



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 24 JUNE 2010
9.02 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Ms Sidney Thompson

For the Registry:

Ms Advera Nsiima Kamuzora
Ms Zainab Fofanah

For the Prosecution:

Ms Brenda J Hollis
Mr Mohamed A Bangura
Ms Kathryn Howarth
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Terry Munyard
Mr Morris Anyah
Ms Logan Hambrick
Ms Kathryn Hovington

1 Thursday, 24 June 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.02 a.m.]

09:02:22 5 PRESIDING JUDGE: Good morning. We'll take appearances
6 first, please.

7 MS HOLLIS: Good morning, Madam President, your Honours,
8 opposing counsel. This morning for the Prosecution, Mohamed A
9 Bangura, Maja Dimitrova and Brenda J Hollis.

09:02:44 10 MR ANYAH: Good morning, Madam President. Good morning,
11 your Honours. Good morning, counsel opposite. Appearing for the
12 Defence this morning are myself Morris Anyah and Ms Kathryn
13 Hovington. Thank you.

14 PRESIDING JUDGE: Good morning, Madam Witness. This
09:03:00 15 morning we continue with your testimony with some questions from
16 the Prosecution and I just remind you that you are bound by the
17 oath you initially took to tell the truth. Ms Hollis, please
18 continue.

19 WITNESS: DCT-299 [On former oath]

09:03:19 20 CROSS-EXAMINATION BY MS HOLLIS: [Continued]

21 Q. Good morning, Madam Kallon.

22 A. Yes, good morning.

23 Q. Madam Kallon, you were aware that Liberians were being used
24 as instructors at the RUF training area in Camp Naama, weren't
09:03:44 25 you?

26 A. Repeat the question.

27 Q. You were aware that Liberians were being used as
28 instructors at the RUF training area in Camp Naama, weren't you?

29 A. I did not know.

1 Q. You knew that there were Liberians at the RUF training base
2 at Camp Naama, didn't you?

3 A. I did not go in there to find out. I don't know.

09:04:32

4 Q. You have talked about Isaac Mingo. In fact, you saw him at
5 Camp Naama, didn't you?

6 A. No, I did not see him there. Except that if he was there
7 and I did not see him, but at the time that I went there, I did
8 not see him.

09:04:55

9 Q. And you knew that he was a physical training instructor
10 there, didn't you?

11 A. I heard it during the dispute between himself and Kargbo.

12 Q. You also knew a person by the name of Gonkanu who was an
13 instructor at Camp Naama, yes?

14 A. Repeat the question.

09:05:23

15 Q. You also knew a person by the name of Gonkanu who was an
16 instructor at Camp Naama, yes?

17 A. I do not know him.

18 Q. And you knew that he was a Liberian instructor at the
19 Foday Sankoh training area in Camp Naama, didn't you?

09:05:52

20 A. I do not know that person.

21 Q. You also knew a Sylvester who was a Liberian instructor at
22 Camp Naama. Isn't that right?

23 A. I don't know him.

09:06:12

24 Q. So is it correct, Madam Kallon, that you really didn't know
25 most of the people who were training at the Foday Sankoh training
26 area at Camp Naama?

27 A. Yes, I did not know them.

28 Q. So when you told Defence counsel that only Sierra Leoneans
29 were at the Foday Sankoh training area, you simply do not know if

1 there were Liberians there. Is that right?

2 A. Repeat the question.

3 Q. Yes. You told Defence counsel in response to his question
4 that only Sierra Leoneans were at the Foday Sankoh training area
09:06:56 5 at Camp Naama. The truth is you simply do not know that there
6 were Liberians there. Is that right?

7 A. The Sierra Leoneans were the ones I saw and those whom I
8 saw are the ones I know about.

9 Q. You in fact saw others who were Liberians, but you didn't
09:07:22 10 know they were Liberians. Is that right?

11 A. The people whom they told me about are the ones I knew. I
12 did not know any other person.

13 Q. And you didn't know most of the people at the camp. Is
14 that right?

09:07:43 15 A. No, I did not know all the people. I was not going into
16 the place.

17 Q. You knew that small children were trained at the
18 Foday Sankoh training area at Camp Naama, didn't you?

19 A. I knew about one lady who came to me. I saw her child.

09:08:18 20 Q. In fact, there were several small children being trained at
21 Camp Naama, weren't there?

22 A. I did not see many children there. It is that woman's
23 child.

24 Q. In fact, Madam Kallon, you saw more than one small child
09:08:40 25 being trained there. You are simply not being truthful about
26 that; isn't that correct?

27 A. I saw one child.

28 Q. And in fact there were at least four very small children
29 being trained at Camp Naama in the RUF area. Isn't that correct?

1 A. I did not see them. I saw one.

2 Q. Madam Kallon, who is Martin George?

3 A. I do not know him.

09:09:28

4 Q. So you did not know that he trained at Camp Naama at the
5 Foday Sankoh area?

6 A. Like I have told you, I did not know all the people.

7 Q. So this is another Liberian that you didn't know anything
8 about. Is that right?

9 A. I don't know him.

09:09:46

10 Q. And Martin George told these judges about four small small
11 boys who trained at the Foday Sankoh area, and he mentioned two
12 of these boys by name and said one of these boys was named Base
13 Marine and that Base Marine was between nine and ten years old
14 while he was being trained. Madam Kallon, you knew Base Marine
15 at the Foday Sankoh training area, didn't you?

09:10:16

16 A. No.

17 Q. And, Madam Witness, you knew a young boy of about eight
18 years old, Michael Stewart, who was also being trained there.
19 Isn't that right?

09:10:35

20 A. That's the boy that I said came to me.

21 Q. In addition to training these small small boys at Camp
22 Naama, the RUF used small children to fight in Sierra Leone.
23 Isn't that correct?

09:11:04

24 A. I was not present when they were planning their fighting,
25 so I don't know that.

26 Q. You were present in Sierra Leone and you saw these small
27 boys fighting for the RUF, didn't you, Madam Witness?

28 A. I did not see that.

29 Q. Is that what you want the Court to believe, Madam Witness?

1 A. Yes, what I don't know, I don't know.

2 Q. You know or knew SYB Rogers, correct?

3 A. Yes.

4 Q. He was an elderly statesman and spokesman for the RUF,
09:11:49 5 correct?

6 A. Yes.

7 Q. And if Mr Rogers admitted that the RUF used boys as young
8 as ten or eleven as fighters, he would be correct, yes?

9 A. I didn't go in there because I was not living there with
09:12:24 10 them. Maybe the things he knew, I don't know.

11 Q. Joseph Brown: Did you know Joseph Brown?

12 A. Joseph Brown? I know him - I knew him in Kono in Sierra
13 Leone.

14 Q. And you knew that he was a Liberian, correct?

09:12:57 15 A. Yes, he was Liberian but I knew him in Kono during the
16 latter stages.

17 Q. You actually knew that he trained at the Foday Sankoh
18 training area in Camp Naama, didn't you?

19 A. I don't know that. It was not - I didn't know him for
09:13:18 20 long.

21 Q. So this was another Liberian trainee that you didn't know
22 about. Is that correct?

23 A. No.

24 Q. That's not correct? Or it was another Liberian trainee you
09:13:33 25 didn't know about?

26 A. I did not know him. I knew - I only knew him in Kono.

27 Q. When were you in Kono that you knew Joseph Brown?

28 A. At the time that vehicles started plying the route when so
29 many people had returned there, that was the time that I knew

1 Joseph Brown.

2 Q. You are going to have to help us a little bit more with
3 that, Madam Witness. Was this during your first trip into Sierra
4 Leone after the invasion that you were in Kono?

09:14:24 5 A. No.

6 Q. Was this during the junta period that you were in Kono?

7 A. No, it was not during the junta period. When everything
8 was returning to normalcy, that's when I returned to Kono and met
9 Joseph Brown.

09:14:49 10 Q. Well, when was that? Was that before Lome? Was that after
11 Lome? When was it?

12 A. I think - I think it was after Lome. I didn't know him for
13 long.

14 Q. And why were you in Kono?

09:15:19 15 A. I went in search of money.

16 Q. What were you doing to get money in Kono?

17 A. I was selling in the market. At that time mining
18 activities were going on, so civilians were being allotted plots.
19 I had three boys. Some other civilians also had boys who were
09:15:51 20 mining for them.

21 Q. So you were actually in Kono and you had three boys who
22 were mining for you. Is that correct?

23 A. Yes.

24 Q. And these boys were mining diamonds for you. Is that
09:16:06 25 correct?

26 A. Yes.

27 Q. And you were turning over at least a share of these
28 diamonds to the RUF leadership. Isn't that correct?

29 A. No, it was for myself.

1 Q. It was for yourself. So were you sharing these diamonds
2 with all of the civilians in Kono?

3 A. No. It was not many diamonds. When I got diamonds, it was
4 for myself. When the boys got it, I'll buy the diamond from them
09:16:45 5 and I'll sell it to the jewellers.

6 Q. You didn't buy from these boys because you were forcing
7 them to work for you. Isn't that correct?

8 A. No, at that time people were taking boys there to work for
9 them.

09:17:01 10 Q. And they were forcing these boys to work for them, weren't
11 they?

12 A. My own boys were working for me. I fed them. When they
13 got diamonds I'll buy those diamonds and I'll sell them in turn.

14 Q. Let's go back to the Liberians who were training at Camp
09:17:23 15 Naama in the Foday Sankoh area. Did you know Alfred Brown?

16 A. No.

17 Q. You knew him, didn't you? You knew him in the RUF, didn't
18 you, Madam Witness?

19 A. I didn't know him.

09:17:59 20 Q. And you knew that he was another Liberian who trained at
21 Camp Naama. Isn't that right?

22 A. I don't know.

23 Q. And you knew Monica at Camp Naama, didn't you?

24 A. I did not know Monica at Camp Naama. I knew her in Kono.

09:18:29 25 Q. And you knew that Monica was a Liberian who had trained at
26 Camp Naama, didn't you?

27 A. I don't know whether he trained in Camp Naama. I trained -
28 I knew her in Kono.

29 Q. I'm sorry, did you say you trained or you knew her in Kono,

1 or was that an interpretation error? Did you say, Madam Witness,
2 "I trained - I knew her in Kono"?

3 A. I said I knew her in Kono, but I did not know whether she
4 was trained in Camp Naama.

09:19:13 5 Q. Theophilus Pearson. Did you know Theophilus Pearson?

6 A. Repeat that.

7 Q. Theophilus Pearson. Did you know Theophilus Pearson?

8 A. No.

9 MS HOLLIS: Theophilus, my spelling would be

09:19:44 10 T-H-E-O-P-H-I-L-U-S:

11 Q. Madam Witness, you knew that Theophilus Pearson was another
12 Liberian who was training at the Foday Sankoh training area,
13 didn't you?

14 A. I don't know that person.

09:19:59 15 Q. What about Rambo? Boston Flomo who was also known as
16 Rambo. You knew him at Camp Naama at the Foday Sankoh training
17 area, didn't you?

18 A. The Rambo whom I knew, the boy whom I knew, the Rambo who
19 was killed in Makeni was the one I knew but I did not know his
09:20:34 20 real name.

21 Q. But you knew that he trained at the Foday Sankoh training
22 area in Camp Naama, didn't you?

23 A. I don't know that.

24 Q. So, Madam Witness, is it correct that there were many
09:20:52 25 people at the RUF training area at Camp Naama that you simply did
26 not know their names and you did not know their nationality? Is
27 that correct?

28 A. I did not know - I said I did not go in. I stopped
29 outside. To say that I knew all the people who were inside, no.

1 Just a few. I did not know many of them.

2 Q. Now, you have told the Court about Isaac Mingo and that he
3 disappeared and was gone for a month or so from Harbel. Do you
4 remember telling the Court that?

09:21:36 5 A. Yes.

6 Q. And that when he came back to Harbel, he said that he had
7 been at Naama training the boys there. Do you remember telling
8 the judges that?

9 A. I said - I said Isaac told Kargbo that he was at Naama
09:22:02 10 helping the people. That was what he said.

11 Q. And you said that he was helping them training the boys,
12 correct?

13 A. That was what he said.

14 Q. Were you there when Isaac Mingo left to go to Naama? Were
09:22:22 15 you present when he left?

16 A. He just disappeared. We did not see him.

17 Q. And you didn't go with him when he left, did you?

18 A. No.

19 Q. So you do not know who he may have met with after he left
09:22:44 20 Harbel, do you?

21 A. I don't know.

22 Q. And you don't know if he stopped in Gbarnga on his way to
23 Camp Naama, do you?

24 A. I don't know that.

09:23:03 25 Q. And you don't know what orders he may have received from
26 anyone before he went to Naama, do you?

27 A. I don't know anything.

28 Q. Now, you told the judges at one point about the RUF
29 training area that the NPFL were close to the RUF area. Do you

1 remember telling them that?

2 A. Yes, but the place was divided.

3 Q. And you said that the NPFL were right up. Do you remember
4 telling them that?

09:23:51 5 A. Yes.

6 Q. By "right up" you meant that they were very close to the
7 RUF area, correct?

8 A. They were not close. The place was a big place. It was
9 divided with a fence and where the RUF was, they were down a
09:24:19 10 slope. It was deep.

11 Q. Well then, what did you mean when you told these judges
12 that the NPFL were right up from the RUF area? What did you
13 mean?

14 A. What I meant was that there was a hill. The NPFL were up
09:24:37 15 that hill and the RUF were down and that place was deep.

16 Q. So the NPFL were at the top of the hill and the RUF
17 training area was at the bottom of the hill?

18 A. Repeat the question.

19 Q. The NPFL were at the top of the hill and the RUF training
09:25:01 20 area was at the bottom of the hill?

21 A. Yes.

22 Q. And from the top of the hill you could look down into the
23 RUF training area, correct?

24 A. Well, you would look but you can't recognise people except
09:25:26 25 for those whom you had known before.

26 Q. So you could see people down there, you could see what they
27 were doing, but unless you knew them you couldn't recognise them.
28 Is that what you're saying?

29 A. What I mean is that even if someone was passing by you

1 wouldn't recognise that person except if you knew that person.

2 If they wanted to do something, they had someplace to do it, you
3 wouldn't be outside and see them.

09:26:03 4 Q. Now, you talked about Foday Sankoh giving President Momoh a
5 90-day ultimatum over the radio. Do you remember talking about
6 that?

7 A. Yes.

8 Q. You said that Philip Palmer was with Foday Sankoh when
9 Foday Sankoh went to give this ultimatum, correct?

09:26:18 10 A. Repeat that question.

11 Q. Certainly. You said that Philip Palmer was with
12 Foday Sankoh when Foday Sankoh went to give this ultimatum,
13 correct?

14 A. I'm confused about that area.

09:26:53 15 Q. What do you mean you're confused about that area?

16 A. Because Palmer and others were not with us.

17 Q. What do you mean you're confused "because Palmer and others
18 were not with us"? What do you mean by that?

19 A. I was not present when the Pa went to speak over the radio.

09:27:30 20 Q. So you weren't with him when he gave that ultimatum,
21 correct?

22 THE INTERPRETER: Your Honour, this "ah" is ambiguous. Can
23 she answer yes or no.

24 PRESIDING JUDGE: Madam Witness, can you not say "ah" or
09:27:50 25 "mmm" but say yes or no, please. So what was your answer?

26 THE WITNESS: I was not present.

27 MS HOLLIS:

28 Q. You told the judges about getting fuel for Pa Morlai. You
29 said you got drums of fuel for Pa Morlai and you said you got

1 that fuel from ECOMOG. Do you remember telling the judges about
2 that?

3 A. Yes.

4 Q. What kind of fuel was it that you got for Pa Morlai?

09:28:30 5 A. It was diesel.

6 Q. And you said that this fuel that you got from ECOMOG, you
7 talked about the river filling to the brim and allowing boats to
8 come from Monrovia. Was it from these boats that you got this
9 fuel?

09:28:49 10 A. Yes, when the river overflows boats used to come from
11 Monrovia all the way to that village.

12 Q. And when you say all the way to that village, what village
13 are you talking about?

14 A. The village called Kai fa Town.

09:29:20 15 Q. Now, you said that you did not pay ECOMOG, but you sent
16 them palm oil. Now, did you yourself go deal with ECOMOG to get
17 this fuel or did you send someone else to do it?

18 A. I myself boarded the boats. Before you board the boat, you
19 would have to take a white piece of cloth and wave it, and when
09:29:47 20 ECOMOG sees you they will be ready to receive you. That was how
21 we were doing the business there.

22 Q. In addition to obtaining this diesel for Foday Sankoh, you
23 also obtained diesel for Charles Taylor and his force. Isn't
24 that correct?

09:30:08 25 A. No.

26 Q. In addition to diesel, did you get anything else from
27 ECOMOG?

28 A. On that particular day, it was only the diesel that I went
29 to take and that was what I got.

1 Q. On any other occasion did you get anything else from
2 ECOMOG?

3 A. Yes.

4 Q. What did you get from ECOMOG?

09:30:41 5 A. I was not the only person who went to that place. All the
6 business people used to go there, but we didn't allow the
7 soldiers to know about it. We - it was only us the business
8 people that used there for our businesses.

9 Q. What did you get from ECOMOG in addition to the fuel? What
09:31:05 10 did you get from ECOMOG?

11 A. Whatever we wanted to buy we will just put that on the
12 list. What they too wanted, that was what we used to do, be it
13 food or whatever wanted to get from Monrovia, we passed through
14 that place. I was not the only person.

09:31:32 15 Q. And what place is it you are talking about that you went to
16 get these other items?

17 A. That same place, Kai fa Town, that was where we boarded the
18 boats.

19 Q. And when you went back to Harbel with these items, you
09:31:50 20 provided some of these items to the NPFL there, correct?

21 A. No.

22 Q. You used your contacts with ECOMOG to gather intelligence
23 for Charles Taylor, didn't you?

24 A. No. We were focused on business.

09:32:12 25 Q. And you reported back to Charles Taylor what you learned
26 from ECOMOG that you were dealing with, correct?

27 A. No.

28 Q. Madam Witness, who was Raka?

29 A. Raka was a boy who was staying with me.

1 Q. And he lived with you how long?

2 A. He was with me for a long time.

3 Q. Was he with you from the time he was a small boy until he
4 grew up?

09:33:17 5 A. Yes.

6 Q. Was he your husband's son?

7 A. No.

8 Q. This boy Raka became an RUF fighter, correct?

9 A. He too escaped and went.

09:33:39 10 Q. And Raka was killed in 1995 as the RUF were advancing
11 toward Freetown, correct?

12 A. Up till now nobody has told me whether he has died or has
13 not died.

14 Q. You were aware that he had been killed as the RUF advanced
09:34:04 15 toward Freetown, weren't you?

16 A. No, I don't know.

17 Q. Madam Witness, I would like to ask you some questions about
18 your family. Would you prefer that we do that in private
19 session?

09:34:28 20 A. Yes.

21 Q. That is to say, where the members of the public could not
22 hear.

23 A. Yes.

24 MS HOLLIS: Madam President, I would request, to protect
09:34:40 25 the privacy of the witness's family, that I be allowed to ask
26 these questions in private session.

27 PRESIDING JUDGE: Very well. Madam Court Manager, please
28 arrange a private session for the protection of the witness's
29 privacy.

1 [At this point in the proceedings, a portion of
2 the transcript, pages 43318 to 43322, was
3 extracted and sealed under separate cover, as
4 the proceeding was heard in private session.]

09:46:28

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1 [Open session]

2 MS KAMUZORA: Your Honours, we're in open session.

3 JUDGE DOHERTY: Ms Hollis, before we move off the subject
4 of the witness's children, I note there was a question and an
09:46:54 5 answer at page 18 line 19 of my transcript in which the witness
6 referred to Raka and she said in answer to your question, "He too
7 escaped and went." What does the witness mean by that answer?

