence given by that individual, the name that he called

14:45:39 25 happens to have been a deputy minister or another official in the
26 Council of State government. Now, I just want to lay certain
27 foundation here for the judges to understand. We've been talking
28 about this government, and as we progress it will be important
29 for the Court to know what is this council. Yes, we've described

1 the Council of State, but we haven't got into the composition,
2 because what he said is a lie and the individual that he is
3 talking about represented ULIMO-K in that government.

4 The government was set up in this way: The ministries were
14:46:47 5 divided based on the size of the faction. You did not totally
6 control an entire ministry on your own. I had the largest
7 faction so I had the largest number of ministers. Now, where one
8 faction would have the minister, the immediate deputy would go to
9 another faction and the other deputy will go to the other faction
14:47:08 10 and that's how it was divided. And the assistant ministerial
11 positions went to the civil society groups and whatnot. So in
12 his testimony the individual that he mentioned actually
13 represented ULIMO-K in the government.

14 Q. And that person who represented ULIMO-K, who was that?

14:47:37 15 A. I've forgotten the gentleman's name. I researched it.
16 It's in the record. He called his name, but even to call it now
17 not - depending on what the Court feels, that may even go back
18 into the - by calling that name somebody could track it and for
19 the protection of that person - but the name is mentioned in the
14:47:59 20 records.

21 Q. Very well. The fundamental point in relation to that,
22 Mr Taylor, is what?

23 A. That he lied.

24 Q. What are you saying about the testimony of that individual?

14:48:13 25 A. That he lied. And if we begin to look at some of the
26 little things. Here we are. No witness, to the best of my
27 recollection, has come before this Court and said, "Okay, between
28 '92 and on, oh, we were sending people to Mr Taylor. We wrote,
29 we did this and that". If you look at it very, very, very

1 carefully, that particular period that we are talking about,
2 almost every witness before this Court has verified the fact that
3 contacts were cut off. Everybody said that. "Oh, we cut off
4 this contact as of 1992". Several Prosecution witnesses have
14:49:16 5 said that.

6 Now, that is a route between Sierra Leone, Guinea, people
7 want to Ghana where Sierra Leoneans normally go. We saw a
8 document here that was published out of Ghana. Then we see that
9 no witness has come here and said, "Well, you know, we sent a
14:49:40 10 delegation, because the road was blocked we passed through
11 Guinea, went through Ivory Coast and then we sent somebody down
12 to Monrovia to Mr Taylor, our brother". All we have this witness
13 saying is that he - well, why couldn't he, if he was coming to me
14 - why couldn't he come at no other time than the time he is
14:50:10 15 running for his life?

16 I mean, why - why is it you are in Zogoda and you know
17 there is supposed to be this Mr Taylor on the Council of State
18 that you can get to and he will help you. You don't come any
19 time between 1992. You are under attack all the way in 1996 and
20 then you say, "Oh, well, we are going to Mr Taylor". But within
21 that period you as a senior officer, why don't you try to find a
22 way inside to Taylor? You can only come when you are under
23 attack? It's a lie.

24 And these little lies are just so simple and they just
14:50:58 25 cloud up the whole - this whole indictment thing, it just makes
26 it look so - I mean - but I guess it must be that. These people
27 don't get to me at any time but finally after thousands of them
28 escape for their lives and there's - the record before this Court
29 is replete with the problems at Zogoda, all of a sudden he comes

1 and he goes to an official and he is inferring - it's a lie.
2 That's all it is.

3 Q. Whilst we're on the question of that individual, I wonder
4 if we could see, please, Prosecution exhibit 54 to begin with.

14:51:56 5 MS IRURA: Your Honour, I would require some time to locate
6 the documents.

7 PRESIDING JUDGE: I am sorry, I didn't hear what you said
8 then.

9 MR GRIFFITHS: I apologise for not having given Madam Court
14:54:19 10 Manager more extensive warning.

11 PRESIDING JUDGE: Well perhaps you can remember that in
12 future, Mr Griffiths, but another matter regarding exhibit P-54
13 is I'm told that it bears the name of two protected witnesses on
14 the chart and so that's something --

14:54:41 15 MR GRIFFITHS: I'll have to bear in mind in dealing with
16 it.

17 PRESIDING JUDGE: Yes, we won't be able to put it on the
18 screen. Mr Griffiths, I was told that there were two protected
19 witnesses, but there is nothing from that chart that can tell who
14:56:27 20 is protected and who is a witness and who isn't.

21 MR GRIFFITHS: I think that's right. Through an excess of
22 caution what we could do is put part of a post-it sticker over
23 the TF1 number at the top.

24 PRESIDING JUDGE: I think, yes, that's a good idea.

14:57:59 25 MR GRIFFITHS:

26 Q. Now, Mr Taylor, assist us with this chart please. What can
27 you tell us about this?

28 A. Virtually nothing. This - I saw this chart presented by
29 the Prosecution with this witness. This doesn't reflect anything

1 even close to what the NPFL command structure was. Totally this
2 is nothing. This is really absolutely nothing.

3 Q. Well help me with this, first of all, then. Were you the
4 leader of the NPFL?

14:59:03 5 A. Yes, I was.

6 Q. So to that extent this is right?

7 A. That is correct.

8 Q. The Executive Mansion Guard was commanded by whom?

9 A. The Executive Mansion Guard was commanded by Michael
14:59:19 10 Paygar.

11 Q. Now, Mr Taylor, you note that at the top it is suggested by
12 this diagram that this is the command structure around about
13 1990/1991. Was Michael Paygar in charge of the Executive Mansion
14 Guard at that time?

14:59:50 15 A. Michael Paygar was in charge of the Executive Mansion Guard
16 in 1991, in 1992. The point I'm trying to make here - and it's
17 important for the Court - is the way how I learned charting,
18 where the lines take off from are also important as to where they
19 end. This structure as it laid we have to look at it in
15:00:17 20 different forms. If we are talking about positions, we can look
21 at it.

22 If we look at this chart that's what I meant by - I mean, I
23 would hate to really begin to comment on this chart that does not
24 reflect the position of the NPFL. So while it may be true that
15:00:34 25 people know names and put positions, where these lines are going
26 do not reflect the National Patriotic Front and I think it would
27 be a mistake for me to comment on this chart that really means
28 absolutely nothing and would distort the type of information that
29 you - that we are seeking to help the Court. That's the point

1 I'm trying to make.

2 So Michael Paygar is Executive Mansion Guard battalion
3 commander, but he does not come directly from the leader of the
4 NPFL. He comes further down. There is a defence ministry, there
15:01:09 5 are divisions and there are battalions. To connect a battalion
6 to the leader, I didn't command in the field. That's why we have
7 to be very careful with this chart. I do not want to comment on
8 this chart. This chart for me, as far as I'm concerned, is just
9 total foolishness.