8 MS HOLLIS: Thank you, Madam Justice:

9 Q. Madam Witness, when you said that Raka escaped and went,
09:47:24 10 what did you mean?

11 A. He went to fight.

12 Q. What do you mean when you said he escaped?

13 A. I was not present when he went.

14 PRESIDING JUDGE: Furthermore in relation to Raka, when
09:47:50 15 Raka is described as a boy, could we have some indication of his
16 age at the time that he went to fight?

17 MS HOLLIS: Thank you, Madam President:

18 Q. Madam Witness, how old was Raka when he went to fight?

19 A. That boy when I was bringing him up, he was not growing.

09:48:18 20 Q. What was his age at the time he went to fight?

21 A. He could have been around - around 14.

22 Q. And did he go to fight first with the NPFL?

23 A. No.

24 Q. He went to fight with the RUF when he was 14 years old. Is
09:48:52 25 that correct?

26 A. Yes.

27 Q. Thank you, Madam Witness. Madam Witness, you have talked
28 about going into Sierra Leone after the invasion of Sierra Leone,
29 and you told the judges that you took a vehicle halfway and then

1 you walked into Sierra Leone. Where was it that you began
2 walking? At what location did you begin to walk?

3 A. It was from Mendekoma. There was a Loumah there.

09:49:41

4 Q. You have said before that Loumah means market. Is that
5 correct?

6 A. Yes.

7 Q. So you were able to take a vehicle from Harbel all the way
8 to Mendekoma. Is that correct?

9 A. In bits.

09:49:58

10 Q. What do you mean "in bits"?

11 A. It's not possible for you to have a vehicle that goes
12 directly from Firestone to Mendekoma.

13 Q. So you were in more than one vehicle between Firestone and
14 Mendekoma. Is that correct?

09:50:17

15 A. Yes.

16 Q. You actually went into Sierra Leone at the same time that
17 the invasion occurred. Isn't that right?

18 A. Explain that word. I do not understand it.

09:50:51

19 Q. Certainly. In actuality, Madam Witness, you went into
20 Sierra Leone at the time that the invasion occurred. In other
21 words, right at the time that the fighters went into Sierra Leone
22 you also went into Sierra Leone. Isn't that correct?

23 A. No.

09:51:10

24 Q. And, Madam Witness, when you went to Koi lu, you actually
25 took part in looting in Koi lu, did you not?

26 A. I did not loot.

27 Q. And you took part in looting such things as bales of
28 cotton, shoes, dishes; yes?

29 A. Before I got to Koi lu there was nothing in the shops, so I

1 was not there when they were doing those things.

2 Q. And, Madam Witness, you looted these materials from
3 civilians in the Koi lu area, correct?

09:51:58

4 A. I have never harassed a civilian because we are all equal,
5 so I did not take part in those issues.

6 Q. And you actually used one of Foday Sankoh's vehicles to
7 take your looted goods from Sierra Leone to Harbel, didn't you?

8 A. No.

09:52:19

9 Q. And in fact when you went back to Harbel with these looted
10 goods, you were actually escorted by Raka, weren't you?

11 A. Since Raka ran away I have not seen him up until now, so
12 that's a no.

13 Q. And while you were in Koin du - Koi lu, excuse me, taking
14 part in this looting, you would harass civilians. Isn't that

09:52:43

15 right?

16 A. No.

17 Q. And you would use force to take these goods if the
18 civilians resisted. Isn't that true?

19 A. No.

09:52:59

20 Q. And while you were in Sierra Leone on this visit,
21 Foday Sankoh had assigned bodyguards to you. Isn't that right?

22 A. No.

23 Q. And you would use these bodyguards to beat up civilians who
24 resisted turning their property over to you. Isn't that correct?

09:53:18

25 A. No.

26 Q. Madam Witness, while you were in Sierra Leone on this trip
27 you learned that the rebels, when they entered Pendembu, had
28 stolen money from the bank in Pendembu, correct?

29 A. Yes, I saw that money. When you went to any of the

1 commanders, you would see the money parked there.

2 Q. Now, we have talked about the fact that Foday Sankoh told
3 you to open markets while you were in Sierra Leone on this trip,
4 and you told the judges the names of the towns in which you
09:54:03 5 opened markets and that included Koi lu, correct?

6 A. Repeat.

7 Q. Certainly. We have talked about the fact that Foday Sankoh
8 told you to open markets while were you in Sierra Leone on this
9 trip, correct?

09:54:23 10 A. Yes.

11 Q. You have told the judges the names of the towns in which
12 you opened markets, yes?

13 A. Yes.

14 Q. And those towns included Koi lu, correct?

09:54:37 15 A. Koi lu.

16 Q. Before the attack on Sierra Leone, Koi lu was a well-known
17 international trade centre, wasn't it?

18 A. Yes.

19 MR ANYAH: Madam President.

09:54:58 20 PRESIDING JUDGE: Yes, Mr Anyah.

21 MR ANYAH: To be more accurate, when you look at the
22 transcript from 17 June in some instances the witness does refer
23 to Koindu as a place where she established a market. One example
24 is at page 42762. This is 17 June, lines 20 through 25. In the
09:55:27 25 preceding page there were issues about whether it was - well, in
26 some of the preceding questions leading up to that there were
27 issues about Koi lu versus Koindu, but the witness there says, "I
28 went to Koindu and I established the Koindu markets there." I
29 just point that out so that the record is clear. The markets

1 were established in Koindu and there may very well be instances
2 in the transcript where it's referred to as Koilu but the witness
3 has said Koindu.

4 MS HOLLIS:

09:56:04 5 Q. Well, Madam Witness, let's be clear about this. Did you
6 open a market in Koilu or in Koindu?

7 A. I opened the market in Koilu. You know when you go - if
8 you are educated the way you pronounce is different from an
9 uneducated person.

09:56:30 10 PRESIDING JUDGE: Madam Witness, this is not a question of
11 education. There are two places, one is called Koindu and the
12 other is Koilu. Please do not confuse us. The two do not sound
13 the same and it's not a question of education. It's a question
14 of what you are telling the Court. What is your evidence? Is it
09:56:55 15 that you established markets or a market in Koilu or in Koindu?
16 Which of the two places?

17 THE WITNESS: Koilu.

18 PRESIDING JUDGE: Thank you.

19 MS HOLLIS:

09:57:19 20 Q. Now, Madam Witness, I had asked you previously if in fact
21 it was true that before the attack on Sierra Leone, Koilu was a
22 well-known international trade centre and you had said yes. And
23 in fact people would come from Guinea, Liberia as well as other
24 parts of Sierra Leone to come to that market and trade or buy,
09:57:43 25 correct?

26 A. Yes.

27 Q. In what other places did you tell the judges you
28 established markets?

29 A. I opened a market at Dia, Sandiaru, Dodo Kortuma and Buedu.

1 Q. And before you opened these markets these places already
2 had markets, isn't that right?

3 A. At the time that there was no fighting they had had those
4 Loumah areas.

09:58:28 5 Q. And then when the fighters came in from Liberia, then these
6 markets had to close, correct?

7 A. When they started the fighting they stopped selling.

8 Q. And in fact many of the civilians ran away from the rebels
9 when they came into Liberia, correct?

09:59:04 10 A. I know that when the war started - yes, some people ran
11 away, but later when we started the markets they came back.

12 Q. And these markets that you started, you only allowed them
13 to be open one day a week in each location. Isn't that correct?

14 A. Yes.

09:59:29 15 Q. And you determined what people would be in charge of those
16 markets, correct?

17 A. I do not understand.

18 Q. It was you who chose the people who would be in control of
19 those markets, correct?

09:59:52 20 A. I did not select them. The people brought their leaders
21 and I saw them.

22 Q. Madam Witness, do you recall on 17 June - and for your
23 Honours and opposing counsel, I'm referring to page 42762 - do
24 you recall on 17 June telling these judges that Foday Sankoh said
10:00:17 25 you were a businesswoman, so you should establish a trade fair
26 centre and you would put people there who would be in charge, and
27 you indicated that when he said that to you, you accepted. Do
28 you remember telling the judges that?

29 A. Yes. But when you talk at the meetings, you will tell the

1 people that they should select their people. So later I will sit
2 down and organise that.

3 Q. But, in fact, you had the final say as to who was in charge
4 of these markets, correct?

10:00:53 5 A. Repeat that.

6 Q. Certainly. In fact, you had the final say as to who was in
7 charge of these markets, correct?

8 A. No, I would not just decide. It was the people, those whom
9 those people were to work with. They brought them. Whoever they
10:01:30 10 brought forward, I'll accept. That's how we worked, the market
11 people.

12 Q. The people in charge of each of these markets were
13 responsible for collecting money from the sellers who used the
14 markets, correct?

10:01:44 15 A. Yes. Whenever they sold, they were to pay dues.

16 Q. And the people in charge of the markets also collected
17 money from the buyers. Isn't that right?

18 A. I do not understand that part.

19 Q. The people who came to buy, the individuals who were in
10:02:22 20 charge of the markets, also collected a certain amount from the
21 people who came to buy at those markets. Isn't that correct?

22 A. No. When you brought something for sale, they will ask you
23 in your presence. But when you didn't have anything, how could
24 they ask you?

10:02:48 25 Q. When you went to the market and you bought something, you
26 had to pay the equivalent of a tax on what you bought. Isn't
27 that correct?

28 A. No, I don't know that. I do not understand that part. I
29 did not hear, nor see it.

1 Q. I suggest to you, Madam Witness, that you both heard it and
2 saw it, and in fact helped to set that system up.

3 A. Yes.

4 Q. Because, in fact, once the rebels came into Sierra Leone,
10:03:43 5 the people no longer had power over their own gardens, did they?

6 A. Yes.

7 Q. What do you mean? Did the people have control or power
8 over their own gardens after the rebels came into Sierra Leone?

9 A. No.

10:04:18 10 Q. And the produce from those gardens became the property of
11 the RUF, correct?

12 A. Yes.

13 Q. A portion of the money that was collected from these
14 markets was handed over to the RUF. Isn't that right?

10:04:41 15 A. At that time I think, yes, it could be that. Because when
16 I used to give them, I told them that if a commander comes with a
17 problem, they could take some of it and use it. That could be
18 true. They used to do it.

19 Q. And while you were in Sierra Leone having established these
10:05:12 20 markets, you also took a share of the money that was collected
21 from these markets. Isn't that right?

22 A. No.

23 Q. If the rebels did not approve of the way the person in
24 charge was conducting business, the rebels would change the
10:05:40 25 person in charge. Isn't that right?

26 A. They didn't do that in my presence.

27 Q. In fact, you took part in changing the people in charge
28 when they didn't do what you wanted them to do. Isn't that
29 right?

1 A. No.

2 Q. And if the person in charge did not give the rebels the
3 money that the rebels wanted, then the rebels would change that
4 person in charge, correct? They would put someone else in
10:06:25 5 charge, yes?

6 A. That's what I said. That was in my absence, but in my
7 presence, they did not do it. But in my absence, they did some
8 changes.

9 Q. In fact, you were present when changes occurred because the
10:06:43 10 person in charge had not given enough money to the rebels. Isn't
11 that true?

12 A. I was not there when they changed someone.

13 Q. And you were making your profit from these market
14 transactions. Isn't that right?

10:07:15 15 A. I had nothing to do with the small ones. When I give them,
16 I did not check them.

17 Q. Madam Witness, what do you mean, "I had nothing to do with
18 the small ones"?

19 A. Because the person who was in charge had nothing. Those
10:07:45 20 little monies - I knew that rebels were to go there, so I never
21 went there to tell them to give me money, no.

22 Q. Madam Witness, you were a businesswoman who was out to make
23 a profit, and in fact you did make a profit from those markets,
24 didn't you?

10:08:01 25 A. I did not make my profit in that particular area.

26 Q. The way that you had set up these markets in Sierra Leone
27 in the RUF areas, this was the same system for markets in the
28 NPFL areas in Liberia, wasn't it?

29 A. There is a difference in relation to the NPFL.

1 Q. The NPFL took money from those in charge of the markets in
2 the NPFL area. Isn't that right?

3 A. No. They did not collect monies from us.

4 Q. And, in fact, you were the one who provided the money to
10:09:05 5 the NPFL as superintendent of the Marketing Association in
6 Harbel. Isn't that correct?

7 A. No. That money was from our own group in the markets.

8 Q. And the markets in the NPFL areas also provided goods to
9 the NPFL. Isn't that correct?

10:09:31 10 A. No.

11 Q. Indeed, Madam Witness, you talked about taking 20 or 30
12 bags of food items to Foday Sankoh at the training area on a
13 regular basis, and most of the material that you took to
14 Foday Sankoh you got from the Market Association. Isn't that
10:10:07 15 correct?

16 A. I had my own business that I was doing. The money that we
17 collected from the market, I did not use it alone. I had to
18 submit a report to the market president, that is Annie Yoney. So
19 you wouldn't just use that money when it is given to you. You
10:10:32 20 the market women sat down together and you used the money. I did
21 not - that money did not belong to me alone. I had my own
22 business that I was doing.

23 Q. And --

24 PRESIDING JUDGE: Ms Hollis, please pause. You asked the
10:10:45 25 witness a question and she gave an answer that is not clear. At
26 page 36, line 11, you said to her: "And, in fact, you were the
27 one who provided the money to the NPFL as superintendent of the
28 Marketing Association in Harbel. Isn't that correct?" And she
29 answered: "No, that money was from our own group in the

1 markets." Now, what does that mean in relation to your answer?

2 I don't understand.

3 MS HOLLIS: Thank you, Madam President:

4 Q. Madam Witness, I had asked you that, in fact, you were the
10:11:22 5 one who provided the money to the NPFL in your role as
6 superintendent of the Marketing Association in Harbel, and you
7 said, "No, that money was from our own group in the markets."
8 What did you mean when you said, "That money was from our own
9 group in the markets"?

10:11:51 10 A. Yes, because when you are a superintendent, you just did
11 not sit alone in the office. You were there with some other
12 people. So all of us would check - count the money. And after
13 that, we would take ours, then we'll submit a report to our boss,
14 that is Annie Yoney.

10:12:11 15 Q. And part of what you received from the markets went to the
16 NPFL, correct?

17 A. No.

18 Q. And that was the reason that you were allowed to continue
19 in business, because you were providing part of your profits to
10:12:25 20 the NPFL, correct?

21 A. No.

22 Q. And you were also providing market goods to the NPFL, yes?

23 A. No.

24 Q. Now, you told the judges about people you called town
10:12:56 25 commanders in areas of Sierra Leone that were controlled by the
26 RUF. These town commanders, what was their function?

27 A. They were heads. Whenever the fighters would want to do
28 something, if they go to that town, it is that town commander
29 that they would tell. So the town commander in turn would invite

1 the civilians and they will have a meeting and would explain to
2 them what he had said. Because most of their work was to carry
3 stuff. That is just the thing.

10:13:44 4 Q. Now, you also mentioned a chairman of committees, and you
5 said the chairman of these committees would be the head man of
6 the town. This chairman that you talked about, would that be the
7 same person that you referred to as a town commander?

8 A. What they did was in the chiefdom they would have town
9 commanders and above the town commanders they would have one
10:14:18 10 person they would refer to as chiefdom commander, so that
11 chiefdom commander would be in charge of the section. That is
12 how they worked.

13 Q. My question was in relation to this person you described as
14 a chairman of committees, would this chairman be the same as a
10:14:37 15 town commander?

16 A. Yes.

17 Q. When the rebels wanted something and the town commander
18 didn't deliver, the rebels would change the town commander,
19 correct?

10:15:00 20 A. Yes, that one, they did it.

21 Q. And if the rebels wanted to cultivate a farm, they would go
22 to the chairman or town commander and the chairman or town
23 commander would get the civilians to cultivate that farm for the
24 rebels, correct?

10:15:26 25 A. Yes.

26 Q. And then the rebels had the civilians harvest the produce
27 from these farms, correct?

28 A. Yes.

29 Q. And when the rebels wanted to take the produce to the

1 riverside with Guinea to trade, they would go to the chairman or
2 town commander and the chairman would get civilians to carry
3 those loads, correct?

4 A. Yes.

10:16:07 5 Q. And then it would be the rebels who would actually sell or
6 trade the produce, and they would keep the money or the goods
7 they received in exchange, correct?

8 A. Yes.

9 Q. And these civilians who had to cultivate the farms, they
10:16:33 10 had no choice but to do that. Isn't that right?

11 A. Yes.

12 Q. And the civilians who had to carry these loads, they had no
13 choice, did they?

14 A. Yes.

10:16:57 15 Q. You mean they did have a choice or they did not have a
16 choice?

17 A. They did it. It is not that they were pleased to do it.

18 Q. They did not have a choice. Is that what you're saying?

19 A. Yes.

10:17:20 20 Q. And you told the judges that the rebels got sufficient food
21 because civilians used to donate food to the rebels. In fact,
22 these civilians were forced to hand over their food to the
23 rebels, weren't they?

24 A. Yes, they would ask for contribution.

10:17:49 25 Q. Well, you say ask, but in fact it was a demand, wasn't it,
26 because the civilians had to contribute, didn't they?

27 A. Yes.

28 Q. In Sierra Leone while you were there, the NPFL used
29 civilians to carry loads of looted goods back into Liberia.

1 Isn't that correct?

2 A. I was in the interior there. I was not at the main road.
3 Some of the things, I did not know when they happened.

4 Q. You actually knew about the NPFL using Sierra Leoneans to
10:18:40 5 carry goods back into Liberia, didn't you?

6 A. I wasn't there.

7 Q. But you knew about it, didn't you?

8 A. I don't know about it.

9 Q. Now, you have mentioned some people you called RUF
10:19:10 10 contractors, Bangalie, Josie and Alpha. Did you ever see them
11 perform any duties except as contractors?

12 A. They didn't do anything else except the contractor job. I
13 don't know, maybe in my absence they did some other thing but I
14 did not see them do any other thing.

10:19:46 15 Q. When you left Sierra Leone after you had gone there and
16 established these markets, who was the President of Sierra Leone
17 at the time you left?

18 A. The time that I opened the markets?

19 Q. That trip to Sierra Leone when you went back to Harbel. At
10:20:15 20 the time you went back to Harbel, who was the President of Sierra
21 Leone?

22 A. It was Momoh.

23 Q. Madam Witness, you have talked about going to Gbarnga after
24 the NPFL were pushed out of Harbel, and you said that some of the
10:20:37 25 civilians who went from Harbel to Gbarnga then went on to Guinea.
26 Do you remember telling the judges that?

27 A. Yes.

28 Q. Do you know why they went on to Guinea instead of remaining
29 in Gbarnga?

1 A. Yes, because of the fighting. There was tension at the
2 place.

3 Q. Now, at the time you reached Gbarnga after you had been
4 pushed out of Harbel, there was no fighting in Gbarnga at that
10:21:21 5 time, was there?

6 A. No.

7 Q. So why didn't they stay in Gbarnga, if you know?

8 A. Repeat the question.

9 Q. Certainly. So why did they not stay in Gbarnga, if you
10:21:42 10 know?

11 A. Some people passed through and some people stayed.

12 Q. My question was why did these people who went to Guinea,
13 why did they not stay in Gbarnga, if you know?

14 A. When we were dislodged from Harbel they were afraid. Some
10:22:18 15 of them were afraid, so the moment they started the journey they
16 just passed through and they went.

17 Q. You mentioned a Dr Fabai who worked in Renne Hospital and
18 you said that he got medical supplies that he used at
19 Foday Sankoh's training area. Do you remember talking about this
10:22:43 20 doctor, Dr Fabai?