15:01:26 10 Q. Well what I'm going to ask you to do in a moment then,
11 Mr Taylor, is for you to construct on a piece of paper what you
12 say the command structure was, but before we come to that I do
13 want to ask you about certain aspects of this document. You will
14 note that that individual suggests, according to this document,
15:01:57 15 that you had two military advisers, one of whom is said to be
16 Foday Sankoh. Is that true, or false?

17 A. Total false. That's what I'm saying. Total false. What
18 would Foday Sankoh be doing as a military adviser to me? I've
19 got 168 Special Forces. I've got Gambian - what would he be
15:02:30 20 doing? What advice can he give me? This is total nonsense. It
21 is not true.

22 Q. Now note this is 1990/1991, I will remind you. Was
23 Dr Manneh in Liberia at that time?

24 A. Dr Manneh arrived in Liberia in 1990, about the time that I
15:02:55 25 arrived. That's between around about April/May 1990.

26 Q. As far as you're aware, Mr Taylor, did Dr Manneh have any
27 military training?

28 A. Not at all, as far as I'm concerned, and that is why when
29 he arrived in Liberia he was sent to the city of Buchanan as I

1 have said in the records here and his job as an academic was to
2 go about instructing and teaching about the revolution. He is
3 not a military man. We've led revolutions. Like myself I have
4 never, ever taken any military training. I led a revolution.

15:03:46 5 Q. Very well. Having dealt with those two aspects, Mr Taylor,
6 I'm going to pause at this point and invite you, please, given
7 what you've said about this document, to write out on a piece of
8 paper what you say the command structure was of the NPFL.

9 A. It's going to take some time.

15:04:04 10 Q. Well, you're on trial on very grave charges, Mr Taylor, so
11 you take your time and map it out, please.

12 A. Okay. I have a rough one here now.

13 Q. Right. Can we replace the document currently on the
14 overhead projector with this document, please.

15:12:02 15 PRESIDING JUDGE: I think you perhaps ought to have a look
16 at it and check that there's nothing that is confidential on
17 there, Mr Griffiths.

18 MR GRIFFITHS: That's fine.

19 PRESIDING JUDGE: [Microphone not activated].

15:13:30 20 MR GRIFFITHS:

21 Q. Mr Taylor, I wonder if you could change places, please, and
22 just take a moment, please, to take us through the diagram you've
23 drawn. So I want you to start at the top.

24 A. Okay.

15:14:08 25 Q. Right. Now, what I would also like you to do, Mr Taylor,
26 to add a bit of flesh to the bones of that diagram, can I give
27 you a red pen because I would like you to add in the names of
28 certain individuals. Are you with me?

29 A. Yes, I am.

1 Q. Right. So at the top of the food chain, so to speak, is
2 the commander in chief. Who is that?

3 A. Do you want me to write the name?

4 Q. Yes, please.

15:14:51 5 PRESIDING JUDGE: Also, Mr Griffiths, I know you've already
6 reminded the witness of this, but it may be advisable to show on
7 that chart that this is the chain of command as at 1990 and 1991.

8 MR GRIFFITHS: Okay:

9 Q. Mr Taylor, put the red pen away for the minute, yes, and
15:15:17 10 take up the blue pen in which you drew this diagram and I would
11 like you to write in capitals across the top of it what you say
12 this diagram represents and when. Do you follow me?

13 A. Yes, I do.

14 Q. So if we could have a caption at the top, please. Right.
15:16:39 15 Now take up the red pen again, please.

16 A. Yes.

17 PRESIDING JUDGE: Just to make this clear, the Prosecution
18 exhibit P-54 that was shown to the accused covered the command
19 structure of the NPFL as at 1990 and 1991 and you subsequently
15:17:03 20 reminded Mr Taylor that the chart that he was preparing would
21 cover that period. And now we have the command structure shown
22 on Mr Taylor's version as being between 1990 and 1997. Is that
23 what you wanted, Mr Griffiths?

24 MR GRIFFITHS: Well, let me explore that point through the
15:17:27 25 witness in the hope of clarifying the situation:

26 Q. Mr Taylor, was this the position in 1990?

27 A. This is the command structure of the NPFL as it was laid
28 down and it never changed.

29 Q. That's the second point I was going to ask you. Did that

1 command structure remain constant from 1990 right the way through
2 to 1997?

3 A. This is the structure. It never changed.

4 Q. And why have you put the cut-off point of 1997?

15:18:06 5 A. That's the time of my election as President when the NPFL
6 no longer existed. In fact, as of January, if I can be more
7 specific, 1997 at the official time of the dissolution of the
8 NPFL.

9 Q. Right. Which then became what?

15:18:27 10 A. We established a political party and it became the National
11 Patriotic Party.

12 Q. Thank you. Now, who is minister of defence?

13 A. The minister of defence is Tom Woveiyu.

14 Q. Who is the international coordinator?

15:19:11 15 A. The international coordinator is Ellen Johnson-Sirleaf.

16 Q. And then beneath that we see the - what's that?

17 A. General commanding.

18 Q. And who is that?

19 A. That is Isaac Musa.

15:19:51 20 Q. Right. Then below that we see the marine division it. Who
21 commanded that division?

22 A. The marine division was commanded by Nixon Gaye.

23 Q. Next to that we see the strike force division. Who
24 commanded that?

15:20:25 25 A. The strike force was commanded by Anthony Mekunagbe.

26 Q. And the army division was commanded by whom?

27 A. Oliver Varney.

28 Q. Move it up a bit now, please. How many battalions were
29 there?

1 A. There were six battalions.

2 Q. Who commanded the 1st Battalion?

3 A. Quite frankly I do not remember. The battalions are at the
4 level where I would not know all of the battalion commanders.

15:21:46 5 This is a defence operation. The very large forces I'm aware
6 like the divisions, but the battalions, I very rarely know who
7 the battalion commanders are.

8 Q. Did you have any military advisers?

9 A. I had no military advisers. The ministry of defence was
15:22:16 10 there. There was several Special Forces there. I had no adviser
11 militarily, none.

12 Q. Is there anything else you want to add regarding this
13 document, Mr Taylor, the one you have constructed?

14 A. Yes, I would like to make one little clarification based on
15:22:52 15 what the President of the Court mentioned. That has to do with
16 the position of international coordinator. The personnel - the
17 position remained, but the personnel changed as we went along,
18 okay? But the position remained.

19 Q. Right. Now just so that we're clear about that, the person
15:23:20 20 named there, Ellen Johnson-Sirleaf, the current President of
21 Liberia --

22 A. Yes.

23 Q. -- at what stage was she the international coordinator?

24 A. She was international coordinator between 1986 - 1986
15:23:58 25 throughout to about, oh, I would say '94.

26 Q. Okay. Could you put those in brackets beside her name,
27 please. Was she succeeded by someone?

28 A. After she left we used different contacts, yes. She was
29 succeeded by someone.

1 Q. Who was that?

2 A. Do you want me to write in his name?

3 Q. Yes, please.

4 A. She was succeeded by Eric Scott from about 1994, when she
15:25:06 5 took over, to about 1995. He is late - he died - and we did not
6 replace him in that position.

7 Q. So do you regard this diagram now as being as complete as
8 you can recollect?

9 A. Yes. As far as the military command structure is
15:25:35 10 concerned, this structure is the structure and it did not change
11 until January of 1997.

12 Q. Now I wonder if you would mind signing that document,
13 please, and dating it. I don't know if anyone would like to
14 examine that document?

15:26:24 15 MS HOLLIS: We have no need to examine the document.

16 PRESIDING JUDGE: No, nobody needs to see it, Mr Griffiths.

17 MR GRIFFITHS: Very well. Can I ask that that then be
18 marked for identification MFI-10, I believe.

19 PRESIDING JUDGE: That is correct. The document just
15:26:45 20 prepared by the witness, being what he says is the command
21 structure of the NPFL from 1990 to 1997, will be marked for
22 identification as MFI-10.

23 MR GRIFFITHS: I'm grateful:

24 Q. Now, Mr Taylor, first of all can I have my pen back please.
15:27:07 25 Second of all can we put exhibit 54 back on the screen, please.

26 Now, Mr Taylor, we see on that diagram reference to Isaac Musa as
27 being battlefield commander. Was he?

28 A. No, we didn't use that battlefield. Isaac Musa was in
29 charge of thousands. He was what we called the general

1 commander. Not the commanding general. The general commanding
2 the army. That was Isaac Musa.

3 Q. And we see mention beneath the caption "Executive Mansion
4 Guards" of Benjamin Yeaten. Was he a member of the Executive
15:28:34 5 Mansion Guard?

6 A. No, at this particular time Benjamin Yeaten is not.
7 Michael Paygar is the commander and he is a Special Force. Under
8 him - under Michael Paygar - is not another Special Force, okay?
9 There are very trained junior individuals that are under this
15:28:58 10 particular commander. Benjamin Yeaten is not a part of the
11 Executive Mansion Guard in the period he is talking here, 1990.

12 Q. Was Benjamin Yeaten a Special Force?

13 A. Oh, yes. Yes.

14 Q. Now, I've already dealt with the reference to Foday Sankoh
15:29:24 15 and Dr Manneh. Now according to this there was a strike force
16 unit commanded by Sam Tuah, whose deputy commander was Charles
17 Timber. Is there any truth to that?

18 A. Let me just - there is no truth to this. Every - every -
19 division, every battalion and most expanded companies are
15:30:13 20 commanded by Special Force. Your Honours, there is no way. This
21 Charles Timber, or Sam Tuah, these are not Special Forces.
22 Your Honours, there is no-one other than the Special Force
23 commanding a major unit in the NPFL. No way. It's not possible.

24 Q. So were they Special Forces, Mr Taylor?

15:30:37 25 A. Sam Tuah is not a Special Force. According to the list
26 presented before this Court, if you go through that entire list
27 Sam Tuah is not on it and Charles Timber is not on it. They are
28 not Special Forces. They cannot command a strike force unit.
29 They cannot.

1 Q. Now we see next door to that in a box reference to the
2 Ghankay Tigers, SBUs. What about that, Mr Taylor?

3 A. Well, I think we know where this chart is coming from.
4 That's what they put on it. We don't have anything called

15:31:14 5 Ghankay Tigers, but I mean this is a Prosecution chart, isn't it?

6 Q. Was there ever in existence within the NPFL an SBU unit
7 called the Ghankay Tigers?

8 A. Never. There's never been, ever.

9 Q. Now, we see that beneath Isaac Musa is a battle group
10 commander who is said to be Sam Larto. What do you say about
11 that?

12 A. Well, let's just - since we're looking at this map, let's
13 look at up top we see "Battle Front Commander Isaac Musa" and we
14 see at the bottom "Battle Group Commander". Now, if there's
15 anybody here - and I'm sure the Court can get experts to look at
16 this. Which is the higher position, the battle front or the
17 battle group? How can - how can the battle front commander be at
18 the top and the battle group be at the bottom? So whoever put
19 this here with their military experience should even know better.

15:32:07 20 A battle group is what? When you say a battle front commander it
21 could be any - a battle group commander is of a higher command
22 structure than a battle front commander. This is a joke. This
23 map is a joke. How do you put a battle front commander --

24 Q. Battle field it is.

15:32:47 25 A. Field commander, okay, up here and then put the group down
26 here? I don't know where they got this from, but Sam Larto was
27 not any battle group commander. Sam Larto was a Special Force
28 and commanded a battalion I mean probably, because he did not
29 command a division, but he could not have been a battle group

1 commander because in instances where you have battle groups there
2 are three divisions in the NPFL. These divisions are divisions -
3 the NPFL divisions comprise a minimum of 10,000 men to be a
4 division. There were three divisions and we started building
15:33:32 5 these divisions. I do not claim that we had this quantity of men
6 by 1990. We set them up and we are building. So you cannot have
7 these divisions and then you have battle groups. I don't know.
8 It doesn't work that way.

9 Q. Now we see that underneath that reference is made to 1st,
15:34:04 10 2nd and 6th battalion and reference is made to other battalion
11 commanders. Now, we see within the box "1st Battalion Commander"
12 "Combat battalion capture of Monrovia". Help me, did the NPFL
13 ever capture Monrovia?

14 A. There's no evidence before this Court the National
15:34:34 15 Patriotic Front never captured Monrovia ever.

16 Q. And so help us, Mr Taylor. Did you assign your first
17 battalion to Monrovia?

18 A. The nearest unit of the National Patriotic Front to Liberia
19 I've said to this Court even during the morning was the marine
15:34:56 20 division located in Harbel.