21 A. Yes.

22 Q. Renne Hospital was located where?

23 A. It was in Kakata.

24 Q. And Kakata was under the control of the NPFL, correct?

10:23:11 25 A. Yes.

26 Q. And Renne Hospital was in the area under the control of the
27 NPFL, correct?

28 A. Yes.

29 Q. You also mentioned a Dr Kamara who you said worked at Phebe

1 Hospital. Do you remember telling the judges about that?

2 A. Yes.

3 Q. And Phebe Hospital is located close to Gbarnga, correct?

4 A. Yes.

10:23:45 5 Q. It's on the main highway going to Gbarnga?

6 A. Yes.

7 Q. It's between Gbatala and Gbarnga, correct?

8 A. Yes.

9 Q. And that hospital as well was under NPFL control, yes?

10:24:05 10 A. Yes.

11 Q. So when the NPFL told these hospitals to provide medical
12 supplies, these hospitals had no choice but to do that, correct?

13 A. That one, I wasn't there.

14 Q. Well, Madam Witness, you knew that if the NPFL demanded
10:24:40 15 medical supplies from hospitals in areas under its control, those
16 hospitals had to comply with that demand. You knew that, didn't
17 you?

18 A. I don't know how he got his medicine and took it there, so
19 I can't answer the question.

10:25:08 20 Q. That's not my question, Madam Witness. You were a trader.
21 You moved throughout NPFL-controlled areas. You were a person in
22 a position of leadership. You provided assistance to NPFL. You
23 knew that if the NPFL demanded medical supplies from hospitals in
24 areas under its control, those hospitals had to comply with that
10:25:37 25 order. You knew that, didn't you?

26 A. I don't know about that.

27 Q. I suggest you do know; you simply do not want to admit it,
28 Madam Witness?

29 A. If I knew, I would have said yes. But that area, I don't

1 know about it.

2 Q. You said that when you fled from Gbarnga to Ganta you went
3 with the wife of a man you called Prince. Who was Prince?

4 A. Prince Taylor.

10:26:25 5 Q. And what nationality was Prince Taylor?

6 A. Sierra Leonean.

7 Q. And did he belong to any organised armed group at the time
8 his wife went with you to Ganta?

9 A. Yes.

10:26:49 10 Q. And what group was that?

11 A. The RUF group.

12 Q. And why did Prince's wife go with you to Ganta?

13 A. Because when we ran away to Gbarnga, where Prince's wife
14 was was the same place I stayed at one Mohamed Sesay's place. I
10:27:19 15 was there. So when the fighting erupted again, we all went. She
16 followed me.

17 Q. And were you a close friend of Prince or his wife?

18 A. I did not know them before that time, but when I went to
19 Mohamed Sesay his wife was there and I too stayed there when I
10:27:55 20 ran away from Harbel. So it was there that we got used to each
21 other, but at that time I did not know her husband.

22 Q. So it was just coincidence that she chose to go to Ganta
23 with you. Is that right?

24 A. Yes.

10:28:19 25 Q. Madam Witness, you told the judges that you relocated your
26 children to Danane because the schools in Gbarnga were not
27 running normally. Do you remember telling the judges that?

28 A. Yes.

29 Q. And then after Gbarnga was retaken, you yourself went to

1 Danane, correct?

2 A. Yes.

3 Q. When you were in Danane, Danane was a small city, wasn't
4 it?

10:28:58 5 A. It's big.

6 Q. There were not many more than some 30,000 people in Danane,
7 is that correct, when you were there?

8 A. There are many people there, refugees.

9 Q. And the Liberians who were there knew each other. Isn't
10:29:31 10 that correct?

11 A. No, we did not know each other.

12 Q. And the Liberians who were there associated with each
13 other. Isn't that correct?

14 A. I don't understand.

10:29:54 15 Q. The Liberians who were there associated with each other,
16 that is, they met, they interacted with each other. Isn't that
17 correct?

18 A. Yes. We used to sit together. They will talk to each
19 other because there wasn't work to do.

10:30:22 20 Q. You said there were many people there, refugees. There
21 were many Liberians in Danane. Isn't that right?

22 A. Yes.

23 Q. And there were many NPFL in Danane. Isn't that right?

24 A. No, because I don't know if there were soldiers there, but
10:30:52 25 we were many in the place.

26 Q. Madam Witness, you know very well that the NPFL was in
27 Danane. Isn't that correct? They would come there to rest.
28 They would come there on their way to other areas. You knew
29 that, didn't you?

1 A. I don't know. Where my house was was in the corner.

2 Q. And when you were about in Danane, you would meet and
3 interact with these NPFL people. Isn't that right?

4 A. I did not see them.

10:31:42 5 Q. In fact, Madam Witness, Danane was a major NPFL crossing
6 point from Liberia into Ivory Coast, correct?

7 A. I've told you people that my house was not situated in the
8 centre of town. I don't know about that.

9 Q. Madam Witness, it was actually Charles Taylor who sent you
10:32:11 10 to Danane, wasn't it?

11 A. No, Charles Taylor did not send me. If Charles Taylor had
12 sent me, I wouldn't have walked.

13 Q. And he sent you there to enable you to act on his behalf in
14 Ivory Coast, Guinea and Sierra Leone. Isn't that correct?

10:32:34 15 A. No, he was not the one who sent me there.

16 Q. Madam Witness, are you having trouble staying awake?

17 A. No, I don't have a problem.

18 PRESIDING JUDGE: But, Madam Witness, you keep yawning.
19 You are either very tired or hungry, which is it?

10:33:28 20 THE WITNESS: I'm very tired.

21 JUDGE LUSSICK: I might add today is no exception. I've
22 noticed that the witness every day she is giving evidence has
23 started yawning between 10 and 10.30 in the morning. So I don't
24 know what she does of a nighttime, but it's not getting much
10:33:45 25 sleep probably.

26 MS HOLLIS:

27 Q. Madam Witness, you are able to understand the questions
28 that are put to you, are you not?

29 A. Yes, I understand the questions.

1 Q. Charles Taylor had one of his senior men stationed in
2 Danane. Isn't that correct?

3 A. People used to say it, but I never went close to that
4 compound.

10:34:27 5 Q. And this senior man was there as Charles Taylor's
6 representative. Isn't that correct?

7 A. They only said a Mandingo man, but I've never seen him.

8 Q. And that man's name was Musa Cisse, correct?

9 A. That's what people used to say, but I don't know him.

10:34:58 10 Q. And when you say you don't know him, you are simply being
11 untruthful to this Court. Isn't that right?

12 A. I am saying the truth. What I know is what I am saying.

13 But if I don't know something, I will not say it. I used to hear
14 that man's name, but the two of us never met. We never met at a

10:35:31 15 place where I will say, "This is the man," no.

16 Q. In fact, Madam Witness, you had regular interactions with
17 Musa Cisse, didn't you?

18 A. No.

19 Q. And it was through Musa Cisse that you got your children
10:35:52 20 into school in Danane. Isn't that correct?

21 A. No.

22 Q. And, Madam Witness, Musa Cisse had a radio and a radio
23 operator at his compound in Danane. Isn't that correct?

24 A. I don't know, because I did not go inside.

10:36:24 25 Q. And, in fact, on occasion you used that radio to
26 communicate both with Gbarnga and with the RUF. Isn't that
27 correct?

28 A. No.

29 Q. And, indeed, Musa Cisse provided the RUF with access to

1 that radio in Danane. Isn't that right?

2 A. I did not see it, nor did I know about it.

3 Q. You were aware of it and, in fact, you used the radio from
4 time to time to communicate with the RUF, correct?

10:37:13 5 A. No.

6 Q. And there was radio contact between the external
7 delegation, these people you took to Ivory Coast, and Charles
8 Taylor in Gbarnga. Isn't that right?

9 A. I don't know, no.

10:37:36 10 Q. And, indeed, Charles Taylor sent a message through Musa
11 Cisse inviting some of the delegates to come from the Ivory Coast
12 to visit him in Gbarnga. Isn't that right?

13 A. I did not hear about that, nor did I know about it.

14 Q. You were well aware of that, weren't you, Madam Witness?

10:38:15 15 A. I don't know.

16 Q. Because when you were in Danane, you were actually working
17 with other members of the external delegation in their activities
18 in the Ivory Coast. Isn't that right?

19 A. That's not what happened.

10:38:36 20 Q. Madam Witness, throughout your testimony you have had a
21 problem with time periods, correct?

22 A. That's correct.

23 Q. And you have had a problem with dates, yes?

24 A. Yes, that's true.

10:39:08 25 Q. And your estimates of time periods have been simply guesses
26 on your part. Isn't that right?

27 A. Yes.

28 Q. So, for example, Madam Witness, on 17 June - for your
29 Honours and opposing counsel, I'm referring to page 42776 - the

1 Defence counsel asked you:

2 "At the time when you had come back from Sierra Leone back
3 to Harbel, you were still superintendent, John Mark was your
4 deputy. You made trips to Guinea and Abidjan to buy various
10:40:06 5 items. During the time when all of this was happening, who was
6 President of Liberia?"

7 And your answer was: "Well, I was doing my business up to
8 the time Amos Sawyer took over." Then the question was: "Were
9 you still based in Harbel when Amos Sawyer took over?" And your
10:40:31 10 answer was: "Yes, but we did not take long there when we left."
11 And you were asked, "Why did you leave Harbel?" "It was the
12 fighting."

13 Madam Witness, are you aware that Amos Sawyer became
14 President of the interim transitional government in Liberia in
10:40:57 15 late 1990?

16 A. I heard over the radio that it was the interim government.

17 Q. And are you aware that the rebels attacked Sierra Leone in
18 March 1991?

19 A. Yes.

10:41:26 20 Q. So you had gone to Sierra Leone, come back, gone to Guinea
21 and Ivory Coast many months after Amos Sawyer became the
22 President of interim government, correct?

23 A. Repeat the question.

24 Q. So you had gone to Sierra Leone, come back, gone to Guinea
10:41:53 25 and Ivory Coast many months after Amos Sawyer became the
26 President of the interim government, correct?

27 A. Repeat.

28 Q. So you had gone to Sierra Leone, come back, gone to Guinea
29 and Ivory Coast many months after Amos Sawyer became the

1 President of the interim government, correct?

2 A. Yes. I used to go back and forth before Amos Sawyer became
3 interim government.

10:42:58

4 Q. Actually, you did not, did you, Madam President, because -

5 Madam Witness, because Amos Sawyer became the President of the
6 interim government before the attack on Sierra Leone occurred?

7 So you simply do not know who was the President when you - or how
8 long Amos Sawyer had been President when you went to Sierra
9 Leone, correct?

10:43:31

10 A. Yes.

11 Q. And you also indicated - and for your Honours and opposing
12 counsel, this is from 17 June at pages 42749-42750 - you had also
13 indicated that on your first trip into Sierra Leone after the
14 invasion, that Doe was the President of Liberia. Again, Madam

10:44:19

15 Witness, the invasion of Sierra Leone occurred in March 1991.

16 You know that Master Sergeant Doe was killed in September 1990,
17 correct?

18 A. We just heard that he was killed but, you know, we don't
19 recall these dates.

10:44:48

20 Q. So you just have confusion with the sequence of events,
21 correct?

22 A. Yes.

23 Q. Madam Witness, you have talked about travelling from Danane
24 to Guinea, bribing officials there so you could set up business
10:45:27 25 by the riverbank, bribing officials so that you could trade
26 across the river into Sierra Leone, and you talked about giving a
27 2 million Guinean franc bribe to a Guinean captain. What was the
28 name of this captain that you bribed?

29 A. You know, these ones, they usually don't give you their

1 right names. They will just say Mon Ami.

2 Q. What did Mon Ami mean, or did you know?

3 A. No.

10:46:21

4 Q. And you talked about a couple, Alhaji and his wife called I
5 who were already trading at that area of the riverbank over which
6 you took control. Do you remember telling the judges about that?

7 A. Yes.

10:46:46

8 Q. So you took control of the riverbank where these two people
9 were already trading, and in fact you made Alhaji and his wife
10 pay money to you so they could continue to trade there. Isn't
11 that right?

12 A. Yes.

13 Q. And in fact you made them pay money so they could, in
14 effect, act as your agents at the riverside, yes?

10:47:12

15 A. Yes.

16 Q. So now you had access to the RUF in Sierra Leone; you had
17 access in Guinea; you had access back to Danane; and you had
18 access to Liberia. Correct?

10:47:41

19 A. No, from the time I left Liberia I did not return, so I did
20 not go to those areas.

21 Q. You were able to return to the Taylor-controlled areas of
22 Liberia any time you wished, correct?

23 A. No, after I had opened the riverside, I didn't go to
24 Liberia any more.

10:48:07

25 Q. I'm not asking about whether you went to Liberia, Madam
26 Witness. My question is that in fact if you had wanted to go
27 into Mr Taylor's controlled areas of Liberia, you would have been
28 able to do so, correct?

29 A. Well, at that time I did not have access there, so I did

1 not go there. So I wouldn't know if they would accept me to go
2 through or not. Because I did not go there, how would I have
3 told?

10:48:45 4 PRESIDING JUDGE: Ms Hollis, really I'm minded to announce
5 an early midmorning break to allow the witness to have a little
6 recess and to refresh herself and perhaps to request WVS to
7 ensure that the witness is not hungry. We will take a break now
8 and reconvene at the normal time at 11.30.

9 [Break taken at 10.50 a.m.]

11:27:45 10 [Upon resuming at 11.36 a.m.]

11 PRESIDING JUDGE: Madam Witness, I am sure you are feeling
12 better, yes?

13 THE WITNESS: Yes.

14 PRESIDING JUDGE: That's good. Ms Hollis, please continue.

11:35:57 15 MS HOLLIS: Thank you, Madam President:

16 Q. Madam Witness, you have told the judges that you could not
17 tell the difference between Guinean soldiers and police, yes?

18 A. Yes.

11:36:21 19 Q. So in reality you didn't know who it was you were bribing,
20 did you? It could have been soldiers, it could have been police,
21 it could have been customs, yes?

22 A. Yes, because the uniforms were mixed.

23 Q. What do you mean, "they were mixed"?

24 A. The colour of the uniforms was not one.

11:36:49 25 Q. This 2 million Guinean francs that you had to pay to this
26 captain to get control of the riverside, you told the judges that
27 the exchange rate at the time was US \$100 for 300,000 Guinean
28 francs, correct?

29 A. Yes.

1 Q. So for 2 million Guinean francs that would be almost US
2 \$700, correct?

3 A. Yes, because if you check it that way.

4 Q. You would be around US \$667, correct?

11:37:48 5 A. Yes.

6 Q. And where did you get almost US \$700 to bribe this captain?

7 A. I did not pay all that money at one go. When I first
8 started, I paid 1 million.

9 Q. And how long after did you pay the second million?

11:38:14 10 A. I wouldn't just remember the time, but I had to pay the
11 remaining to him.

12 Q. And did you pay this second million before you brought the
13 first group of delegates out from Sierra Leone?

14 A. No.

11:38:38 15 Q. It was after that?

16 A. Yes.

17 Q. So what you are telling the Court is that he basically gave
18 you credit in the form of 1 million Guinean francs; is that
19 right?

11:38:57 20 A. Yes. That was what they used to. When they asked you for
21 the money, you would first buy and start the business.

22 Q. Actually, Madam Witness, you had that money and you got it
23 from Charles Taylor. Isn't that correct?

24 A. My own business that I was doing.

11:39:24 25 Q. And your business that you were doing in Guinea enabled you
26 to provide assistance to Charles Taylor in Liberia as well as to
27 the RUF in Sierra Leone, correct?

28 A. I did not help Charles Taylor. I used to help the RUF.

29 Q. And you were giving assistance to Charles Taylor by helping

1 the RUF, correct?

2 A. Repeat the question.

3 Q. Certainly. You were giving assistance to Charles Taylor by
4 helping the RUF, correct?

11:40:05 5 A. No, I don't know that. I know that I was helping the RUF
6 fighters.

7 Q. And in fact?

8 PRESIDING JUDGE: Please pause. Please pause. Ms Hollis,
9 you asked the witness whether she - the money that she had,
11:40:27 10 whether she got it from Charles Taylor and her answer was, "My
11 own business that I was doing." How is that related to the
12 question you asked?

13 MS HOLLIS: Thank you, Madam President:

14 Q. Madam Witness, let me repeat my question to you. This
11:40:45 15 money that you used to bribe this captain, you got that money
16 from Charles Taylor; isn't this correct?

17 A. No.

18 Q. Now, while you were in Guinea, you were called to come to
19 Sierra Leone and bring out a group that was going to the Ivory
11:41:08 20 Coast, correct?

21 A. I first went in. After I was going in - after I had been
22 going in and out, that was when they told me.

23 Q. And they told you to come in and at that time you took out
24 this first group of delegates that were to go to the Ivory Coast,
11:41:31 25 correct?

26 A. I do not understand that.

27 Q. You were called in to take out a group of delegates that
28 were going to the Ivory Coast, correct?

29 A. No. At that time I did not take anybody along at first.

1 It was Dr Sebo that enabled me to cross.

2 Q. Madam Witness, please listen to my question. During the
3 time that you were in Guinea, you had established your business
4 there, you had this control over the riverbank, Foday Sankoh
11:42:16 5 called you in to Sierra Leone for you to take a group of
6 delegates to the Ivory Coast, correct?

7 A. Yes.

8 Q. Did Dr Sebo go with you into Sierra Leone when you went to
9 take this first group of delegates to the Ivory Coast?

11:42:46 10 A. It was Dr Sebo that I first took in.

11 Q. Madam Witness, let me ask my question and please listen to
12 my question and answer my question. Did Dr Sebo go with you into
13 Sierra Leone when you went to take this first group of delegates
14 to the Ivory Coast?

11:43:17 15 A. No. It was not at the same time.

16 Q. Are you sure that he did not accompany you when you went
17 into Sierra Leone to get this first group of delegates?

18 A. No, I said I first went with Doctor. It was during the
19 second time that I went for the people.

11:43:40 20 Q. And are you sure that Dr Sebo did not go into Sierra Leone
21 with you when you went in to get this first group of delegates?

22 THE INTERPRETER: Your Honour, this "ah" is ambiguous
23 again.

24 PRESIDING JUDGE: Madam, what is your answer?

11:44:05 25 THE WITNESS: I said no.

26 MS HOLLIS:

27 Q. The question was: Are you sure? Are you saying that to
28 your recollection Dr Sebo did not go into Sierra Leone with you
29 when you went to get this first group of delegates? Is that what

1 you are saying?

2 A. No. I did not go with him to take the first delegates.

3 Q. When this first group of delegates were going to the
4 riverside to cross into Guinea, you were also accompanied by some
11:44:50 5 RUF who were going to trade at the riverside, correct?

6 A. Repeat. I do not understand.

7 Q. When this first group of delegates were going to the
8 riverside to cross into Guinea, you were also accompanied by some
9 RUF who were going to trade at the riverside, correct?

11:45:25 10 A. I have still not understood your question.

11 Q. Well, you talked about taking this first group of delegates
12 to the riverside so you could cross into Guinea, yes?

13 A. The area that is confusing me is between the first
14 delegates and Dr Sebo. That's the cause of my confusion.

11:45:53 15 Q. And I think you said Dr Simbo. Did you say Dr Simbo?

16 PRESIDING JUDGE: Mr Interpreter, are you the one saying
17 Dr Simbo?

18 THE INTERPRETER: No, it's Dr Sebo, your Honour.

19 PRESIDING JUDGE: Did the witness say Dr Simbo?

11:46:11 20 THE INTERPRETER: I heard Dr Sebo.