21 Q. You said Liberia. What did you mean to say?

22 A. In the Republic of Liberia.

23 Q. Yes. Which one? Which battalion was closest to Monrovia?

24 A. To Monrovia is the marine division that was responsible for
15:35:13 25 the general Monrovia area.

26 Q. Then we see "2nd Battalion Commander Anthony Mekunagbe
27 based in Voinjama". Was Anthony Mekunagbe based in Voinjama?

28 A. Mekunagbe is the divisional commander and he is based in
29 Voinjama, but his area the divisional control includes Bong -

1 Bong County, where you have the seat of the NPFL. It includes
2 Lofa. That's why it is a division. It is a huge area. So from
3 Bong County all the way up to Lofa, all the way to the Sierra
4 Leonean border, is controlled by that division and he has
15:36:01 5 commanders assigned. In fact the principal training base for
6 this division, because it fell within his command area, is this
7 famous Camp Naama that we keep talking about. It fell within the
8 divisional confines of Anthony Mekunagbe.

9 Q. Now, it says that the 6th Battalion Commander was Oliver
15:36:30 10 Varney based in Bomi Hills. Was Oliver Varney the 6th Battalion
11 Commander?

12 A. No, Oliver Varney was a divisional commander responsible
13 for Cape Mount, Bomi and at that time that is mentioned on this
14 map Lower Lofa County. So that's a divisional area. He is a
15:36:54 15 divisional commander, not a battalion commander.

16 Q. Now we see that below them are two names, "Francis Menwon".
17 Do you know such an individual?

18 A. Oh, yes, I do.

19 Q. Was he a Special Force?

15:37:10 20 A. Oh, yes, he is a Special Force.

21 Q. Can you assist us with his area of responsibility?

22 A. Francis Menwon was more associated with the division
23 controlled by Anthony Mekunagbe. He is in this Bong/Lofa area.

24 Q. And One-Man-One, is that an alias familiar to you?

15:37:50 25 A. I'm not familiar with the alias One-Man-One, no.

26 Q. Sorry to trouble you, I wonder if we could just see the
27 bottom of the diagram so that we can complete this exercise and
28 move on. Now we see that beneath that battalion there is a box
29 which contains the caption, "Each battalion was further divided

1 into units, i.e. Military Police, combat units, SBUs. Unit
2 commanders reported to their deputy commander".

3 Now Mr Taylor, you notice that on the same level as the
4 battle group commander Sam Larto is that unit which supposedly
15:39:05 5 bears your middle name, the Ghankay Tigers, and it's said to be
6 an SBU. Do you see that?

7 A. Yes, I do.

8 Q. Do you see now that when we go down to the box to which
9 I've just referred, it appears to suggest that the SBUs come
15:39:23 10 under the battalion commanders. Do you follow me?

11 A. I follow you. I follow you.

12 Q. Can you assist us with that?

13 A. I'm afraid I can't because it doesn't make any sense to me.
14 I'm afraid I can't.

15:39:38 15 Q. Because given the scheme of this diagram, it suggests, does
16 it not, that the Ghankay Tigers are near the top of the
17 hierarchy. Is that the impression you gain, Mr Taylor?

18 A. Yes, but I - yes, I get that impression. I'll wait for the
19 other impressions, because if you look at this particular diagram
15:40:05 20 up here where you have a name Sam Tuah, for example, he is strike
21 force unit commander, then you have Ghankay Tigers. But when you
22 get down here they have what? What is Sam Tuah down here? He is
23 mentioned down here as what? Is he - you know, is he a
24 commander?

15:40:28 25 So this - I really - I can't help with this because I don't
26 know what - it doesn't make sense here what they are talking
27 about. "Each battalion further divided into units, military
28 police". The only way you break down a battalion from the little
29 that I learned in dealing with these, you break down a battalion

1 into companies. I don't know what other units and different
2 things and for those that are military people here, Military
3 Police units, they control the army. I'm not sure if they are
4 normally connected to battalions. So I'm sorry, I can't help the
15:41:16 5 Court.

6 Q. I wonder if you could hand me that document. I would like
7 to take it off the screen, please. The reason I want to take it
8 off the screen, I suddenly noticed something at the bottom of it.
9 But help me with this, please, Mr Taylor: Looking at the names
15:41:45 10 at the bottom of this diagram, is the name Mohamed Tarawalli
11 familiar to you?

12 A. I have heard that name in this courtroom.

13 Q. Did you ever come across such an individual in Libya?

14 A. Never. No.

15:42:06 15 Q. What about Rashid Mansaray?

16 A. I never came across him, no.

17 Q. At this time, 1990 to 1991, did the name Issa Sesay mean
18 anything to you?

19 A. Nothing whatsoever.

15:42:28 20 Q. What about Morris Kallon?

21 A. Nothing. Nothing. No.

22 Q. What about Peter Vandi?

23 A. No.

24 Q. Eldred Collins?

15:42:39 25 A. No.

26 Q. Isaac Mongor?

27 A. No.

28 Q. Augustine Gbao?

29 A. No.

1 Q. Dopoe Menkarzon?

2 A. Yes, he is one of my Special Forces.

3 Q. What about Sam Bockarie? Did you know that name in
4 1990/1991?

15:43:01 5 A. No.

6 Q. And that name you wrote on confidential exhibit D-90, you
7 know the second name you wrote down?

8 A. Yes, I do.

9 Q. Did you know that person in 1990/1991?

15:43:20 10 A. No.

11 Q. I wonder if we could put this document away now, please.

12 Then can we put this one, exhibit P-55, on the screen, please.

13 Now, again do you recall this diagram being placed before this

14 Court, Mr Taylor?

15:44:24 15 A. Yes, I do.

16 Q. And you will note that it's entitled "RUF command structure
17 after the invasion of Sierra Leone around March to June 1991".

18 Now, you see that you are placed there right at the top of the

19 hierarchical tree.

15:44:55 20 A. Yes.

21 Q. Were you?

22 A. No, not at all.

23 Q. And beneath you is said to be Isaac Musa. Is that true?

24 A. In the command structure of the NPFL even Isaac Musa was

15:45:09 25 not second in command. That's not true.

26 Q. And beneath him we have Sam Larto. What do you say about
27 that?

28 A. That's even a bigger lie. That's not true.

29 Q. And then we see on the next level of responsibility Oliver

1 Varney and Sam Tuah. Help us, was that the case?

2 A. According to this they are even higher than Foday Sankoh.

3 Q. We're coming to him. Can we move the diagram up a bit
4 more, please. Now, perhaps you can help us, Mr Taylor. We see

15:46:08 5 then beneath Oliver Varney and Sam Tuah three boxes; deputy
6 commander One-Man-One, an unnamed deputy commander, and then
7 appearing to float freely between the two is the leader
8 Foday Sankoh, number 1 in the RUF without one of those dark lines
9 linking him to anyone. Now, can you help us with that?

15:46:44 10 A. I'm sorry, I can't help you. This looks like - I mean, I
11 don't know how these things come about. As I'm looking at this,
12 somebody probably forgot - in this whole construct they just
13 forgot too many things. Now, if you look at this you have Rashid
14 Mansaray, who is supposed to be the second in command of the RUF
15:47:18 15 as mentioned in this Court. They have got even junior personnel
16 claiming from the NPFL to be even higher than him.

17 Sam Tuah, for example, I keep saying, he is not a Special
18 Force. He is higher than Rashid Mansaray. He is higher than
19 Mohamed Tarawali. I really don't know how they came up with
15:47:47 20 this map. I hope I could help.

21 For me, I would just say in maybe two words to describe
22 this map: Total foolishness. I have no knowledge. And for
23 someone, as I'm sure they ought to do what they have done, to
24 associate me as the leader - not now of just the NPFL but now I
15:48:17 25 am the leader of the RUF --

26 Q. Mr Taylor, please can we just see the top of the diagram
27 again, please. Remind us, please, where are you in March of
28 1991? You note it says, "Around March to June of 1991". Where
29 are you in March of 1991?

1 A. March of 1991, as I have been saying this morning, I take a
2 trip to Senegal. I come back to receive the ECOMOG commanders.
3 I'm very busy by that particular time.

15:50:06 4 Q. But according to this, you're running the RUF at the same
5 time, Mr Taylor. For four months, according to this, you are
6 running the RUF. What do you say to that?

7 A. You know, I just have to - there is no real good answer
8 except to say that this is foolishness because it would be
9 inappropriate to answer how I really feel inside.

15:50:53 10 MR GRIFFITHS: Can I have a moment just to make a note for
11 myself, Mr President. Thank you:

12 Q. Mr Taylor, I wonder if you would resume your seat, please,
13 and can we put that exhibit away. Now, Mr Taylor, what I would
14 like you to do now, please, is to have a look at Prosecution
15:52:09 15 exhibit 272. Now, your Honours have this document in typed form
16 identical behind that tab 5 in the additional documents for week
17 30. Do your Honours have that?

18 PRESIDING JUDGE: That's the document headed "Revolutionary
19 United Front of Sierra Leone"?

15:52:57 20 MR GRIFFITHS: Dated 4 December 1996.

21 PRESIDING JUDGE: Yes, we have it, thank you.

22 MR GRIFFITHS: I wonder if the witness can have in front of
23 him the typed copy whilst the handwritten original is available
24 on the screen:

15:53:40 25 Q. Now, Mr Taylor, you will recall that we have today
26 traversed your account up to the end of 1996, yes?

27 A. That is correct.

28 Q. You will note that we have now before us a document dated 4
29 December 1996.

1 A. Yes.

2 Q. Now this, then, would be four days after the signing of the
3 Abidjan Peace Accord in 1996, yes?

4 A. Yes.

15:54:23 5 Q. And we see that the document is headed "Revolutionary
6 United Front of Sierra Leone"?

7 A. Uh-huh.

8 Q. And it's from Corporal Foday S Sankoh?

9 A. Uh-huh.

15:54:42 10 Q. Who is in Abidjan, La Cote d'Ivoire, yes?

11 A. Yes.

12 Q. To Brother Mohamed Talibi of the People's Bureau of Libyan
13 Arab People's Jamahiriya in Accra, Ghana, yes?

14 A. Yes.

15:55:00 15 Q. Now I want us to look at this document together, please.
16 First of all, did you have any hand in the writing of this
17 document?

18 A. No.

19 Q. Now let us look at the contents, please:

15:55:26 20 "I received the USD 29,000 through Mr Daniel Kallon for
21 which I am very grateful to you and the other brothers back
22 home."

23 Now, Mr Taylor, were you in 1996 able to provide support of
24 that kind of magnitude to the RUF in Sierra Leone?

15:56:00 25 A. No, no.

26 Q. Were you aware, Mr Taylor, that an organisation which you
27 were supposedly commanding was receiving sums of this amount from
28 people - from other people based in Ghana?

29 A. I had no knowledge of any financial transactions regarding

1 the RUF. None.

2 Q. But, Mr Taylor, you are supposed to be running the RUF.

3 A. Yes.

4 Q. How come you don't know about this?

15:56:40 5 A. Well, you know, people go to any lengths to - to say what
6 they want to say. I really had nothing to do with these people
7 as of 1992, so this whole thing - of course, I mean I know it's a
8 logical question and if I were in control I sure would be asking
9 some questions. I had nothing to do with these people. Nothing.

15:57:03 10 Q. "We have signed the Peace Accord on November 29, 1996 just
11 so as to relieve our movement of the enormous pressure from the
12 International Community while I will use this opportunity to
13 transact my business in getting our fighting materials freely and
14 easily."

15:57:23 15 Now you will recall the evidence, Mr Taylor, that whilst in
16 Abidjan the Sierra Leonean army had managed to push the RUF out
17 of Camp Zogoda. You remember that?

18 A. Yes, I do.

19 Q. When they arrived in Liberia, as you told us, yes?

15:57:46 20 A. Yes.

21 Q. And we see here in the letter reference being made to
22 "enormous pressure", yes?

23 A. Yes.

24 Q. Now, it continues:

15:58:04 25 "I will use this opportunity to transact my business in
26 getting our fighting materials freely and easily.

27 I have already finished negotiations with my business
28 partners and I have so far paid USD 300,000."

29 Now were you Foday Sankoh's business partner, Mr Taylor?

1 A. No, not at all. No, no, no.

2 Q. But, Mr Taylor, you are said to have millions stashed away
3 somewhere. Was this an instalment from Foday Sankoh?

15:58:45

4 A. No. And those millions that they have talked about, they
5 will never be able to show them because they do not exist. No,
6 there's no connection here whatsoever. None.

7 Q. So who were the "business partners", plural note?

8 A. I have no idea whatsoever.

15:59:14

9 Q. "Our agreement is that they should receive USD 700,000
10 from me in Sierra Leone upon their arrival with the materials
11 into my controlled territory."