21 PRESIDING JUDGE: Then please don't distort what the
22 witness is saying. Be accurate in your interpretation.

23 MS HOLLIS: And perhaps it was just me mishearing. If it
24 was, I apologise:

11:46:26 25 Q. Madam Witness, I want you to focus on my question and my
26 question is this: You have told the Court about taking this
27 first group of delegates to the riverside so you could cross into
28 Guinea, yes?

29 A. Yes. But we were not together with Dr Sebo.

- 1 Q. I did not ask you about Dr Sebo. Listen to my questions,
2 please, and answer what I am asking you, please. Now, when you
3 took this first group of delegates to the riverside, it's
4 correct, is it not, that there were also RUF going with you who
11:47:15 5 were going to the riverside to trade there? Is that correct?
6 A. Yes.
7 Q. And these RUF who were going to the riverside to trade had
8 produce that they were taking to the riverside, correct?
9 A. Yes.
11:47:35 10 Q. And in addition to that, these delegates had bags and other
11 things that they were taking with them to the Ivory Coast,
12 correct?
13 A. Yes, they had little bags.
14 Q. And civilians, Sierra Leone civilians, were forced to carry
11:47:58 15 all of this material to the riverside, correct?
16 A. Yes.
17 Q. Now, you told the judges that it would cost 350,000 Guinean
18 francs for you to be able to bribe the Guineans so that they
19 would allow the seven delegates to cross over. Do you remember
11:48:28 20 telling the judges that?
21 A. Yes.
22 Q. But you told these delegates that it would cost 700,000
23 Guinean francs, correct?
24 A. Yes.
11:48:42 25 Q. And you doubled the price because you are a businesswoman,
26 you were taking risks, so whatever you did you had to realise
27 some profit, correct?
28 A. Yes.
29 Q. You said that these RUF members of this delegation did not

1 have documentation to cross into Guinea. Did you have
2 documentation that allowed you to cross into Guinea?

3 A. I did not have documents.

11:49:25

4 Q. Well, why did you not have to pay another 50,000 to bribe
5 them so that you could cross into Guinea?

6 A. Because it was a smuggling business. So the person who was
7 at the riverside, when you give that person money, you will pass
8 through.

11:49:48

9 Q. So you did not have to pay an additional 50,000 Guinean
10 francs because you were already bribing those people to allow you
11 to travel back and forth. Is that correct?

12 A. Yes. They had known me.

13 Q. And you are telling the judges that you had no
14 documentation at all. Is that correct?

11:50:10

15 A. Yes, I hadn't any document.

16 Q. So you were passing to different areas of Guinea with no
17 documentation at all. Is that right?

18 A. I did not have a document, no.

11:50:28

19 Q. Well, if you could travel about in Guinea without
20 documents, why did you have to get false documents for the
21 members of the delegation who were going to Ivory Coast?

22 A. The documents that I had were refugee documents. Those
23 were the ones I took.

11:50:56

24 Q. So you did have documents and it was the document showing
25 you to be a refugee. Is that correct?

26 A. Yes.

27 Q. And they showed you to be a refugee from what country?

28 A. I said Sierra Leone.

29 Q. But now didn't you tell us yesterday that when you went to

1 the refugee camp in Danane, you told them that you had come from
2 Gbarnga? Didn't you tell us that yesterday?

3 A. Yes, that was what I said.

11:51:40

4 Q. And didn't you tell us yesterday that you did not tell them
5 you were from Sierra Leone?

6 A. That was what I told the people in Danane, but in Guinea I
7 said Sierra Leone.

8 Q. So in Guinea you got a separate set of refugee documents.
9 Is that correct?

11:51:59

10 A. Yes.

11 Q. In Guinea why did you not tell them that you were a refugee
12 from Gbarnga?

11:52:23

13 A. I did not just want to say it that way. I did not tell
14 them that because the Guinean refugee paper that they gave to me,
15 I was not entitled to supplies. They just gave me an ID, an
16 identity.

17 Q. And why did you not want to say that you were a refugee
18 from Gbarnga?

19 A. Because I just wanted a document from them.

11:52:42

20 Q. Well, could you not have gotten a document from them if you
21 had told them you were a refugee from Gbarnga?

22 A. I was not too sure. That was why I said I had come from
23 Sierra Leone.

11:53:06

24 Q. So you just fashion your story to suit whatever purpose you
25 have. Is that correct, Madam Witness?

26 A. Yes.

27 Q. Now, you told the judges that you bribed officials of the
28 Sierra Leone refugee committee to get false documents for these
29 delegates. What kind of documents did you get for these

1 delegates?

2 A. They prepared the refugee ID cards there.

3 Q. Now, since you bribed these people to get these documents,
4 did you have to tell them anything about the seven delegates, or
11:53:48 5 did you simply hand them the money and they gave you the
6 documents?

7 A. I first looked for a photographer to take their photographs
8 and then they wrote their names at the back of the photograph.
9 Then I took them along.

11:54:09 10 Q. Did you have to give any explanation to these members of
11 the refugee committee whom you had bribed? Did you have to give
12 them any information about these seven people?

13 A. They did not even see them. I said they just wrote on
14 their papers at the back of their pictures. I just sent the
11:54:36 15 pictures. Those writings that were on those cards, those are the
16 ones they put down, their names and where they had come from.

17 Q. And how much did you have to pay these members of the
18 refugee committee whom you bribed? How much did you have to
19 bribe them with?

11:54:55 20 A. All together it's 150,000 Guinean francs.

21 Q. So that was to get seven sets of false documents, correct?

22 A. Yes, to get the documents.

23 Q. You mentioned a lady that you said was named Diane Kono
24 Manie and you said she was the daughter of Mr Kono Manie and you
11:55:30 25 said she had pleaded with the soldiers about her father. With
26 what soldiers had she pleaded about her father?

27 A. The NPRC.

28 Q. And what was she pleading with these soldiers to do?

29 A. Because they had arrested her father. Her father was with

1 the rebels.

2 Q. When you say they had arrested her father, do you mean the
3 rebels had arrested her father?

4 A. Yes. The rebels had captured his father.

11:56:17 5 Q. And she was trying to get him released, correct?

6 A. Yes, he was trying to do that. He was pleading around. He
7 was saying that - she was saying that whoever saw her father, let
8 them send the father to Sierra Leone.

9 PRESIDING JUDGE: Mr Interpreter who is the "he" you keep
11:56:45 10 referring to?

11 THE INTERPRETER: Honestly, the witness - I am having
12 trouble understanding who the witness is exactly referring to,
13 whether it is the father or Diane herself.

14 THE WITNESS: The person's name?

11:56:57 15 MS HOLLIS:

16 Q. Madam Witness, when you said that this person was trying to
17 do that, was pleading around, you were talking about Diane,
18 correct?

19 A. Yes.

11:57:17 20 Q. Now, you indicated that when you had taken these seven
21 delegates to Gueckedou, at some point Sierra Leonean refugees
22 learned that there were RUF in the area and they became very
23 angry, correct?

24 A. Yes, at the park.

11:57:39 25 Q. And they became very angry because of the way that
26 you - the RUF mistreated civilians in Sierra Leone, correct?

27 A. No, they were angry with one man: Pa Kamara.

28 Q. They weren't just angry with one man; they were angry
29 because RUF were in their area. Isn't that right?

1 A. Yes.

2 Q. And they were angry because the RUF had killed civilians
3 and done other bad things to civilians in Sierra Leone, correct?

4 A. Yes.

11:58:30 5 Q. And then the Sierra Leone refugees alerted Guinean
6 officials and two of the delegates were arrested, correct?

7 A. Yes.

8 Q. And it was you who took these other delegates on to Danane;
9 isn't that right?

11:58:55 10 A. No. I did not take them along. I just --

11 Q. You were the one - go ahead, please. Go ahead, please.

12 A. I just put them in a vehicle and they used the other route.

13 Q. What do you mean, "they used the other route"?

14 A. There are two routes to go to the Ivory Coast, but I only
11:59:26 15 knew one. So they used the other route to go, but I stayed in
16 Gueckedou.

17 Q. And the other road that they used went through what towns?

18 A. I have never used that route, so I did not know how to
19 travel to go.

11:59:48 20 Q. How did you know they took the other route?

21 A. That was what Pa Fofana said. He said we should not use
22 the Nzerekore road.

23 Q. You were the person in charge of this mission to bring the
24 delegation from Sierra Leone to Danane, correct?

12:00:14 25 A. Yes.

26 Q. In fact, it was Foday Sankoh who had put you in charge of
27 that mission, yes?

28 A. Yes.

29 Q. And you were the person to whom he had given the finances

1 for that mission, yes?

2 A. They did not give me money, no.

3 Q. And Mr Fofana was a man who worked for you in Danane; isn't
4 that right?

12:00:47 5 A. No. The man is a businessman.

6 Q. Did Dr Sebo introduce you to Mr Fofana?

7 A. No.

8 Q. You worked with Mr Fofana in Danane, correct?

9 A. No.

12:01:07 10 Q. When Philip Palmer and Kamara were arrested by security
11 personnel, you called the Sierra Leone embassy right away, yes?

12 A. No.

13 Q. Why not?

14 A. I just took Palmer. I did not call the Sierra Leone
12:01:38 15 embassy.

16 Q. And why did you not call the Sierra Leone embassy?

17 A. Because I did not want them to see me.

18 Q. Why did you not want them to see you?

19 A. Because when I had been going to - because I had been going
12:02:01 20 to the RUF territory, so I did not want them to see me.

21 Q. But, Madam Witness, when you were talking about your own
22 arrest, you said it was you who had called the Sierra Leone
23 ambassador because when you are a stranger and you have a
24 problem, you contact the ambassador. You told the judges that in
12:02:25 25 relation to your own arrest, correct?

26 A. Yes, when they arrested me I sent - I contacted the
27 embassy. But for Palmer I did not contact the embassy.

28 Q. Madam Witness, when you were arrested you did not contact
29 the embassy. The Guinean officials contacted the embassy and

1 then Sierra Leone requested you be transferred; isn't that right?

12:03:16 2 A. Well, at that moment that I was at the CID, any Sierra
3 Leonean who came, I would tell. I did not know if it was my own
4 message that reached the embassy or it was the Guineans'. But
5 after I had been sending, later Jabbie came.

6 Q. In relation to this first group that went to Danane, you
7 worked with the NPFL in Danane to get accommodation for these
8 delegates; isn't that right?

9 A. No. There were so many empty houses there.

12:03:41 10 THE INTERPRETER: Your Honour, can she kindly repeat the
11 last bit of her answer.

12 PRESIDING JUDGE: Madam, please repeat the last part of
13 your answer.

14 THE WITNESS: I said empty houses were there in the town.
12:03:55 15 When you wanted to rent one, you would rent one. The Ivorians
16 had built houses there.

17 MS HOLLIS:

18 Q. And you worked through Musa Cisse to get the delegates
19 access to these houses, correct?

12:04:14 20 A. No. Musa Cisse - I never spoke with Musa Cisse. There
21 were houses there. Whoever wanted to rent one would do so. They
22 were there, plenty of them.

23 Q. Now, in relation to Philip Palmer's arrest, Foday Sankoh
24 instructed you to go and get Philip Palmer, correct?

12:04:42 25 A. Yes.

26 Q. And you were to use whatever means were necessary to get
27 Philip Palmer, correct?

28 A. Yes.

29 Q. And you did get him, and you took him to Danane and then

1 handed him over to the delegation that was in Danane, yes?

2 A. Yes.

3 Q. And when you were back in Danane with Philip Palmer, you
4 handed diamonds over to Charles Taylor's representative there,

12:05:20 5 Musa Cisse, correct?

6 A. No.

7 Q. And after you had taken Philip Palmer to Guinea, you - to
8 Danane, you went back to Guinea to continue your business,

9 correct?

12:05:42 10 A. Yes.

11 Q. Now, you also talked about a trip that you took into Sierra
12 Leone with Dr Sebo to get hostages who had been taken by the RUF,

13 correct?

14 A. Yes.

12:06:04 15 Q. And before we talk about that trip itself, when you told
16 the judges about this refugee camp in Danane, you said you did

17 not live in the camp, correct?

18 A. No, I was not staying there.

19 Q. And why did you not live in the camp?

12:06:30 20 A. Because I was able to pay money for a house. I had rented
21 a place.

22 Q. And at the camp - tell us again - at this camp in Danane,
23 you registered as being from where?

24 A. I said I had come from Liberia.

12:06:54 25 Q. And why in Danane did you tell them that you were a refugee
26 from Liberia?

27 A. Because I wanted to receive supplies.

28 Q. But why did you have to tell them you were from Liberia to
29 get supplies?

1 A. I do not understand.

2 Q. Well, you told them in Danane you were from Liberia. In
3 Guinea you told them you were from Sierra Leone. So why did you
4 tell them in Danane that you were from Liberia?

12:07:37 5 A. At that time, all the refugees who were in Danane had come
6 from Liberia. So when you came to Gbenda, you just had to say
7 you had come from Liberia because you were coming from Liberia.
8 And even if you were a Sierra Leonean, you would have to say you
9 came from Liberia because you had come from there.

12:08:01 10 Q. Now, you told the judges that you registered at the camp so
11 you could get supplies. What kind of supplies did you get from
12 this refugee camp?

13 A. The first supply, they gave you food and pot to cook and
14 they will give you a bucket and foodstuff, oil. At that time
12:08:29 15 they were giving blended milk. Those were the things that they
16 were supplying.

17 Q. And the foodstuffs they were giving you, did that include
18 rice?

19 A. It was there, but it was not much. They just put it in
12:08:51 20 bits.

21 Q. And how often did you receive these supplies at the refugee
22 camp?

23 A. Monthly. They supplied monthly.

24 Q. And while you were getting these supplies as a refugee, you
12:09:08 25 were doing business in Danane and the surrounding area, yes?

26 A. Yes, I was doing business.

27 Q. And you were able to pay for your children's education in
28 Danane, correct?

29 A. Yes.

1 Q. And you were able to support yourself and your family, yes?

2 A. Yes.

3 Q. And you told the judges - when the Defence counsel asked
4 you if you were able to feed yourself when you were getting these

12:09:46 5 supplies, you told the judges - and for the Court and Defence
6 counsel I am referring to 17 June, page 42808 - "But even if you
7 were able to feed yourself, that was an opportunity for you to
8 make use of, so you wouldn't let that slip through your fingers,
9 would you?" So you went there to register because you were a
12:10:15 10 businesswoman, correct, Madam Witness, and you take actions that
11 will make a profit for you, correct?

12 A. Yes.

13 PRESIDING JUDGE: There are a number of propositions in
14 there, Ms Hollis. I am not sure which of the - to which of the
12:10:37 15 propositions the witness is answering yes.

16 MS HOLLIS:

17 Q. Now, first of all, let's be clear. You do remember, do you
18 not, telling the judges that even if you were able to feed
19 yourself, that was an opportunity, that is to say, getting these
12:10:55 20 supplies, was an opportunity for you to make use of, so you
21 wouldn't let that slip through your fingers, so you went there to
22 register. You remember telling the judges that, yes?

23 A. Yes, that was what I said.

24 Q. And you did this because you were a businesswoman, correct?

12:11:18 25 A. Yes.

26 Q. And because you take actions that will make a profit for
27 you, correct?

28 A. That's it.

29 Q. Now, you told the judges that Dr Sebo was going into Sierra

1 Leone to receive hostages that the RUF had taken, correct?

2 A. Yes.

3 Q. And you told the judges that Dr Sebo just happened to come
4 up to you while you were in the refugee camp and ask you where

12:11:57 5 you had come from. Isn't that what you told the judges?

6 A. That's what I said.

7 Q. That at that time he did not know you and you did not know
8 him. Is that right?

9 A. Yes.

12:12:14 10 Q. But he just happened to come to you and then ask you if you
11 would go with him to Sierra Leone. That's what you told the
12 judges, correct?

13 A. Repeat the question.

14 Q. But he just happened to come to you and then ask you if you
12:12:36 15 would go with him to Sierra Leone. That's what you told the
16 judges, correct?

17 A. Yes.

18 Q. Now, these hostages that you were to assist him to receive
19 in Sierra Leone, you indicated that the hostages had come from
12:12:59 20 Kabala, Panguma and another place that you couldn't remember,
21 correct?

22 A. Yes.

23 Q. And the other place that you couldn't remember was actually
24 two places, yes? And one of those places was Sierra Rutile, yes?

12:13:20 25 A. Yes.

26 Q. And another of those places was Sieromco, yes?

27 A. Yes.

28 Q. So these were the places from where these hostages had been
29 taken, correct?

1 A. Yes.

2 Q. And you told the judges that when you were in Sierra Leone,
3 Dr Sebo separated from you and he went to see Foday Sankoh in
4 Zogoda, correct?

12:13:57 5 A. When he was going, he did not tell me that he was going to
6 Foday Sankoh. They just came for him and he said he was - he bid
7 farewell, so before he came back I left.

8 Q. And do you remember who it was who came for him?

9 A. At that time it was Peter Vandi who took them halfway and
12:14:22 10 he came back and other people continued. I did not know where
11 they went.

12 Q. So Peter Vandi came for him and then you said Peter Vandi
13 took him halfway and he came back and other people continued.

14 And I think you explained to the judges that what you meant was
12:14:47 15 that the way the RUF would do it is that a person or people from
16 the RUF would take someone part of the way and then another group
17 would take them the rest of the way, correct?

18 A. Yes.

19 Q. But how did you know that's the way the RUF worked?

12:15:13 20 A. When the man came back, I asked him.

21 Q. Now, you talked about the hostages - and when you say when
22 the man came back you asked him, what man did you ask?

23 A. Doctor.

24 Q. Dr Sebo?

12:15:36 25 A. Yes.

26 Q. So Dr Sebo knew the way the RUF normally worked. Is that
27 correct?

28 A. No, he was unable to give me the details as to how they
29 worked.

1 Q. Madam Witness, you knew the details because you knew how
2 the RUF was operating in Sierra Leone, correct?

3 A. I wouldn't know all.

4 Q. And Dr Sebo knew those details because he went several
12:16:13 5 times into Sierra Leone to meet with RUF there, yes?

6 A. I don't know a lot of it. Just once.

7 Q. In fact, you went with him into Sierra Leone on more than
8 one occasion, yes?

9 A. No, only once.

12:16:34 10 Q. Now, you talked about the hostages being brought and you
11 said that the release of the hostages was filmed. Is that
12 correct?

13 A. Yes. The people who came to the riverside, yes, they had.

14 Q. Now, when you were talking about filming the hostages being
12:17:00 15 handed over, you said you remained inside because you did not
16 want your face to be seen on the camera. Do you remember telling
17 the judges that?

18 A. Yes, I was there, but when I saw the camera I did not show
19 myself.

12:17:18 20 Q. Why did you not want your face to be seen on the camera?
21 Releasing these hostages, that was a good thing, wasn't it, so
22 why did you not want your face to be seen on the camera?

23 A. Because I was going around all over, so I didn't want
24 someone to see me and arrest me. That was why I was hiding.

12:17:43 25 Q. And you were hiding because of this illegal activity you
26 were involved in in Guinea, yes?

27 A. Yes.

28 Q. And were you also hiding because at that time you did not
29 want people to know that you were part of the RUF?

1 A. No.

2 Q. So it was all right with you if people outside of the RUF
3 knew that you were a part of the RUF. Is that correct?

4 A. Repeat.

12:18:17 5 Q. So it was all right with you if people who were not part of
6 the RUF knew that you were part of the RUF?

7 A. I do not understand this question.

8 Q. That's fair and I will move on from that.

9 JUDGE DOHERTY: Ms Hollis, before you move on I want to
12:18:46 10 clarify something the witness has said. At page 73, line 23, in
11 answer to a question she said- you were asking whether Dr Sebo
12 separated and went to see Foday Sankoh, et cetera. And she said:
13 "He bid farewell, so before he came back, I left," thereby giving
14 me the impression she had gone and separated completely from him.
12:19:14 15 However, in subsequent answers it appears that they met up.