12 Mr Taylor, how are you allowing your subordinate to refer
13 to the controlled territory as his when you are in charge? Why
14 are you allowing this to happen?

15:59:34

15 A. I don't know what this man is talking about. This is
16 Foday Sankoh dealing with his problem in Libya - I mean, in
17 Abidjan. I have no idea what this is - what this is about.

15:59:57

18 Let me just remind the Court about this whole thing about
19 the contact. Remember this particular second name that I wrote
20 who said he came through and was given money, but mind you he
21 doesn't tell this Court that he was supposed to receive a message
22 from me to - he said that an official gave him money and he was
23 on his way, but if I'm sending you or have anything to do with it
24 am I not going to give you a message when you go tell him this or
16:00:20 25 that? So he takes off and he goes and so he knows his own way
26 and he knows his own message?

27 I have point blank nothing to do with these people at this
28 - as of 1992 whatsoever. There is bad blood between us. And
29 even there is further evidence in this Court even of movement

1 between Guinea, where one of the last witnesses that came through
2 here talked about how they got out through Guinea and how they
3 came back and were arrested by Sam Bockarie. I have in short
4 nothing - absolutely nothing - to do with these people. I do not
16:01:05 5 know what they are doing, how they are doing it and don't care.

6 1996, December. You watch this date. We are preparing in
7 Liberia for what? Disarmament. We're about to start disarmament
8 and we are preparing for me to go to elections, so I am so busy
9 and don't really care about what they are doing on their side and
16:01:28 10 know nothing about it.

11 Q. It continues, let us remind ourselves:

12 "Our agreement is that they should receive USD 700,000 from
13 me in Sierra Leone upon their arrival with the materials into my
14 controlled territory. The total cost of the material USD 2,
16:01:54 15 000,000. The balance amount will be paid when the operation is
16 completed.

17 I am therefore asking you and your brothers to urgently
18 provide the needed USD 700,000 so that I will be in a position to
19 live up to my commitment to my business partners who will be
16:02:10 20 coming very soon with these materials. As I have always learnt
21 from you people, there is some money with the Burkinagbe
22 government for the provision of our needed materials. But as you
23 might have known by now, that government have really not shown
24 any keen interest in assisting us as a movement. I even had
16:02:32 25 conversation with commandant Diendere these few days but with no
26 positive result."

27 Pause there. In 1996, Mr Taylor, who was the President of
28 Burkina Faso?

29 A. Blaise Compaore.

1 Q. In 1989 when your forces left Libya, where did they go to?

2 A. Burkina Faso.

3 Q. What was the nature of your relationship with Blaise
4 Compaore?

16:03:12 5 A. Blaise was and remains a very good friend of mine.

6 Q. In December of 1996, what was your relationship with Blaise
7 Compaore?

8 A. Blaise remained a friend of mine.

9 Q. So help us. We have here the leader of the RUF, an
16:03:35 10 organisation you are supposed to be running, saying in this
11 letter that "that government have really not shown any keen
12 interest in assisting us." So, Mr Taylor, why didn't you broker
13 some friendship between your underling Mr Foday Sankoh and your
14 good mate Blaise Compaore? Why?

16:04:00 15 A. Because there was no link to broker. There was no link to
16 broker and so we didn't have to broker, no.

17 Q. "I even had conversation with commandant Diendere these
18 few days but with no positive result.

19 I would therefore suggest that you prepare a letter for me
16:04:21 20 to meet President Compaore on this issue."

21 Pause again.

22 A. Yes.

23 Q. You are the leader. Can you help as to why he is writing
24 to a group of Libyans in Accra to write a letter to Blaise
16:04:39 25 Compaore when you are right next door able to help him? Can you
26 help us with that?

27 A. Yes, it's simple, because there is no connection and so
28 there's no link. There's just no connection. I don't know what
29 they are doing and we can see - let's not forget we are using

1 Accra here. We already have documents before this Court to show
2 that it appears from the statement made that was brought before
3 this Court that the RUF already have what? Some standing in
4 Accra. So you can see now that - I can see here now why he is
16:05:18 5 using the Accra bureau. So he has made his own - there is no
6 connection and so there's no links between he and myself any more
7 and he is out there struggling trying to make his own thing. So
8 there's just no link and so why come to me?

9 He can't get to me in the first place. There is no link.
16:05:40 10 Foday Sankoh is already angry because of the split ever since way
11 back between us when we withdrew our men and so there is just no
12 need. Why would you go to someone that you have no links with?
13 So he goes to who he is trying to establish his own links with.
14 That's all.

16:05:57 15 Q. Now bear in mind, of course, this December 1996 is of
16 significance because we're a month into the indictment period --

17 A. Uh-huh.

18 Q. -- when you're alleged to be in control of the RUF and its
19 activities. Were you in control of them, Mr Taylor?

16:06:26 20 A. I was not in control and never was in control of any of
21 these activities.

22 Q. Now let's continue:

23 "I would therefore suggest that you prepare a letter for me
24 to meet President Compaore on this issue, as we never received
16:06:47 25 anything from them and even my delegates at Ouagadougou have
26 returned ever since to my location here. Please advise on this
27 issue. When I went in last week I was able to organise serious
28 mining operations in precious minerals."

29 Pause again. Now, do you recall the evidence which was

1 placed before this Court that in order to further the cause of
2 peace in Abidjan, Foday Sankoh had been taken with other senior
3 RUF officials on a flying visit to the areas they controlled in
4 Sierra Leone. Do you remember that?

16:07:36 5 A. Yes, I do.

6 Q. And so that is the trip he makes to Sierra Leone and in
7 this letter dated 4 December, he is saying that:

8 "When I went in last week I was able to organise serious
9 mining operations in precious minerals, which I believe will help
10 us to generate the needed foreign exchange for our mission. For
11 now I am highly in need of the US \$700,000 in order to go in and
12 be waiting for the arrival of my business partners. Please help
13 me in this great hour of need and I promise not to let you down".
14 Then he mentions a name "...will give you the rest of my message.
15 My best regards to you and your family."

16:08:03 16 Now, December 1996, Mr Taylor, were you aware of an order
17 to increase mining operations in Sierra Leone?

18 A. No. I was not aware of that. But let's go back to the
19 paragraph just before the last one. And there's some logical
16:09:01 20 things that I just have to mention here.

21 This entire letter dealing with Burkina Faso, saying that
22 his delegation goes and does not see and returns. Somewhere in
23 this letter, knowing - knowing me, somewhere in this letter if
24 there was any contact one would expect that something should be
16:09:39 25 mentioned about me somewhere in this letter. Like, you know,
26 "We've contacted our brother Charles Taylor and we" - there's got
27 to be - I mean, you know, you cannot prove a negative.

28 There is no link so, you know, when you look at the whole
29 thing, you go to Burkina Faso and you cannot see anyone and you

1 return. It simply means that in my opinion here is a man trying
2 to operate on his own. There is no doubt in my mind that
3 Foday Sankoh knows that I'm friendly with Blaise Compaore. He
4 knows that. He knows that very, very, very well, okay. We've
16:10:22 5 been together for a few months. He knows that, okay. Back in
6 '91, '92, we had done some work on that border.

7 So for him to go on his own to Burkina Faso, get, you know,
8 slapped in the face, it simply means that this man is content on
9 operating on his own without my assistance, without my knowledge
16:10:48 10 and/or consent. In other words he is really saying, I mean, "I'm
11 on my own, I don't need Taylor", because somewhere somebody must
12 say in the back of his or her own mind why isn't Taylor even
13 mentioned here?

14 I mean you're in La Cote d'Ivoire. Here is this gentleman
16:11:09 15 who has come through. He's gone to you, who I'm supposed to give
16 money to to go that I didn't do. You can at least say I just
17 received one of my senior people that just came through Liberia
18 and I guess this man is really trying to demonstrate, and
19 rightfully so, that, "Look, I'm going to show Taylor that what
16:11:42 20 happened, I can do without him and I'm on my own". You know,
21 that's the only way I can put this.

22 It's very clear that these dealings, going to Burkina Faso,
23 failing, not mentioning - and there is not one document that I'm
24 aware of, and I stand corrected on this, besides the letter that
16:12:04 25 was done somewhere in I think May of 1991 about the five boxes or
26 so boxes of AK, and I stand corrected on this, I don't know of
27 any document presented before this Court of a letter again from
28 Foday Sankoh to me. I stand corrected on this. This man is just
29 demonstrating, "Listen, I'm on my own. I'm a man for myself".

1 And he's in fact ignoring - maybe he doesn't even want to hear
2 the name Taylor.

3 Q. Let's just look at another aspect of this, please,
4 Mr Taylor. In December 1996, what areas of Liberia do the NPFL
16:12:56 5 control?

6 A. By December of 1996 we are controlling Bong. We are
7 controlling part of Nimba.

8 Q. Which part?

9 A. That section of Nimba all the way up to about Tappita and
16:13:20 10 not beyond.

11 Q. Well, let's just look at the map briefly, please. It's an
12 important point so let's take our time. Just show us, please,
13 quickly, in December 1996 which parts of Liberia do the NPFL
14 control? You mentioned Bong.

16:14:15 15 A. We have Bong, that's right here. Right here, Bong.

16 Q. Yes. Where else do you have?

17 A. We have this section of Nimba County.

18 Q. Which section? Could you just trace the outlines of the
19 area of Nimba you are talking about?

16:14:28 20 A. I would put us - let me see. Here, this is Tappita here.
21 I would say this outline area coming this way into Margibi.

22 Q. And does that area go all the way up to the border with
23 Guinea and La Cote d'Ivoire?

24 A. This section here goes up to La Cote d'Ivoire here. It
16:14:57 25 goes all the way to the town of - that I mentioned, Loguato. I
26 found it the other day. Right here. It comes up - we are in
27 control here of Loguato, yes.

28 Q. What about that road which is leading just above where your
29 pen is at the moment? Did you control that?

1 A. Yekepa, we are controlling that. This is not a road into -
2 this is the famous LAMCO - these are all mountains here.

3 Q. So you are controlling an area which borders on the Cote
4 d'Ivoire?

16:15:37 5 A. That is correct.

6 Q. Go back to your seat, please. Now, look at the front of
7 the letter. Where is Foday Sankoh when he is writing this?

8 A. He is in Abidjan.

9 Q. Where is that?

16:16:01 10 A. La Cote d'Ivoire.

11 Q. And you're controlling part of Liberia which borders Cote
12 d'Ivoire?

13 A. That is correct.

14 Q. Would Foday Sankoh from Abidjan therefore have had access
16:16:20 15 to the area of Liberia controlled by you?

16 A. Evidently. Remember that the gentleman leaves Monrovia as
17 he's stated before this Court. The gentleman, I mean the name
18 that I wrote down, and he travels through Loguato into La Cote
19 d'Ivoire and then on to Abidjan. So if Foday Sankoh, while he
16:16:49 20 was in La Cote d'Ivoire, had any desire to get in touch with me,
21 he could have if he wanted to. He didn't. He could have. He
22 could have driven in. There's a road from La Cote d'Ivoire
23 straight to Monrovia.

24 Q. Yes. Can we put that document away now, please. I want to
16:17:43 25 use the remaining time, Mr Taylor, to clear up one or two matters
26 so that hopefully we can commence on 1997 first thing in the
27 morning. Now, you recall that it was alleged that you attended a
28 meeting along with Foday Sankoh, Dr Manneh and the individual who
29 you mentioned earlier to plan the two-pronged attack on

1 Sierra Leone? Do you remember that being said?

2 A. I remember that.

3 Q. And you recall it being said that that meeting took place
4 in March of 1991, and the transcript reference is page 2213, it's
16:18:55 5 sequential, dated 25 January 2008. It was also said that that
6 meeting took place in Voinjama. Were you in Voinjama in March of
7 1991?

8 A. No. No.

9 Q. When was the first time you went to Voinjama, Mr Taylor?

16:19:25 10 A. I went to Voinjama in late - very late of 1991.

11 Q. And let us just --

12 A. Months after I moved to Gbarnga.

13 Q. Now, another witness {redacted} on 2 July 2008,
14 transcript reference 12866 --

16:20:05 15 PRESIDING JUDGE: Yes?

16 MS HOLLIS: We need to redact that name that was given.

17 That is a protected witness.

18 PRESIDING JUDGE: I see.

19 MR GRIFFITHS: Would you give me a moment, please.

16:20:42 20 MS HOLLIS: And we would also ask that there be no
21 follow-up giving a TF number since we do have the name already.

22 PRESIDING JUDGE: All right. Thank you. It seems that
23 that was a protected witness you named, Mr Griffiths, and it
24 should be redacted from the record.

16:21:32 25 MR GRIFFITHS: I apologise for that, Mr President. I was
26 looking at a document that I had prepared and unfortunately I
27 hadn't reminded myself in the document as to the status of that
28 witness and I apologise for that.