16 MS HOLLIS: Thank you, Madam Justice:

17 Q. Madam Witness, when you said that after Dr Sebo had
18 separated from you, you left, where did you go?

19 A. I stayed behind. Then they came and picked him up and he
12:19:44 20 went ahead.

21 Q. So you were saying that you were left behind? Is that what
22 you were saying?

23 A. Yes.

24 Q. While Dr Sebo was separated from you, did you travel to any
12:20:03 25 other location in RUF territory?

26 A. Yes, later I and Peter Vandi went to Giema to Issa Sesay.

27 Q. And why did you go there?

28 A. When we got there in the evening, the following day they
29 brought those white men.

1 Q. Now, actually they brought those white men back to Pumudu.
2 Isn't that right?

3 A. No. We met in Giema. That was where they met me. I got
4 there in the evening and I passed the night and the following day
12:20:50 5 they got there.

6 Q. Now, which is closer to the border, Pumudu or Giema, and
7 we're talking about the border with Guinea?

8 A. It's Pumudu.

9 Q. So why did you go farther away from the border to meet
12:21:10 10 these hostages whom you were taking back to the border?

11 A. Well, at the time that those people came, it was Sam Kolléh
12 who brought them and he handed them over to Issa. And we passed
13 the night and in the morning when we were getting ready to take
14 off, they were handed over to Peter Vandi and we started walking.

12:21:38 15 Q. That's not my question, Madam Witness. My question to you
16 is this: Why did you go to Giema, which is farther away from the
17 border, to receive these hostages whom you were going to take to
18 the border? Why did you do that?

19 A. I did not just get up to do that. They just sent for me to
12:22:04 20 go to Giema.

21 Q. And did they explain why they needed your presence at
22 Giema?

23 A. At that moment they didn't tell me.

24 Q. And you didn't ask. Is that right?

12:22:19 25 A. No, I did not ask.

26 Q. And was that because Issa Sesay was a senior commander who
27 was requiring your presence?

28 A. Yes.

29 Q. Where was it that this filming took place? Was it in

1 Giema, some other place or at the border?

2 PRESIDING JUDGE: Please pause. Yes, Mr Anyah.

3 MR ANYAH: With respect, learned counsel opposite has used
4 the word "filmed" and now is using the phrase "filming". The
12:23:00 5 witness referred to not wanting her face to appear on a camera.
6 We don't know what kind of camera it is. I will find the page in
7 question. This is the transcript of the 17th and it's at page
8 42832. 17 July, 42832, lines 3 through 9. The question I posed
9 to the question:

12:23:27 10 "Q. And what happened when the Red Cross crossed into
11 Sierra Leone?

12 A. They lined up the people. By that time I was not there
13 because I was out. I did not want my face to be shown on
14 the camera, so I left."

12:23:47 15 That's the extent of the reference to camera. There is
16 another reference to camera in that transcript, a camera that the
17 witness says Dr Sebo had. I don't know that you can deduce from
18 the fact of there being a camera that it was a video camera. We
19 don't know what sort of camera it is.

12:24:06 20 PRESIDING JUDGE: But, Mr Anyah, when you were putting a
21 certain exhibit, I think it was P-277, you remember that
22 document, and I think it was in private session you were putting
23 questions to the witness, you read an excerpt whereby a recording
24 - a video recording was alluded to in that article. You will
12:24:30 25 recall. Might this not be where counsel has got the idea of
26 filming?

27 MR ANYAH: No question about it. That article referred to
28 video recordings, but it is not the same thing as saying that
29 this witness has confirmed before your Honours that there was

1 filming.

2 I read the article to the witness. The article is from
3 another source. It is not the witness's evidence. I asked the
4 witness questions about the article. If there is a part of the
12:25:00 5 transcript where the witness confirms that there was filming,
6 then that's the relevant portion of the transcript that should
7 form the basis for the question. But I am submitting to you
8 that, setting aside the article which is not information provided
9 by this witness, what has come from this particular witness is
12:25:19 10 that there was a camera present. We don't know what type of
11 camera it was.

12 PRESIDING JUDGE: Very well. Ms Hollis, how are you going
13 to proceed? What is your response?

14 MS HOLLIS: Well, I will clarify with the witness what she
12:25:32 15 knew or didn't know and that way we will know what her evidence
16 is, Madam President:

17 Q. Madam Witness, you did not want your face on the camera.
18 Do you know were they taking snaps of these people or were they
19 using a video camera?

12:25:57 20 A. The camera that Doctor had? Because when the Red Cross
21 came, they brought theirs and Doctor too had his. So I don't
22 know the type of camera that we're talking about.

23 Q. So you say the Red Cross brought theirs and the doctor too
24 had his, and you have talked about what the doctor had and you
12:26:27 25 said you didn't know exactly what it was, but that he was able to
26 take pictures of some sort with it, correct?

27 A. Yes. I saw him taking pictures. I don't - I did not know
28 whether it was videoing.

29 Q. Fair. And the Red Cross, do you know did they bring camera

1 to take snaps or did they bring video camera with them?

2 A. They came with everything. They were taking snapshots,
3 they were passing around with the thing. But when I saw that
4 movement, that was the time that I left.

12:27:11 5 Q. That's fair. And did you see them also with a video
6 camera - using a video camera?

7 A. Yes. Yes. I saw them, but I had gone to a far distance to
8 hide.

9 Q. Now, this Dr Sebo that you had brought into Sierra Leone,
12:27:41 10 he was a member of an organisation called International Alert,
11 correct?

12 A. Well, I wouldn't know the details, but I - what I know is
13 that when you have the Red Cross mark, we the refugees, honour
14 you. I did not know what type, whether it is Red Cross or that
12:28:07 15 one. That is for those who are educated.

16 Q. Well, Madam Witness, you can know things without having a
17 formal education, and you knew that Dr Sebo was a member of
18 International Alert, correct?

19 A. I did not know that Alert. I was just following the Red
12:28:32 20 Cross. That's the part I know because I had seen the symbol.

21 Q. And you knew that Dr Sebo, as a representative of
22 International Alert, was working with the RUF delegation in
23 Danane and Abidjan, correct?

24 A. I did not know that. Maybe when I left there. But at the
12:28:58 25 time that I was there, I did not see that.

26 Q. And you also knew that Dr Sebo had once been a publicist
27 for Charles Taylor. You knew that, did you not?

28 A. I don't know.

29 Q. You, Madam Witness, were also aware that Dr Sebo became a

1 very close adviser to Foday Sankoh while Foday Sankoh was in
2 Ivory Coast, correct?

3 A. I don't know. I was not there.

4 Q. And when Dr Sebo came to you, he didn't just happen upon
12:29:46 5 you. In fact, he was sent to you. Isn't that correct?

6 A. I don't know that. He did not tell me. He was asking for
7 Sierra Leone people.

8 Q. And he was sent to you specifically by Charles Taylor.
9 Isn't that right?

12:30:10 10 A. No. I don't know that.

11 Q. Indeed, you do know that. And you worked with him after he
12 initially came to you in the refugee camp, correct?

13 A. I don't understand that question.

14 Q. You do know that he was sent by Charles Taylor. Isn't that
12:30:38 15 right?

16 A. I don't know.

17 Q. And you also know that Dr Sebo was a strong supporter of
18 both Charles Taylor and Foday Sankoh. You know that, don't you?

19 A. I don't know that.

12:30:59 20 Q. Now, these hostages that you went into Sierra Leone to
21 receive, these hostages were released in April 1995. Isn't that
22 correct?

23 A. I don't know the year.

24 MS HOLLIS: Madam President, at this time I would ask that
12:31:23 25 a document be distributed. It is "Sierra Leone, Human Rights
26 Abuses and a War Against Civilians". It's an Amnesty
27 International document. We have a full copy of the report for
28 the Defence, but for your Honours, we will be looking at only
29 three pages of that report.

1 PRESIDING JUDGE: Has this report been previously
2 circulated to the Defence?

3 MS HOLLIS: I do not believe it has.

12:32:09

4 PRESIDING JUDGE: Why is this document being sprung on the
5 defence at this stage?

12:32:26

6 MS HOLLIS: Well, we are using it for impeachment. There
7 is no question of it being probative of guilt. And in
8 your Honours' ruling on the issue of what is called fresh
9 evidence, your ruling was that if it was for impeachment only,
10 there was no requirement for prior disclosure. However, I am
11 informed that indeed, contrary to what I just told you, we had
12 provided this to the Defence on 27 October 2006.

13 PRESIDING JUDGE: Mr Anyah.

12:32:50

14 MR ANYAH: Yes, Madam President, to the extent that this
15 might implicate your Honours' decision from 30 November last
16 year, I merely rise to ask for time to review it briefly in court
17 to determine that it contains no information that we could argue
18 is probative of the guilt of the accused. And it wouldn't take
19 me long, if counsel would specify which portions of the document
20 they wish to put to the witness.

12:33:12

21 MS HOLLIS: Most certainly, and we would use page 1 to
22 identify the document. And then at page 14, under "Hostage
23 taking and other abuses against captured non-combatants", we
24 would be using at the portions of the first paragraph under that
25 subheading, fourth paragraph, the sixth paragraph.

12:33:35

26 On page 15 of the document, we would be looking at portions
27 of the fourth paragraph counting down, beginning "The RUF
28 initially denied", and the fifth - portions of the fifth
29 paragraph beginning, "However, despite these demands not being

1 met". Those are the portions we would be referring to.

2 MR ANYAH: Madam President, could Mr Taylor be excused to
3 use the restroom, please?

4 PRESIDING JUDGE: Certainly, Mr Taylor may be escorted out.

12:36:30 5 MR ANYAH: Thank you.

6 [The accused not present]

7 PRESIDING JUDGE: Mr Anyah, you will indicate to us when
8 you are - you have browsed the document, please.

9 MR ANYAH: Yes, I have read it. I have read the portions
12:37:14 10 indicated to by counsel, and I don't have any objections on the
11 basis of it containing evidence going to the proof of the guilt
12 of the accused.

13 I do raise a procedural issue, though, in the sense that if
14 a document is brought before your Honours and it is said to be
12:37:33 15 used for impeachment and there is, as far as I can tell, no
16 indication of what is contrary to what the witness has said in
17 court other than the witness saying as to certain facts she does
18 not know or remember - well, I will reserve any objections I have
19 and let's see how it goes.

12:38:05 20 PRESIDING JUDGE: Do we have Mr Taylor's okay to proceed in
21 his absence?

22 MR ANYAH: I did not inquire from him, but I see that he is
23 soon due back in, so it shouldn't be a problem.

24 PRESIDING JUDGE: Ms Hollis, you may proceed to put the
12:38:25 25 portions of this document to the witness. There is no problem
26 with the judges.

27 [The accused present]

28 MS HOLLIS: Thank you, Madam President. And it is a fair
29 point that was raised by defence counsel, and I would simply

1 alert your Honours that the impeachment value of this document
2 goes to the sequence of events; in other words, what event
3 happened first, what event happened second, what event happened
4 third. That's the significance of document. Thank you,

12:38:54 5 Madam President:

6 Q. Madam Witness, I am going to read to you some portions of a
7 document that was prepared by an organisation called Amnesty
8 International. The document is entitled: "Sierra Leone, Human
9 Rights Abuses in a War Against Civilians", and the portions I am
10 going to read to you relate to the taking of the hostages that
11 you have talked to the judges about. All right, Madam Witness?

12:39:18

12 A. I am listening.

13 Q. Now I am going to page 14 of this document under the
14 subheading, "Hostage taking and other abuses against captured
15 non-combatants". And, Madam Witness, this report says that:

12:39:44

16 "Between November 1994 and January 1995 rebel forces of the
17 RUF abducted 17 foreign nationals and held them hostage,
18 demanding the withdrawal of foreign troops in Sierra Leone and an
19 end to military assistance by foreign governments as a condition
20 of their release."

12:40:11

21 Madam Witness, you were aware of the demands that the RUF
22 were making after they had abducted these hostages, correct?

23 A. I don't know.

24 Q. Madam Witness, you were a senior member of the RUF. You
25 were aware of the purpose for which the RUF had abducted these
26 hostages, weren't you?

12:40:42

27 A. I did not know. I wasn't there.

28 Q. And you knew because you had been in radio contact with the
29 RUF through Danane, correct?

1 A. At the time they were captured, I wasn't talking on the
2 radio.

3 Q. And you had also taken trips into Sierra Leone and had been
4 briefed by Foday Sankoh and others as to what the RUF was doing
12:41:24 5 and planning. Isn't that right?

6 A. No. He would not explain everything to me. It was not
7 everything that he explained to me. Whenever they wanted to send
8 me, that is what he will talk to me about. Not that he will tell
9 me everything.

12:41:50 10 PRESIDING JUDGE: Mr Anyah, you are on your feet.

11 MR ANYAH: Yes, Madam President. These questions that have
12 been put to the witness in relation to this document, we did not
13 need the document for them to be put to the witness. Questions
14 like whether in her capacity as a senior RUF official she would
12:42:11 15 have been aware of the demands that the RUF were making in
16 relation to the abducted hostages. We cannot have the process
17 procedurally be that a document is put before the witness -
18 admittedly it's fresh evidence. Forget the use that is being
19 proposed that the Prosecution wishes to make of the document. It
12:42:34 20 is a new document being used during cross-examination by the
21 Prosecution after the close of the Prosecution's case.

22 If the Prosecution says its use is to impeach or question
23 the witness about the timeline or sequence of events, that is,
24 she has said one thing to your Honours about a timeline and this
12:42:56 25 document shows another thing, that's one thing. But when it is
26 the case that the document is put before the witness to ask
27 questions that could have been asked of the witness without the
28 document being put before the witness, we submit it's not proper.
29 I mean, if the Prosecution wants to challenge --

1 PRESIDING JUDGE: What isn't proper about it?

2 MR ANYAH: What is not proper is that the document - fresh
3 evidence is being used for impeachment when there is nothing to
4 impeach. I am saying if they wish to use the document to impeach
12:43:33 5 something, we should go to the matter that's in dispute that the
6 witness has said something differently before that is to be
7 impeached. We can't just use the document simultaneously with
8 generic questions that could have been asked of the witness
9 without the document being present.

12:43:49 10 PRESIDING JUDGE: Mr Anyah, even before I give Ms Hollis a
11 chance to response, the way I see it, there is a proposition in
12 the excerpt that counsel has just read. Namely, the demands that
13 were made by the RUF. These are put down in this document by
14 Amnesty International as a fact by Amnesty, or a fact that was
12:44:15 15 found by Amnesty that these were demands.

16 Now, it is perfectly within the Prosecution's right to ask
17 the witness in her capacity then whether she was aware of these
18 demands. This goes to the credibility of the witness just like
19 the time sequence would go to the credibility of the witness.
12:44:40 20 There is nothing wrong in my view, and that is my ruling. Please
21 continue, Ms Hollis.

22 MS HOLLIS: Thank you, Madam President:

23 Q. If we could now go to the fourth paragraph:

24 "The abduction of civilians received international
12:45:02 25 publicity in November 1994 after two British nationals, both
26 volunteers with the Voluntary Service Overseas organisation, who
27 were working on rural development projects, were abducted by the
28 RUF during the attack on Kabala."

29 Now, Madam Witness, you have said that some of the hostages

1 who were released came from - were captured in Kabala, correct?

2 A. Yes, that's what the man told me.

3 Q. And you also were aware of these abductions because the
4 abductions themselves received international publicity. Isn't
12:45:55 5 that right?

6 A. I did not listen to radio, not much of it. I only heard
7 that people had been captured. I did not know the details.

8 Q. Now, it goes on to say that a number of Sierra Leoneans
9 were also abducted and I believe in your evidence you talked
12:46:26 10 about Sierra Leoneans being abducted, correct?

11 A. Yes, some people were among them.

12 Q. And it says that radio messages by members of the RUF
13 claimed that they were holding the two men and demanded arms,
14 ammunition and medicines in exchange for their release. And you
12:46:48 15 were aware of that demand, were you not, Madam Witness?

16 A. I don't know about it.

17 Q. Now, if we look at the sixth paragraph, it indicates that a
18 Swiss national was reported missing following a rebel attack near
19 Lago on the road from Kenema to Panguma on 4 January 1995. And
12:47:19 20 it's this instance that you were talking about when you said that
21 some of the hostages were from Panguma. Is that correct,
22 Madam Witness?

23 A. I don't understand this one.

24 Q. This paragraph says that a Swiss national was reported
12:47:42 25 missing following a rebel attack near Lago on the road from
26 Kenema to Panguma on 4 January 1995. Now, you have told the
27 judges that to your recollection some of the hostages were
28 captured in Panguma and I am asking you is this the instance that
29 you were talking about, the man who was captured following the

1 rebel attack near Lago on the road from Kenema to Panguma?

12:48:41 2 A. It was the same group that I came with. There was a man
3 who married a black woman, who was talking about Panguma,
4 Panguma. But I didn't even know that area. But even that Lago
5 that you are talking about, I don't know that place. It was the
6 same man who was talking about Panguma, Panguma.

7 THE INTERPRETER: Your Honours, the witness is using a word
8 that could mean dark wife or black wife. Can she explain.

12:49:03 9 PRESIDING JUDGE: Madam, did you say dark wife or black
10 wife? What did you say?

11 THE WITNESS: She was a Mende girl that was married to a
12 white man. They said they had come from Panguma.

13 MS HOLLIS:

14 Q. Now, Madam Witness, the paragraph goes on to list the names
12:49:29 15 of people among Sierra Leonean civilians who were abducted during
16 the attacks on the Sieromco and Sierra Rutile company sites on 18
17 and 19 January 1995 and it also indicates that seven foreigners
18 from Sierra Rutile and Sieromco were also abducted. And you
19 indicated today that hostages included those taken from Sieromco
12:50:07 20 and Sierra Rutile, yes?

21 A. Yes, that's what I said.

22 Q. Now, if we could look at page 15, the fifth paragraph and
23 beginning with the sentence:

12:50:40 24 "The ten other foreign nationals, Robert d'Cruz, Calum
25 Murray, Roger Graf, and those abducted from the Sieromco and
26 Sierra Rutile sites in January 1995 were handed over at the
27 border with Guinea to representatives of the International
28 Committee of the Red Cross on 20 April 1995, together with six
29 Sierra Leoneans who had also been abducted from the Sieromco and

1 Sierra Rutil sites."

2 Madam Witness, this report indicates that these hostages
3 were handed over on 20 April 1995. Madam Witness, I suggest that
4 you have confused the sequence of events in regard to your trip
12:51:37 5 to bring out the first group of the delegation and your trip with
6 Dr Sebo to get the hostages. I suggest to you that the trip to
7 get the first group of delegates occurred in December 1994 and
8 that you went with Dr Sebo to get these hostages in April 1995.

9 So that the sequence is: You take out the first group of
12:52:16 10 delegates, you come back and you take out the hostages. That's
11 what I suggest to you, Madam Witness; that you have the sequence
12 out of order.

13 Now, it's correct, is it not, that your first trip of the
14 three trips we are talking about, the trip for the first group of
12:52:42 15 delegates, the trip for the hostages, the trip for the second
16 group of delegates - it's correct, is it not, Madam Witness, that
17 the first trip was the trip to bring out the delegates including
18 Philip Palmer, and the second trip was the trip to bring out the
19 hostages? That's correct, is it not, Madam Witness?

12:53:11 20 A. No. That's not the way I did it.

21 Q. And I suggest that your memory is either faulty or you are
22 not being truthful with the Court.

23 Madam President, may I ask that this document be marked for
24 identification?

12:53:34 25 PRESIDING JUDGE: The witness didn't answer your last
26 question. Are you not interested in an answer to your last
27 question?

28 MS HOLLIS:

29 Q. Madam Witness, I want to give you the opportunity to answer

1 this question. I suggest to you that your memory in relation to
2 the sequence of these two events is either faulty or you are not
3 being truthful with the Court. What is your response to that?

12:54:24 4 A. You know, I was the one who did the walking. I did
5 everything. What I explained to you is what I know.

6 PRESIDING JUDGE: The document by Amnesty International
7 entitled "Document: Sierra Leone human rights abuses in a war
8 against civilians", and that consists of the first page and page
9 14 and page 15, that's three pages, is marked MFI-2.

12:55:01 10 MS HOLLIS: Thank you, Madam President.

11 JUDGE DOHERTY: Ms Hollis, before we move on, did the
12 witness say, "I was the one who did the walking" as with two feet
13 or, "I was the one that did the working"?

14 MS HOLLIS:

12:55:17 15 Q. Madam Witness, you have heard Madam Justice's question.
16 When you said, "I was the one who did the" something "I did
17 everything", did you say you were the one who did the walking, as
18 in walking with your two feet, or you were the one who did the
19 working? Which of those did you say, Madam Witness?

12:55:50 20 A. I walked into the place and I came outside. What I know is
21 what I told you.

22 JUDGE DOHERTY: Thank you.

23 MS HOLLIS:

12:56:05 24 Q. Madam Witness, this trip that you took into Sierra Leone to
25 bring out the hostages, this was before you had gone into Guinea
26 and met up with Philip Palmer. Isn't that right?

27 A. I don't understand.

28 Q. You went into Sierra Leone. You, with Dr Sebo, were there
29 when the hostages were released and this trip occurred before you

1 went to Conakry and met up with Philip Palmer who had been under
2 arrest, correct?

3 A. I still don't understand.

12:57:07

4 Q. What occurred first in your memory: Your trip into Sierra
5 Leone to receive the hostages, or your travel to Conakry to meet
6 up with Philip Palmer who had been under arrest? To your memory,
7 which of those events occurred first?

12:57:55

8 A. Those people had been released. I don't know. Well, I
9 don't know if at that time they had - because the time that I
10 went to pick Palmer up, the hostages, the ones that I took out,
11 they were not inside. They had come out already.

12:58:24

12 Q. Thank you. And I suggest that you took out the first group
13 of delegates, you went back in to get the hostages, and then you
14 went to get Philip Palmer. That is the sequence in which these
15 events occurred, yes?

16 A. No. That's not what obtained.

17 Q. And again, Madam Witness, I suggest that either your memory
18 is faulty, or you are not being truthful with the Court. Do you
19 have a response to that?

12:58:54

20 A. If I didn't want to say the truth, I wouldn't have come
21 here. What I know is what I am saying here.

22 Q. Madam Witness, you told the judges about going back into
23 Sierra Leone and bringing out another group of delegates whom you
24 took to Danane. Do you remember telling the judges about that?

12:59:19

25 A. Yes.

26 Q. And who were these people in this second group?

27 A. Fayia Musa, Alhaji Barrie, Philip Sannoh. They were the
28 ones I went to bring.

29 Q. And when you were talking about Alhaji Barrie in this

1 second group, Defence counsel asked you if Alhaji Barrie was RUF,
2 and you said, "In there when they capture you, you just have to
3 be where they were." What did you mean when you said that? "In
4 there when they capture you, you just have to be where they
13:00:16 5 were." What did you mean by that?

6 A. When you are captured, you have to be part of them to be
7 doing their work, whatever they tell you to do.

8 Q. And Alhaji Barrie was one of those who had been captured by
9 the RUF. Is that correct?

13:00:40 10 A. Yes.

11 Q. And you told the judges that you once again obtained false
12 papers for these three men, yes, just as you had done for the
13 other group?

14 A. Yes.

13:00:59 15 Q. And you once again bribed members of the Sierra Leone
16 Refugee Committee in Gueckedou, correct?

17 A. Yes.

18 Q. And you on this occasion took these three RUF members to
19 Danane, yes?

13:01:27 20 A. Yes.

21 Q. And it was on this occasion that you took diamonds to
22 Danane; isn't that right?

23 A. Yes, I went with diamonds.

24 Q. And you took those diamonds - once you reached Danane, you
13:01:49 25 took those diamonds and gave them to Charles Taylor's
26 representative, Musa Cisse; isn't that correct?

27 A. No.

28 Q. And Musa Cisse used the proceeds from those diamonds for
29 the assistance that he provided to the RUF external delegation;

1 isn't that right?

2 A. That wasn't what happened.

3 Q. Now, Madam Witness, you have told the judges about your
4 arrest in Guinea, and Defence counsel read an article that was

13:02:40 5 dated 30 November 1995 that talked about your arrest. And

6 indeed, it was late 1995 when you were arrested in Guinea; isn't
7 that right?

8 A. I did not know the time.

9 Q. You have told the judges that when you were arrested, you
10 had a quantity of ammunition for the RUF, yes?

13:03:03

11 A. Yes.

12 Q. And that you had obtained this ammunition from the Guinean
13 officials, correct?

14 A. Yes.

13:03:25

15 Q. Madam Witness, in fact, you had a large shipment of arms
16 and ammunition; isn't that right?

17 A. Yes.

18 Q. It wasn't just ammunition, but it was also weapons such as
19 AK-47s; isn't that right?

13:03:59

20 A. No.

21 Q. And these arms and ammunition were in fact coming to you
22 from France; isn't that right?

23 A. No. I don't even know that country. What France? I am
24 doubtful about that one.

13:04:22

25 Q. And this arrangement to receive the arms and ammunition,
26 you had worked this through a man named Pisso, correct?

27 P-I-S-S-O. You had arranged this deal through a man named Pisso;
28 isn't that correct?

29 A. I don't know the names that you have called out. I don't

1 know the people; I don't know the names.

2 Q. You know this man. He was an Ivorian that you knew in
3 Danane; isn't that right?

13:05:10

4 A. I did not make the arrangement in Danane. It was in
5 Guinea.

6 Q. And indeed, Madam Witness, you had taken this man, Pisso,
7 to meet with Foday Sankoh in 1995; isn't that right?

8 PRESIDING JUDGE: Did you say 1994, Ms Hollis?

9 MS HOLLIS: 1995, sorry:

13:05:34

10 Q. Let me repeat that. You had taken this man, Pisso, this
11 Ivorian man, to meet Foday Sankoh in 1995, correct?

12 A. No.

13 Q. This place where you were stopped and then placed under
14 arrest, this was the Koya checkpoint, correct? K-O-Y-A. That

13:06:03

15 was the place where you were stopped and arrested, correct?

16 A. Well, they just said transit. I did not know the names of
17 the places, but it was at the checkpoint.

18 Q. So, Madam Witness, your story about the arrest was
19 incorrect in several aspects, yes?

13:06:41

20 A. I don't know what you mean by I am not correct.

21 Q. Well, first of all, the materiel that you had was materiel
22 from France, not from Guinea, yes?

23 A. I don't know about France. I dealt with Guineans.

24 Q. And secondly, you dealt with Pisso, an Ivorian, to arrange
25 this deal through Guinea; isn't that right?

13:07:18

26 A. No.

27 Q. And thirdly, in addition to ammunition you had also secured
28 arms, that is to say, weapons; isn't that right?

29 A. No.

1 Q. Madam Witness, I would like to direct your attention to the
2 period of time after the junta had been forced out of Freetown.
3 And this, Madam Witness, was in February 1998 when the junta were
4 forced out of Freetown. Now, between the time that the junta
13:08:26 5 were forced out of Freetown and the time of the 6 January
6 invasion, the Government of Sierra Leone had indicated that it
7 was willing allow certain high ranking members of the junta to go
8 into exile; isn't that right, Madam Witness?

9 A. I don't know.

13:08:58 10 Q. And you know about that because it was part of a public
11 news announcement indicating that the Government of Sierra Leone
12 was willing to do this, correct?

13 A. I don't understand that. I don't know that.

14 Q. The Government of Sierra Leone publicly announced that it
13:09:28 15 was willing to do this; isn't that right?

16 A. I said I don't know about that, because I didn't go
17 anywhere.

18 Q. And you heard this on the news, didn't you?

19 A. I did not hear it.

13:09:50 20 Q. And in fact, it was President Kabbah who had announced that
21 his government was considering offering amnesty for five key
22 rebel leaders if they would lay down their arms and agree to
23 leave Sierra Leone for a period of time. You heard that, didn't
24 you, Madam Witness?

13:10:22 25 A. I said I didn't hear that.

26 Q. This was a matter that was of significance to you, because
27 you were a high ranking member of the RUF, correct?

28 A. I did not hear it.

29 Q. And among the five who were - well, the five who were

1 identified as the potential recipients of this amnesty were

2 SAJ Musa, Sam Bockarie, Eldred Collins, Denis 'Superman'.

3 Mingo, and AFRC chairman Major Johnny Paul Koroma. And you
4 heard that, didn't you, Madam Witness?

13:11:17 5 A. I did not hear it. I don't understand that area.

6 Q. And President Kabbah said he would be willing to consider
7 allowing these five men to depart to a third country that is not
8 neighbouring Sierra Leone for awhile. You really did hear that,
9 didn't you, Madam Witness?

13:11:44 10 A. I don't know that because these were not people that I
11 lived with. I don't know.

12 Q. Madam Witness, you listened to the news and the radio a lot
13 more than you are willing to tell these judges. Isn't that
14 right?

13:12:10 15 A. At that time I did not have a radio. It's not all the time
16 that I would be close to the radio. In the morning we would have
17 to go and look for something to eat, so I wasn't listening to
18 radio regularly.

19 Q. In fact, Madam Witness, you knew that in this announcement
13:12:31 20 President Kabbah had indicated that he would be willing to later
21 allow these people to be resettled in Sierra Leone. You heard
22 that, didn't you?

23 A. I don't know that area. I don't know about it.

24 Q. And, Madam Witness, this offer from President Kabbah
13:12:57 25 occurred in November 1998, yes?

26 A. I don't know.

27 Q. And this was a very important development for both the RUF
28 and the former SLA who had been part of the junta, yes?

29 A. I don't know that one.

1 MS HOLLIS: Madam President, I would ask that another
2 document be distributed. It is Sierra Leone News, November 1998,
3 19 November. It consists of two pages.

4 PRESIDING JUDGE: Yes, Mr Anyah.

13:14:23 5 MR ANYAH: I am just asking to have a copy of the document.

6 MS HOLLIS: For your Honours and counsel's information, I
7 will refer to the last paragraph on page 1, that continues
8 through the fifth line on page 2 ending with "Kabbah told the
9 BBC."

13:16:00 10 PRESIDING JUDGE: Mr Anyah, I take it that you don't have
11 an objection to the reference of counsel to the part she has
12 indicated.

13 MR ANYAH: I don't have an objection, but I raise the same
14 issue I raised before. There is a procedural problem in our
13:16:17 15 submission here because there has to be something that is to be
16 impeached before new documents are just introduced in court.
17 What is impeaching vis-a-vis the evidence - Madam President, the
18 witness has her hand up.

19 PRESIDING JUDGE: Yes, Madam Witness?

13:16:37 20 THE WITNESS: I want to use the Ladies'.

21 PRESIDING JUDGE: Let the witness be escorted out.

22 Mr Anyah, you raised a point earlier that I overruled. Are
23 you raising the same point?

24 [In the absence of the witness]

13:16:57 25 MR ANYAH: It is the same point, but we are dealing with a
26 different document and perhaps my arguments might be more
27 persuasive in this context. If this document is being introduced
28 to impeach evidence of the witness vis-a-vis what she did not
29 hear on the radio, then I am submitting it's not acceptable. The

1 witness has said she did not listen to the radio all the time.

2 This document appears to be being brought before the Court to
3 establish the notoriety of a particular set of events. These
4 events could have been testified to by Prosecution witnesses
13:17:42 5 during their case in chief. Me and the witness did not cover
6 these issues, this amnesty proposed by President Kabbah, during
7 her examination-in-chief.

8 So what is the foundation for this use of this document for
9 impeachment? They don't require foundation for regular

13:18:03 10 cross-examination questions, but when they come before
11 your Honours and there is a decision saying if fresh evidence is
12 going to be used, they have to indicate if it is for impeachment
13 or if it is for substantive use, that is, it might implicate the
14 guilt of the accused, there is a preliminary question they must

13:18:22 15 address. They must tell your Honours what the necessity for the
16 use of the document is.

17 Now, what is this impeaching about the witness's evidence?
18 The witness says she didn't listen to the radio all the time, she
19 doesn't know about this. Now we are going to use this document
13:18:40 20 to establish facts, factual events, all in the purported view of
21 impeaching the witness. But what are we impeaching? It cannot
22 be that - well, I have made my point and I am in the Court's
23 hands.

24 [In the presence of the witness]

13:18:59 25 PRESIDING JUDGE: Ms Hollis, I would like to hear your
26 response to this objection.

27 MS HOLLIS: Thank you, Madam President. It is for
28 impeachment. And I guess it's all right to make my comments in
29 the presence of the witness. The Prosecution's position is that

1 this witness has consistently throughout her testimony
2 understated to your Honours what she was aware of in terms of
3 planning by the RUF, by the junta, activities of the RUF and the
4 junta, and events that occurred and impacted on the junta, the
13:19:42 5 RUF and AFRC components of the junta. When it suits her purpose
6 she indicates she has no knowledge of something, although in
7 other instances she indicates that she does have knowledge of
8 things.

9 We suggest that she is not being truthful with your Honours
13:20:01 10 when she professes a lack of knowledge of significant events.

11 This statement to BBC in November 1998 was a very significant
12 event because it impacted the very senior leadership of both the
13 RUF and the SLA components of the prior junta. And we suggest
14 she is not being truthful to you. This is something that was
13:20:31 15 said to the BBC. It is something that would have been of
16 particular significance to this woman who is a very senior and
17 respected member of the RUF. So that is the reason we wish to
18 use this document for impeachment purposes, Madam President.

19 [Trial Chamber conferred]

13:20:49 20 PRESIDING JUDGE: We are unanimously of the view that this
21 is a proper document to put to the witness at this stage in the
22 manner that counsel for the Prosecution has indicated and that
23 there is nothing irregular in what she is doing. So the
24 objection is overruled in this case and, Ms Hollis, please
13:21:39 25 continue.

26 MS HOLLIS: Thank you, Madam President:

27 Q. Madam Witness, the document that we are looking at is an
28 excerpt from the Sierra Leone News Archive for November of 1998
29 and in particular the date of 19 November. We are looking at a

1 portion of the last paragraph on the first page and the first few
2 lines on the next page. The entry says this, Madam Witness:

3 "President Kabbah raised the possibility Thursday of an
4 amnesty for five key rebel leaders if they would lay down their
13:22:28 5 arms and agree to leave Sierra Leone for a period of time. In an
6 ECOMOG security briefing, Chief of Defence Staff
7 Brigadier-General Maxwell Krobe identified the five as Captain
8 SAJ Musa, Sam 'Maskita' Bockarie, Eldred Collins, Denis
9 'Superman' Mingo, and AFRC chairman Major Johnny Paul Koroma.

13:23:01 10 Kabbah said he would be willing to consider allowing them to
11 depart 'to a third country that is not neighbouring Sierra Leone
12 for while,' and to later be resettled in Sierra Leone."

13 And this is a quote from President Kabbah:

14 "'But I cannot do that as long as they go on committing the
13:23:25 15 crimes that they have been committing and chopping off people's
16 limbs and all the rest of it, burning homes, and above all always
17 threatening, just a bluff, bluffing that they are going to kill
18 everything in this country,' Kabbah told the BBC."

19 Now, Madam Witness, you in fact heard the broadcast where
13:23:51 20 this was reported. Isn't that right?

21 A. At that time I didn't even have a radio of my own.

22 Q. And it was something that you would have been particularly
23 interested in because you were a senior leader of the RUF and
24 this article is talking about giving basically exile, amnesty, to
13:24:20 25 senior leaders of the RUF, Sam Bockarie, Eldred Collins and Denis
26 Superman Mingo. That was of particular concern to you as a
27 senior member of the RUF, wasn't it?

28 A. I did not pay attention to that. I did not hear it. At
29 that time things were difficult for me. I did not hear that. I

1 did not even have a radio.

2 Q. I suggest to you, Madam Witness, that you did pay attention
3 to this because of your status as a senior member of the RUF and
4 that you are not being truthful to this Court when you tell them
13:25:02 5 you were not aware of this?

6 A. I disagree. What I know, which is the truth, that is what
7 I have told you. At that time things were difficult. You know
8 in the morning I would have to go to sell my potatoes. I was not
9 going to listen to radio. I did not hear that.

13:25:32 10 MS HOLLIS: Madam President, I would ask that this be
11 marked for identification.

12 PRESIDING JUDGE: The document entitled "Sierra Leone News"
13 of November 19, 1998, consisting of portions of page 1 and page 2
14 is marked MFI-3.

13:25:54 15 MS HOLLIS: Thank you, Madam President:

16 Q. Madam Witness, you were aware, weren't you, that in the
17 middle of December of 1999 Sam Bockarie left the RUF and went to
18 Liberia to Charles Taylor? You were aware of that, weren't you?

19 A. Yes, that one, I heard it.

13:26:26 20 Q. And after Sam Bockarie left the RUF and went to
21 Charles Taylor in Liberia, Issa Sesay was the most senior
22 commander under Foday Sankoh, correct?

23 A. Yes.

24 Q. Issa Sesay was one of the RUF responsible for carrying out
13:26:54 25 a massacre in Luawa Chiefdom; isn't that right?

26 A. That one, I wasn't there.

27 Q. But you --

28 A. I don't know about it.

29 Q. Well, Madam Witness, you do know about it, don't you? And

1 this was the massacre of civilians in Giehun; isn't that right?

2 A. I don't know about it.

3 Q. And you were made aware of what happened to these civilians
4 in Giehun, weren't you?

13:27:43 5 A. No, I don't know.

6 Q. And you were made aware of the fact that Issa Sesay and Sam
7 Bockarie were the main commanders involved in these executions?
8 You were made aware of that fact, were you not?

9 A. No, I wasn't informed.

13:28:09 10 Q. When you were in Kono and you had three people working for
11 you diamond mining in Kono, this was the time that Issa Sesay was
12 the leader of the RUF; is that correct?

13 A. Yes.

14 Q. And do you know how long Issa Sesay had been the leader of
13:28:48 15 the RUF when you were in Kono having these people mine diamonds
16 for you?

17 A. No, I don't remember.

18 PRESIDING JUDGE: Incidentally, on that point, Ms Hollis -
19 I should have raised this earlier - but the witness earlier did
13:29:16 20 state that she had three boys mining for her - this is at page 10
21 of the transcript - and I should have asked what she meant by
22 boys in terms of age.

23 MS HOLLIS:

24 Q. Madam Witness, you have heard Madam President's question.
13:29:34 25 When you said you had three boys mining for you, how old were
26 these boys who were mining for you?

27 A. They were young men. Two of them were married; one of them
28 was not married.

29 Q. And the one that was not married, how young was he?

1 A. He just didn't want to get married, but he was old enough
2 to get married because he had girlfriends.

3 Q. Thank you, Madam Witness. Madam Witness --

13:30:18

4 PRESIDING JUDGE: In view of the time, I think we will take
5 our luncheon break now and reconvene at 2.30.

6 MS HOLLIS: Thank you.

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

8 [Upon resuming at 2.34 p.m.]

9 PRESIDING JUDGE: Mr Anyah, you are on your feet.

14:34:41

10 MR ANYAH: Yes, Madam President, good afternoon. I merely
11 rise to indicate a change of appearance on the Defence bar.
12 We've been joined by Mr Terry Munyard and Ms Logan Hambrick.
13 Thank you.