29 PRESIDING JUDGE: All right. I notice that the previous

1 witness you mentioned you did not disclose any identifying
2 details at all.

3 MR GRIFFITHS: Because I made a clear reference on that
4 one, but it's my fault. I should have made a reference here.

16:22:00 5 PRESIDING JUDGE: I'm going to make a redaction order, but
6 perhaps you could treat this witness in the same way as you
7 treated the previous one that you referred to and not refer to a
8 name or pseudonym either, seeing the name's been mentioned, but
9 I'll order that the name of that person that was mentioned by
16:22:21 10 Defence counsel in reference to a July 2008 transcript be
11 redacted and order further that the members of the public in the
12 gallery do not repeat that name outside of this Court.

13 Go ahead, Mr Griffiths.

14 MR GRIFFITHS: Yes:

16:22:47 15 Q. Mr Taylor, do you recall some evidence heard by this Court
16 on 2 July 2008, transcript reference 12866, to the effect that in
17 late 1992 Foday Sankoh had gone to Liberia and met with his
18 brother, you Charles Taylor, and that Sankoh had given you some
19 diamonds to keep in exchange for ammunition, rice and salt? Do
16:23:30 20 you recall that evidence?

21 A. I recall that.

22 Q. In late 1992, did you have such contact with Foday Sankoh?

23 A. None whatsoever, but let's get into the whole logical
24 pattern of this whole bunch of deception that we have here before
16:23:53 25 this Court. Let's go back to the gentleman who said he was in a
26 meeting with me and Dr Manneh, planning the invasion of
27 Sierra Leone. That is similar to this other lie, that
28 Foday Sankoh was supposed to come in late 1992 to give me
29 diamonds.

1 Now here, if we look at it from a logical standpoint, a
2 plan is being made to invade a country. This individual, whose
3 name is written down, apparently is not a military personnel. He
4 is instructing. You've got Special Forces, Rashid Mansaray.
16:24:48 5 You've got Special Forces. They don't come. They don't come.
6 Here is the instructor who is teaching - I don't want to describe
7 him. I'm sure the Court knows. He comes.

8 I mean, these are the lies these boys make up. I don't
9 know how far they think they are going to get with it. Maybe
16:25:08 10 they have gotten along while I am in jail. I mean how do you -
11 what do you come to talk about if there is such a meeting?

12 Then we go to this other man about this diamond business.
13 Number 1, witness after witness have come to this Court and they
14 have said that contacts were cut off with the NPFL by 1992 and
16:25:39 15 most of them settled on May, which is true.

16 Now, where does this man pass with these diamonds in late
17 1992 to get to me? Does he fly with a helicopter? Where does he
18 pass? I mean, how does one - what road does he take to traverse
19 these diamonds to come to me in late 1992 when you know that
16:26:12 20 ULIMO has full control of Lofa, all the roads are cut, everything
21 is gone, there is no contact? And yet Prosecution witness after
22 Prosecution witness have stated this, so the Prosecution should
23 have known that this witness was talking nonsense.

24 I mean, where do they pass with these diamonds to come to
16:26:32 25 give it to me to keep and then do what? And then go back? I
26 mean, I don't know how to put it except to just - I mean, if you
27 look at it logically and look at the facts before this Court this
28 is just total nonsense that the road is closed, the whole place
29 is blocked, there's no connection, but they come through in late

1 1992 and say, "Oh, here are some diamonds. Please keep it for
2 us." What is that? What is that?

3 Q. Now dealing with some more testimony, Mr Taylor, did you
4 have a radio operator assigned to you?

16:27:20 5 A. Yes, I did.

6 Q. What was the call sign of your radio operator?

7 A. The call sign of my radio operator was Butterfly.

8 Q. And what's the name of the individual who had that call
9 sign?

16:27:36 10 A. One of the Gambian Special Forces had that call sign. His
11 name is Yanks Smythe.

12 Q. How do you spell the second name?

13 A. That is S-M-Y-T-H-E, Smythe.

14 Q. Now, on the --

16:28:08 15 JUDGE SEBUTINDE: How do you spell the first name?

16 THE WITNESS: Y-A-N-K-S, Yanks. Yanks Smythe.

17 MR GRIFFITHS:

18 Q. Now, on 2 July 2008 --

19 A. Excuse me here, counsel, because we're trying to help the
16:28:29 20 Court. He is one of the Gambian Special Forces. He does have -

21 this is the name after he becomes a Liberian. He was Yankuba

22 something but we changed the name, but I don't want in the future

23 you to say, "Well, Mr Taylor, why didn't you tell us he had

24 another name?" He does have another name. He is Mandingo from

16:29:02 25 the Gambia. He is Yankuba something. I don't remember the other

26 Mandingo name.

27 PRESIDING JUDGE: Is that Y-A-N-K-U-B-A?

28 THE WITNESS: That is correct, your Honour.

29 MR GRIFFITHS:

1 Q. Now, on 2 July 2008 at page 12879 of the transcript it is
2 suggested that there was radio communication between your radio
3 operator Butterfly and Foday Sankoh's operators where
4 Foday Sankoh is complaining about a lack of arms and ammunition
16:29:54 5 and that your response was quote, "That's guerrilla warfare", and
6 this was supposed to be in 1993. Was there that kind of contact
7 in 1993?

8 A. There could have never been such a contact.

9 Q. Why not?

16:30:13 10 A. Because we had already cut off relationship in 1992 and
11 that Special Force that I'm talking about, Yankuba, would have
12 not indulged in any such thing. One thing I found out they are
13 very, very disciplined and strict individuals. He would have
14 never done that, ever.

16:30:36 15 PRESIDING JUDGE: We're just about out of tape,
16 Mr Griffiths, so perhaps we'll leave it at that.

17 MR GRIFFITHS: Very well.

18 PRESIDING JUDGE: Mr Taylor, just before we adjourn I'll
19 give you the usual caution. You are ordered not to discuss your
16:30:53 20 evidence with any other person. We'll adjourn now until 9.30
21 tomorrow morning.

22 [Whereupon the hearing adjourned at 4.30 p.m.
23 to be reconvened on Thursday, 23 July 2009 at
24 9.30 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

DANKPANNAH DR CHARLES GHANKAY TAYLOR	24968
EXAMINATION-IN-CHIEF BY MR GRIFFITHS	24968

EXHIBITS:

Exhibit D-89 admitted	25045
Exhibit D-90 admitted	25046