14 PRESIDING JUDGE: Ms Hollis, please continue.

14:35:12

15 MS HOLLIS: Thank you, Madam President. And the
16 Prosecution would also note a change of appearance. We have been
17 joined by Kathryn Howarth.

18 PRESIDING JUDGE: That is noted.

19 MS HOLLIS:

14:35:27

20 Q. Madam Witness, you told this Court that after the Lome
21 Peace Agreement was signed you went from Buedu to Monrovia and
22 you told the Court that in Foya you boarded a UN aircraft which
23 took you to Monrovia, correct?

24 A. Yes.

14:35:51

25 Q. And you were able to board that UN aircraft because your
26 trip to Monrovia was an official RUF trip. Isn't that right?

27 A. No.

28 Q. You also told the judges that you came back from Monrovia
29 on one of two aircraft which had been provided so that Foday

1 Sankoh and Johnny Paul and their entourage could return to Sierra
2 Leone. Do you remember telling the judges that?

3 A. Yes. I went with Foday Sankoh.

14:36:41

4 Q. And you told the judges that you remained in Freetown for
5 some time after you returned and then at some point Foday Sankoh
6 sent you to the Kambia District to settle disputes in Kambia,
7 yes?

8 A. Yes.

14:37:03

9 Q. And is it right that you also told the judges that while
10 you were in Kambia District on this mission that your area was
11 subjected to shelling from Guinea?

12 A. Yes.

13 Q. That shelling from Guinea was in response to an RUF attack
14 on Guinea which was launched from Kambia District, yes?

14:37:40

15 A. Repeat the question.

16 Q. Certainly. That shelling from Guinea was in response to an
17 RUF attack on Guinea which was launched from the Kambia District,
18 correct?

19 A. Yes, because I saw a lot of soldiers.

14:38:11

20 Q. And these were RUF who were going into Guinea from Kambia
21 District, yes?

22 A. Yes, I was seeing them.

23 Q. And when they went into Guinea on this occasion they also
24 engaged in looting in Guinea. Isn't that right?

14:38:40

25 A. As soon as they started I left.

26 Q. And, Madam Witness, is it correct that you told the judges
27 that after Foday Sankoh came back to Freetown from Monrovia, at
28 some point he again travelled out of Sierra Leone? Did you tell
29 the judges that?

1 A. Yes.

2 Q. When you were in Kambia District and this shelling was
3 going on and the RUF had attacked Guinea, was this after
4 Mr Sankoh had gone out of the country again?

14:39:34 5 A. No.

6 Q. It was --

7 A. Because I went to Kambia - the Pa was already in Freetown
8 before I went to Kambia.

9 Q. So Foday Sankoh had travelled out of the country and come
14:39:50 10 back before you went to Kambia?

11 A. Yes.

12 Q. And this shelling and the RUF attack on Guinea, was this
13 before Foday Sankoh was arrested in Freetown?

14 A. At that time Foday Sankoh had been arrested in Freetown.

14:40:16 15 Q. He had already been arrested in Freetown when this
16 occurred. Is that right?

17 A. Yes.

18 Q. So Foday Sankoh sent you to the Kambia District to settle
19 this dispute, and during the time that you were there, Foday
14:40:35 20 Sankoh was arrested. Is that correct?

21 A. Yes.

22 Q. Madam Witness, in 2002 you continued to be a very senior
23 member of the RUF. Isn't that right?

24 A. Yes.

14:40:59 25 Q. And in the middle of January, in 2002, in fact, you were
26 one of the RUF leaders who was selected to take part in meetings
27 with the Government of Sierra Leone, correct?

28 A. I was selected at one time and we went to Magburaka, but I
29 did not understand the English that they were speaking.

1 Q. Well, this meeting was between the RUF and the Government
2 of Sierra Leone and you were one of the RUF delegation to that
3 meeting, correct?

4 A. In Sierra Leone?

14:41:51 5 Q. Yes.

6 A. Yes.

7 Q. Were these meetings called the tripartite talks?

8 A. No. It was a meeting whereby UNOMSIL people were there,
9 government people were there as well as RUF people. It was a big
10 meeting wherein the population was huge.

14:42:24

11 Q. And, Madam Witness, this meeting, you were part of a
12 16-member RUF delegation, correct?

13 A. I said I was at a meeting in Magburaka. That's what I'm
14 saying.

14:42:47

15 Q. And Omrie Golley was the leader of the RUF delegation at
16 this meeting, correct?

17 A. No, during the first one I did not see Omrie Golley there,
18 the first meeting that I went to.

19 Q. And there was another meeting where you were present and
20 Omrie Golley was the leader of the RUF delegation, correct?

14:43:09

21 A. Yes.

22 Q. And other members of the RUF delegation included Jonathan
23 Kposowa, Agnes Manning, yes?

24 A. Agnes Mani?

14:43:43

25 Q. Agnes Manning, M-A-N-N-I-N-G?

26 A. I don't know that name.

27 Q. What was your role during this meeting, Madam Witness?

28 A. They just summoned people to go there. You would go there
29 and sit down. You wouldn't say anything; they would just speak

1 and you would disperse.

2 Q. And this meeting occurred just before President Kabbah
3 declared a formal end to the conflict in Sierra Leone, correct?

4 A. I do not understand that part.

14:44:34 5 Q. Do you remember that in January of 2002 President Kabbah
6 declared a formal end to the conflict in Sierra Leone? Do you
7 remember that happening?

8 A. I can't recall that time.

9 Q. All right. Madam Witness, the activities that you have
14:45:06 10 described to this Court, you have engaged in those activities
11 because of your loyalty to Foday Sankoh and to Charles Taylor,
12 correct?

13 A. The order - I was loyal to Foday Sankoh, but I was not
14 working directly with Charles Taylor. I was working with the
14:45:36 15 market.

16 Q. And you were loyal to Charles Taylor, were you not?

17 A. No, I never spoke with him.

18 Q. You also engaged in these activities so you could make a
19 profit, correct?

14:45:57 20 A. What type? I do not understand.

21 Q. All of these activities that you have described: Your
22 market activities; your travel around the NPFL-controlled areas
23 in Liberia; your travel to Ivory Coast and Guinea; your trips in
24 and out of Sierra Leone; all of those activities you have
14:46:23 25 described was also so that you could make a profit, correct?

26 A. Yes, but that was business.

27 Q. And in relation to your trip into Sierra Leone with
28 Dr Sebo, you indicated that you went to Sierra Leone because you
29 were a businesswoman and you knew if you went there you would

1 have some money, correct?

2 A. Yes.

3 Q. And in relation to charging the 700,000 Guinean francs for
4 bringing the delegation into Guinea, you indicated that because
14:47:13 5 you're a businesswoman whatever you engaged in, you should
6 realise some profit, correct?

7 A. Yes.

8 Q. And in relation to taking these delegations from Sierra
9 Leone to Danane, that you also were, in part, motivated by making
14:47:34 10 a profit out of them. Isn't that right?

11 A. Yes.

12 Q. So your actions were motivated both by loyalty and your
13 desire to make a profit, correct?

14 A. Divide the question.

14:47:58 15 Q. Your actions were motivated by loyalty, correct?

16 A. Loyal to who?

17 Q. You tell me.

18 PRESIDING JUDGE: Ms Hollis, I think the proposition is
19 coming from you. So if the witness has asked you to clarify
14:48:22 20 loyalty to whom, I think the burden is on you to say loyalty to
21 whom.

22 MS HOLLIS: Fair enough:

23 Q. The loyalty I'm talking about is your loyalty to both Foday
24 Sankoh and to Charles Taylor. Isn't that right?

14:48:40 25 A. I was not loyal to two people. I was loyal to Foday
26 Sankoh.

27 Q. And your loyalty to Charles Taylor and the RUF, correct?

28 A. I was not loyal to Charles Taylor. I was loyal to Foday
29 Sankoh and the RUF fighters.

1 Q. The activities you have described to this Court served the
2 interest of both Charles Taylor and Foday Sankoh. Isn't that
3 right?

4 A. I did not know whether he was between them. I just knew
14:49:25 5 that the RUF fighting was owned by Foday Sankoh.

6 Q. When you say, "I did not know whether he was between them,"
7 what do you mean?

8 A. Because I did not see anything. I didn't know anything, so
9 I didn't know whether it was the two of them who made the plot to
14:49:49 10 make profit. I don't know that.

11 Q. You knew that very well, didn't you, Madam Witness?

12 A. I don't know.

13 Q. And it was appropriate that you served both Charles Taylor
14 and Foday Sankoh because they were good friends, yes?

14:50:13 15 A. When I am speaking, I said I was working directly with the
16 RUF people. So if you are adding Charles Taylor's business
17 there, that confuses me.

18 Q. It doesn't confuse you at all; you simply won't admit to
19 it. Isn't that right, Madam Witness?

14:50:37 20 A. Repeat the question.

21 Q. It doesn't confuse you at all; you simply won't admit to
22 it. Isn't that right, Madam Witness?

23 A. If I don't know something, I won't talk about it. I don't
24 know.

14:50:57 25 Q. You were aware that Charles Taylor and Foday Sankoh had
26 known each other for a long time, correct?

27 A. I don't know.

28 Q. Indeed, you were aware that they had known each other since
29 before Charles Taylor brought the revolution to Liberia, yes?

1 A. I don't know.

2 Q. And Charles Taylor and Foday Sankoh both made you aware of
3 their friendship. Isn't that right?

4 A. No.

14:51:44 5 Q. As you travelled between Danane and the RUF territory in
6 Sierra Leone, you carried diamonds from the RUF to Danane for
7 Charles Taylor. Isn't that correct?

8 A. No.

9 Q. And this freedom that you had to move wherever you wished
14:52:07 10 in Charles Taylor-controlled territory in Liberia, to travel
11 where you wished to Guinea and Ivory Coast from
12 Charles Taylor-held territory, to travel in and out of Sierra
13 Leone as you wished, all of this freedom of movement was because
14 you were working for both Charles Taylor and Foday Sankoh,
14:52:32 15 correct?

16 A. That was not how it happened. I was not going around
17 freely like that.

18 Q. And this freedom of movement was also because your actions
19 were benefitting both of these leaders. Isn't that correct?

14:52:53 20 A. I did not benefit from two leaders. I benefitted from one
21 leader.

22 Q. You attended meetings with Johnny Paul in Monrovia, with
23 Foday Sankoh in Monrovia --

24 PRESIDING JUDGE: Please pause, Madam Prosecutor. I
14:53:12 25 suspect from the witness's answer that the right question was not
26 put to her. She responded by saying, "I did not benefit from the
27 two leaders." But the question you put was that the two leaders
28 were benefitting from her actions.

29 MS HOLLIS: Thank you, Madam President.

1 PRESIDING JUDGE: I don't know what was put to her in
2 interpretation.

3 MS HOLLIS: Madam President, thank you very much:

4 Q. Madam Witness, let me ask you again. This freedom of
14:53:41 5 movement that you enjoyed was also because your actions were
6 benefitting both of these leaders. Isn't that correct?

7 A. I was not benefitting from two leaders.

8 Q. Madam Witness, what I am putting to you is that you were
9 allowed to move as you wished because what you were doing was a
14:54:11 10 benefit to both Foday Sankoh and to Charles Taylor. That is
11 correct, is it not?

12 A. No.

13 Q. And your meetings - your ability to attend meetings with
14 Johnny Paul in Monrovia, with Foday Sankoh in Monrovia, and to
14:54:36 15 attend a meeting with Foday Sankoh, Johnny Paul and
16 Charles Taylor all together in Monrovia, your ability to attend
17 all of these meetings was because of the close relationship you
18 had with all three of these leaders. Correct?

19 A. Repeat your question. Now you've put three leaders there.
14:55:04 20 That confuses me. Repeat it and explain it well for me to
21 understand.

22 Q. All right. You talked about meeting with Johnny Paul in
23 Monrovia, correct? Did you hear the question, Madam Witness?

24 A. What did you say?

14:55:34 25 Q. Well, I think the interpreter did interpret for you, but
26 let's try again. You talked about meeting with Johnny Paul in
27 Monrovia, correct?

28 A. Yes.

29 Q. You talked about meeting with Foday Sankoh in Monrovia,

1 correct?

2 A. No, I met with Foday Sankoh at Robertsfield.

3 Q. You also told these judges that you went to where he was
4 staying and saw him at his lodging in Monrovia. Isn't that

14:56:10 5 right?

6 A. Yes.

7 Q. So you met with Foday Sankoh in Monrovia, correct?

8 A. Yes.

9 Q. And you also told these judges about being one of a very

14:56:25 10 small number of people who were invited to attend a meeting with

11 Johnny Paul, Foday Sankoh and Charles Taylor, yes?

12 A. Yes.

13 Q. Now, your ability to meet with all three of these

14 individuals was because of your close relationship with all three

14:56:49 15 of these individuals, correct?

16 A. I was not close to Charles Taylor. But those two men, I

17 was close to them.

18 Q. When you were in Sierra Leone, you considered yourself part

19 of the RUF, correct?

14:57:17 20 A. Yes.

21 Q. And when you were in Charles Taylor territory, you

22 considered yourself part of the NPFL, correct?

23 A. When it started initially we were under the NPFL, but when

24 I saw my Sierra Leonean people, then I turned the other area - to

14:57:42 25 the other area.

26 Q. You went to Sierra Leone, you came back from Sierra Leone

27 to Harbel and when you came back you considered yourself to be

28 part of the NPFL. Isn't that correct?

29 A. No.

1 Q. Madam Witness, do you remember on 17 June - and this is at
2 page 42780, 42781 - you were asked, "Did you during that period
3 of time" - and Defence counsel was talking about the time you
4 were in Sierra Leone, the visit you made after the war had
14:58:46 5 started in Sierra Leone:

6 "Q. Did you during that period of time consider yourself
7 to be a member of the RUF?

8 A. Yes, yes, at that time yes, because when I was in
9 Sierra Leone, at that time I was a member there because I
14:59:04 10 was there and I was moving freely."

11 And then the Defence counsel asked you, and this is
12 starting at line 22:

13 "Q. When you left Sierra Leone and came back to Liberia
14 and you returned to Harbel, took up your position as
14:59:23 15 superintendent at the market, and the ECOMOG jets came and
16 bombed the football field, at that time did you consider
17 yourself a member of the RUF?

18 A. No."

19 And then on the next page, 42781 starting at line 2:

14:59:46 20 "Q. Madam Kallon, when you were in Gbarnga, having left
21 Harbel, did you consider yourself a member of the RUF?

22 A. At that time I was not saying it any longer, because I
23 did not hear anything that was going on across there. I
24 wasn't talking about RUF longer; it was only about the
15:00:07 25 NPFL."

26 And you continue to explain and at line 10 through 12 you
27 say:

28 "I had a feeling that RUF had died because we are not
29 hearing about it. I was just in the NPFL now."

1 So, Madam Witness, when you were in Liberia, you considered
2 yourself part of the NPFL, yes?

3 A. The problem - when I was in Liberia, I was in the market
4 area, so I don't know how you see that.

15:00:56 5 Q. Well, I'm just repeating your words, but the record speaks
6 for itself. Now, Madam Witness, it made perfect sense at the
7 time that you were serving both Charles Taylor and Foday Sankoh
8 because in most ways the RUF and the NPFL were simply two sides
9 of the same organisation. Isn't that correct?

15:01:33 10 A. No, that was not how it happened.

11 Q. And when you say "no", Madam Witness, you are simply not
12 being truthful to this Court, are you?

13 A. What I know is what I have come here to talk about.

14 Q. The diamonds that you took from Sierra Leone, those
15:01:54 15 diamonds were given to you in 1995, correct?

16 A. They gave me diamonds, but I do not know the date.

17 Q. Now, you recall, do you not, a time when the RUF were
18 moving toward Freetown, and this was before Johnny Paul took
19 over, and the RUF were moving toward Freetown and they took
15:02:27 20 control of diamond mining areas in Sierra Leone? You remember
21 that, don't you?

22 A. I did not see any diamond.

23 Q. That's not what I'm asking you, Madam Witness. You recall,
24 do you not, a time before the Johnny Paul government took over
15:02:49 25 that the RUF were moving toward Freetown and they took control of
26 diamond mining areas in Sierra Leone? You recall that happening,
27 don't you?

28 A. At that time I was in Freetown, so I did not know what went
29 on there.

1 Q. I suggest that you did and you simply don't want to admit
2 it. Now, we have talked about the diamonds you were given to
3 take out of Sierra Leone and you have said that you never gave
4 any of those diamonds to the civilians of Sierra Leone. The
15:03:32 5 money that you got for those diamonds, did you give any of that
6 money to the civilian population of Sierra Leone?

7 A. The diamonds that I handled, they only gave me diamonds
8 once. That's what I know.

9 Q. In fact, there was more than one occasion that you were
15:03:56 10 given diamonds. Isn't that correct?

11 A. The diamonds that I handled, it was only once.

12 Q. And the money that you got for those diamonds, did you give
13 any of that money to the civilian population of Sierra Leone?

14 A. The diamonds that I handled that I sold, that was the money
15:04:24 15 that was taken away by the Guineans.

16 Q. You gave none of that money to the civilians of Sierra
17 Leone, correct?

18 A. I was unable to go back. All the money was left in Guinea.

19 Q. If you had been able to go back, you would not have
15:04:47 20 returned with that money to Sierra Leone, would you?

21 MR ANYAH: Madam President, I object to the question. It
22 calls for speculation.

23 MS HOLLIS: She's the one who is going back. She doesn't
24 have to speculate about she would have done with it.

15:05:05 25 PRESIDING JUDGE: I think I will allow the question.

26 MS HOLLIS:

27 Q. Madam Witness, if you had been able to go back to Sierra
28 Leone, you would not have returned to Sierra Leone with that
29 money, would you?

1 A. No --

2 THE INTERPRETER: Your Honours, can she repeat this answer
3 again slowly.

4 PRESIDING JUDGE: Madam Witness, can you repeat your
15:05:35 5 evidence slowly? The interpreter didn't understand what you
6 said. Please repeat your answer.

7 THE WITNESS: If I had gone to Sierra Leone, I wouldn't
8 have taken a lot of money any longer except the profit. That
9 would have been the one that I would have taken along.

15:05:58 10 MS HOLLIS:

11 Q. And that profit you would have kept for yourself, wouldn't
12 you?

13 A. I used to buy some things, because when I used to go,
14 people used to ask me for those little things.

15:06:16 15 Q. That profit, the great bulk of that profit you would have
16 kept for yourself. Isn't that right?

17 A. I said I wouldn't have kept everything. I would have taken
18 some and distributed it to those people, those who would have
19 come to visit me.

15:06:41 20 Q. And you would have kept the great bulk of that profit.
21 Isn't that right?

22 A. Yes.

23 Q. The RUF was never elected to be the Government of Sierra
24 Leone, was it?

15:07:00 25 A. I do not understand.

26 Q. Well, Madam Witness, you understand about elections, don't
27 you?

28 A. Yes.

29 Q. The RUF were never elected to be the Government of Sierra

1 Leone, were they?

2 A. No, I did not hear that.

3 Q. And even when the RUF were allowed to participate in
4 elections, they didn't win any seats in Sierra Leone, did they?

15:07:38 5 A. No, I did not hear that.

6 Q. And the RUF came into Sierra Leone and took over control of
7 areas through violence, correct?

8 A. Repeat the question.

9 Q. Certainly. And the RUF came into Sierra Leone and took
15:08:08 10 over control of areas through violence, correct?

11 A. Yes.

12 Q. Because the RUF realised that power lay in the barrel of
13 the gun. Isn't that right?

14 A. That's it. That's it, yes.

15:08:38 15 Q. And, Madam Witness, from the very beginning of the invasion
16 into Sierra Leone, you were an important part of the RUF's
17 violence in Sierra Leone, correct?

18 A. I do not understand.

19 Q. From the very beginning you took part in violence against
15:09:11 20 civilians in Sierra Leone, including looting. Isn't that right?

21 A. I did not take part in looting.

22 Q. And you took part in forcing civilians to perform different
23 tasks for the RUF. Isn't that right?

24 A. I was not in that area.

15:09:38 25 Q. You were in that area and you knew that civilians were
26 being forced to produce food and that the RUF was controlling
27 that food and yet you set up the market system in Sierra Leone,
28 correct?

29 A. You have doubled the question. Which one do you want me to

1 answer?

2 Q. Well, I think you can answer both, but we'll break it down.

3 You knew that civilians were being forced to produce food, yes?

4 A. Yes.

15:10:18 5 Q. That the RUF was controlling that food, yes?

6 A. Yes, they were in control of them.

7 Q. And yet you set up the marketing system that allowed them
8 to sell that food, correct?

9 A. What type of food?

15:10:42 10 Q. Any type of food, Madam Witness.

11 A. But in the market, only civilians came there to sell their
12 goods.

13 Q. And you told the leader of these markets that they should
14 give money to the RUF commanders when the commanders came there

15:11:06 15 to request money. Isn't that right?

16 A. Yes.

17 Q. And you arranged so that ammunition could be given to the
18 RUF so that they could continue to control areas of Sierra Leone.

19 Isn't that right?

15:11:25 20 A. No, I did not pass that command.

21 Q. I didn't say anything about a command, Madam Witness. I
22 said you arranged that ammunition could be given to the RUF so
23 that they could continue to control areas of Sierra Leone. Isn't
24 that right?

15:11:45 25 A. Yes.

26 Q. And even with your knowledge of the continuing serious
27 crimes against civilians that the RUF were committing in Sierra
28 Leone, you continued to be a loyal senior member of the RUF.

29 Isn't that right?

1 A. Yes, because I had been in it, so I couldn't get out at the
2 time.

3 Q. You were in Guinea, you were in Ivory Coast. You could
4 have gotten out any time you wanted to. Isn't that right?

15:12:26 5 A. No, in the latter days when I was in Freetown, that's when
6 I'm talking about.

7 Q. And throughout that time you continued - throughout the
8 time you were in Liberia, in Ivory Coast, Guinea, travelling in
9 and out of Sierra Leone, you continued to support the RUF's

15:12:51 10 violent control of areas of Sierra Leone. Isn't that right?

11 A. No, I was not supporting them for the violence. I was just
12 with them to make my own way.

13 Q. And throughout that time you also continued to support
14 Charles Taylor's efforts both in Liberia and Sierra Leone. Isn't
15:13:16 15 that right?

16 A. I was no longer in Liberia. I was now out.

17 Q. And throughout that entire time you personally profited
18 from all of the crimes that were committed against civilians in
19 Sierra Leone. Isn't that right?

15:13:41 20 A. What type of profit?

21 Q. Financial profit, Madam Witness, the kind you have told
22 this Court about throughout your testimony. Financial profit.

23 A. But when you said when they would have committed crimes,
24 that's what is confusing me.

15:14:02 25 Q. You know very well that the RUF committed very serious
26 crimes against civilians in Sierra Leone, don't you,
27 Madam Witness?

28 A. When you are at the rear you wouldn't know what was
29 happening ahead of you.

1 Q. That's simply not true, is it, Madam Witness? You knew it,
2 you supported it, and now you're trying to deny that it happened.
3 Isn't that right?

4 A. I am not saying it did not happen. But when you were where
15:14:43 5 there is calm, you wouldn't know what was going on ahead of you.

6 Q. And you continued in these activities because you fully
7 supported the RUF and also because you fully supported
8 Charles Taylor. Isn't that right?

9 A. I was not supporting Charles Taylor.

15:15:05 10 MS HOLLIS: Madam President, I have no further questions.

11 PRESIDING JUDGE: Mr Anyah, do you have any re-examination?

12 MR ANYAH: Yes, I do, Madam President.

13 RE-EXAMINATION BY MR ANYAH:

14 Q. Good afternoon, Madam Kallon. I have a few questions for
15:15:30 15 you. These are aimed at clarifying the answers you gave to
16 questions that were asked by counsel opposite.

17 Yesterday in court in the afternoon, I believe, you were
18 asked some questions concerning your freedom of movement at the
19 time you were in Harbel. You were asked questions about how it
15:15:56 20 was that you could go from Harbel to Sokoto or Camp Naama, how
21 you moved from Harbel to places outside Liberia like the Ivory
22 Coast for purposes of trading, as well as to Guinea. Now, when
23 you made those trips when you were at Firestone, Harbel - and
24 let's take a trip to Camp Sokoto or Camp Naama, for example - and
15:16:34 25 you would go from Harbel to Camp Naama, did you enjoy any
26 privileged status at that time in the NPFL?

27 A. No.

28 Q. Let me ask it in another way. When you made those trips
29 from Harbel to Camp Naama, did you have any kind of special

1 status or special connection with the NPFL?

2 A. I did not have any special thing that they were doing for
3 me.

4 Q. Did you have any kind of special relationship with the NPFL
15:17:46 5 that would result in you receiving special treatment when you
6 went through an NPFL checkpoint?

7 A. They did not give me anything.

8 Q. What about the trips to the Ivory Coast and to Guinea? You
9 tell us you were a trader, a market woman in Harbel. You made
15:18:20 10 trips to those countries for business purposes. Questions were
11 asked of you yesterday regarding your ability to move freely from
12 Harbel to those places. Madam Kallon, when you made those trips
13 to Ivory Coast or Guinea, did you enjoy any special privilege or
14 status with the NPFL as you passed NPFL-controlled areas?

15:18:57 15 A. The vehicle that we board, I was not the only person in
16 those vehicles. We would be many in those vehicles. We, the
17 market women. We would go directly to the border. So they not
18 give me anything and I was not alone in the vehicle.

19 Q. You said they did not give you anything. My question was
15:19:18 20 whether you enjoyed some kind of status or special position.
21 When you made those trips, did you have any special status with
22 the NPFL as you crossed NPFL-controlled areas?

23 A. They were not giving me any privilege. When we get to the
24 checkpoints we would just talk and cajole them, then we'd pass
15:19:54 25 through. That was what we used to do.

26 Q. Thank you, Madam Kallon. The next series of questions has
27 to do with the manner in which you travelled during the war.
28 When you used to go to Camp Naama or you went to places like the
29 Ivory Coast and Guinea, were you using commercial vehicles, that

1 is, public transportation, that you had to pay before you were
2 allowed to travel?

3 A. Yes, we would pay the driver.

4 Q. Were commercial vehicles running normally in Liberia during
15:20:39 5 the period of the war?

6 A. I would have to explain that area. When some areas are
7 captured, they would make sure that some vehicles would be put in
8 place for transportation. Any other person can board that
9 vehicle. Those old vehicles, sometimes they don't have any
15:21:08 10 registration plates. That was how we travelled with them. All
11 of us who were traders used to travel with those vehicles going
12 up and down.

13 Q. When you travelled with others in those vehicles, other
14 civilians, and you got to a checkpoint, did everybody have to
15:21:27 15 disembark or get out of the vehicle at the checkpoint?

16 A. We did not disembark.

17 Q. Was it required at checkpoints that all occupants of a
18 commercial vehicle, a taxi, for example, would have to show
19 identification documents at every checkpoint?

15:22:11 20 A. There was nothing like ID cards.

21 Q. Can you speak Liberian English, Madam Kallon?

22 A. Yes.

23 Q. Can you tell us how many years in total you spent in
24 Liberia, given that you told us you went there first in 1968?

15:22:48 25 A. Well, just calculate it from 1968.

26 Q. Very well. Madam Kallon, at these checkpoints manned by
27 the NPFL, when a commercial vehicle got there did they attempt to
28 ascertain who inside the vehicle was a Liberian and who was a
29 Sierra Leonean?

1 A. No.

2 Q. Did they ask who in the vehicle was a Nigerian or a
3 Ghanaian?

4 A. Well, only at the time that they were capturing people, but
15:24:00 5 later they were not asking us. They were not asking people. We
6 just used to walk around.

7 Q. When you made those trips from Harbel to places like Camp
8 Naama, to the Ivory Coast, and Guinea for trading purposes, did
9 you travel as a civilian, Madam Kallon?

15:24:31 10 A. Yes.

11 Q. Yesterday you were asked questions about how you managed to
12 enter into the Ivory Coast. This is the time period when Gbarnga
13 had fallen to ULIMO. You went to Ganta, from Ganta you went up
14 to Sanniquellie - indeed, before you left Ganta the NPFL had
15:24:59 15 retaken Gbarnga - and you said you crossed over into the Ivory
16 Coast. Now, questions were asked of you regarding whether you
17 needed any documents to enter the Ivory Coast. Madam Kallon, the
18 border between Liberia and the Ivory Coast, is there only one
19 crossing point, or are there several crossing points along that
15:25:30 20 border?

21 A. The crossing points were many.

22 Q. Is it the case that at the various crossing points there
23 are always immigration or custom officials from either country?

24 A. During the normal times there were - the immigration
15:26:07 25 officials from the two countries used to be there, but during the
26 war if we wanted to cross we did not go to the main customs area.
27 There were so many other roads. So immigration issues did not
28 trouble people.

29 Q. Were there places along the borders of those two countries

1 during the war where someone could cross from one country to
2 another without meeting any government official, immigration,
3 custom or any other type of government official?

15:27:00 4 A. During the war, on the Liberian side, we did not use the
5 main roads, the main customs. There were other roads that we
6 used to go to Gbenda.

7 Q. I understand your response, Madam Kallon, but listen to my
8 question. We will come back to your response and issues specific
9 to you. The question had to do with whether there were parts of
15:27:24 10 the border that one could cross from one country to another
11 without encountering a custom or immigration officials. Did
12 they have such places along the border during the war?

13 A. Yes, a lot of them.

14 Q. And now let's focus on your own odyssey. The place along
15:27:56 15 which you crossed from Liberia into the Ivory Coast, were there
16 custom officers or immigration officers at the border post when
17 you crossed?

18 A. On the Liberian side?

19 Q. Yes. Let's start with the Liberian side. Were there any
15:28:20 20 immigration or customs officers on the Liberian side of the
21 border when you crossed to go ultimately to Danane?

22 A. I did not pass through the main road. I used to bypass.

23 Q. That bypass that you used, did anybody try to stop at the
24 border, any form of government official?

15:28:57 25 A. No.

26 Q. Were you required to show any kind of identification papers
27 when you crossed from Liberia to the Ivory Coast?

28 A. I hadn't any paper.

29 Q. Were you required to show any paper? You've said you had

1 no paper. I'm asking you if anyone along the border asked you
2 for paper, documentation?

3 A. No. When you cross, you just go straight to the refugee
4 area. They had a short place. As soon as you go across the
15:29:50 5 border, you would go there immediately and your name would be
6 taken down.

7 Q. And the refugee area that you speak of, is it on the
8 Guinean side or is it on the Liberian side?

9 A. On the Ivory Coast side.

15:30:10 10 Q. Thank you, Madam Kallon. I believe I misspoke, but you are
11 correct. Now, yesterday you were asked a question about
12 Augustine Gbao. This was the time period in the vicinity of
13 Makeni where there was infighting between Superman and Issa
14 Sesay. The question posed to you - and I should read it for the
15:30:33 15 benefit of accuracy. This is at yesterday's transcript at page
16 43242. Yes, question posed to you at line 3. Madam Kallon,
17 listen to the question:

18 "Q. And you moved from Makeni to Kailahun District,
19 correct?

15:31:10 20 A. Yes.

21 Q. And you were also able to get Augustine Gbao to agree
22 to lift his ambushes against Superman, yes?

23 A. Yes."

24 When you met Augustine Gbao, was it in Kailahun District or
15:31:33 25 was it in Magburaka?

26 A. It was in Magburaka.

27 Q. Is Magburaka in Kailahun District?

28 A. No. It is in the Tonkolili District.

29 Q. Thank you, Madam Kallon. You were asked questions

1 yesterday regarding whether or not at the various NPFL
2 checkpoints in Liberia there were SBUs, or small boys, and you
3 remember giving us certain responses yesterday. You said, yes,
4 you saw on occasions small boys at some checkpoints. You said
15:32:39 5 they held weapons. You never saw them firing the weapons. And
6 you said they would "just be sitting there to eat". This is at
7 page 43258 of yesterday's transcript.

8 Now, these small boys you saw at the checkpoints, when you
9 would see them, did you know their ages, Madam Kallon?

15:33:23 10 A. No. I wasn't their mother, so I don't know their ages.

11 Q. You remember telling us that you never saw them in a place
12 -well, you said you never saw a place where there were only
13 children; meaning that the children you saw were always in the
14 company of grown-ups. Do you know whether the children you saw
15:33:55 15 at the checkpoints were related to the NPFL soldiers you saw at
16 the checkpoint?

17 A. Some of them, they could be family members of the adults.
18 Some of them were not, because at times when there are children,
19 they will attract the other children and they will join them.

15:34:27 20 Q. Do you know whether any of these children were used for
21 fighting purposes by the NPFL?

22 A. Where I was, I did not see them go to any fighting. I only
23 saw them sitting at a place. Or if they saw a big man, a
24 dignitary person, they would walk - they would be behind that
15:34:54 25 person, but I didn't see them go into any fighting.

26 Q. Thank you, Madam Kallon. Yesterday a number of questions
27 were asked of you regarding whether or not houses owned by you
28 and your husband Daniel Kallon served as transit points for
29 fighters that were going to Camp Naama. I want to ask you a few

1 questions about that. Let's go to yesterday's transcript,
2 starting at page 43295. Madam Kallon, listen to this exchange
3 you had yesterday with learned counsel opposite. Line 1, you
4 were asked this question:

15:35:53 5 "Q. Now, we've talked about this before, but I want to ask
6 you again. It is correct, is it not, that people Foday
7 Sankoh was taking to Sokoto would sometimes spend the night
8 in a house owned by you and your husband? That is correct,
9 isn't it?

15:36:18 10 A. I said that's a lie. The house that we were in was not
11 that big.

12 Q. And I said a house owned by you and your husband
13 because you owned more than one house in Harbel. Isn't
14 that correct?

15:36:43 15 A. Yes. We built houses, but the houses had been rented
16 out.

17 Q. It's also true, is it not, that these people who would
18 spend the night in a house owned by you in Harbel as they
19 made their way to Sokoto, that these people would include
15:37:10 20 NPFL members who were being sent to Sokoto to train there?
21 Isn't that correct?

22 A. That - I'm not in line with that particular question.
23 I have told you that our house was small. It only had two
24 rooms. How could we accommodate many people?"

15:37:36 25 Let's pause there. A few questions for you, Madam Kallon.
26 How many houses did you and your husband have in Harbel, that is,
27 houses owned by you and Daniel GG Kallon, around the time when
28 you encountered Pa Morlai in Harbel?

29 A. I said, apart from the house that was given to us by

1 Firestone, we built two houses, but those houses were built in
2 business centres, they had shops, and so we rented them out to
3 people. People were doing business in those houses.

15:38:32 4 Q. In the house that Firestone gave you and your husband, did
5 you ever house any NPFL fighters overnight in that house?

6 A. No. The place was not conducive enough. It was tight.

7 Q. In that house given to you and your husband by Firestone,
8 did you ever house any persons who went to Camp Sokoto?

15:39:11 9 A. That particular house where we were, no. The place was a
10 small one.

11 Q. In the house that you stayed with Pa Kallon, your husband,
12 given to you by Firestone, did Foday Sankoh ever spend the night
13 in that house?

15:39:40 14 A. No. It was to the other place where my boy was, that's
15 where he lodged. He did not pass the night at our own place.

16 Q. Now, let's talk about this other place where your boy
17 lodged. Who owned that house, the house where Foday Sankoh would
18 pass the night?

19 A. Jackson. They were the ones who owned that house.

15:40:06 20 Q. How far from your house was that house where Foday Sankoh
21 would spend the night?

22 A. There is a street between us. Just across the street you
23 will see where they were sleeping.

15:40:35 24 Q. You referred to the house as being owned by your boy. This
25 person Jackson that you say owned the house, what was his
26 relationship to you?

27 A. They were at the house assisting me.

28 Q. Do you know whether Jackson owned that house or whether he
29 was renting it from someone?

1 A. It was a Firestone house. They were not renting it.

2 Q. How was it that Jackson came to occupy that house? Did he
3 work for Firestone?

4 A. Yes, when he started working for Firestone, it was when he
15:41:33 5 was given that house.

6 Q. Could you and your husband instruct Jackson on who he
7 should allow into his house?

8 A. Yes.

9 Q. At any point in time when Pa Morlai was recruiting men to
15:42:04 10 go to Camp Sokoto, did you and your husband ask Jackson to house
11 any NPFL men in that house, that is, in Jackson's house?

12 A. No.

13 Q. At any point in time when Pa Morlai used to frequent Harbel
14 to recruit fighters to go to Camp Naama, are you aware of NPFL
15:42:39 15 fighters being housed at Jackson's premises?

16 A. No, I don't know.

17 Q. Thank you, Madam Kallon. The two rental houses you say you
18 and your husband had, do you know whether any NPFL fighters spent
19 the night in those houses?

15:43:15 20 A. No, I don't know, because people were in the house. I
21 didn't go there. I don't know about that.

22 Q. The persons who were in the house, were they your tenants,
23 that is, those to whom you had rented the house?

24 A. Yes.

15:43:38 25 Q. Those to whom you had rented the house, those tenants of
26 yours, were they NPFL?

27 A. They were civilians. They used to sell.

28 Q. You mentioned somebody called Mr Robert as owning a house
29 not far from your house. I believe you said it was the house in

1 which John Kargbo stayed. Am I correct in saying that, Madam
2 Kallon?

3 A. Yes, Kargbo was there.

4 Q. Is that the house where Isaac Mingo stayed at?

15:44:34 5 A. Yes.

6 Q. How far from your house was that house?

7 A. It's not a far distance. It's - we were just neighbours.
8 Usually when we sweep, we sweep together in the same compound.

9 Q. Was that house owned by Mr Robert a house where NPFL
10 fighters would come, stay overnight, and then proceed on to Camp
11 Naama?

12 A. That one, Kargbo was there. I wasn't there. I was at my
13 house, so I don't know who used to pass the night there with him.

14 Q. Did you have any authority or control over who could spend
15:45:38 15 the night at John Kargbo's place in Harbel?

16 A. I did not even look at the place. In the morning I will go
17 to the market. I did not have any authority to say this person
18 should not sleep here or that person should not sleep here. I
19 did not tell him that, that he should not lodge people there. I
15:46:09 20 did not even go there. I did not even enter the place.

21 Q. You were asked a question yesterday regarding John Vincent.
22 Indeed, the transcripts pertaining to John Vincent's evidence to
23 the Court was read to you yesterday. Do you know somebody called
24 John Vincent, a Liberian?

15:46:36 25 A. No, I don't know him.

26 Q. Do you know anybody with the nickname Stone 1?

27 A. No.

28 Q. At any point in time while you were in Harbel did you and
29 Daniel G Kallon house John Vincent in your house?

1 A. No, I don't know him.

2 Q. Thank you, Madam Kallon. You were asked questions
3 yesterday about Camp Naama regarding, more specifically, the
4 presence of Liberians there. Madam Kallon, were you aware of any
15:47:32 5 Liberians training Foday Sankoh's men at Camp Naama?

6 A. I have told you that I don't know because I did not go
7 right into the place, so I don't know the people. I didn't know
8 the people who were there. I only knew few of them.

9 Q. Thank you, Madam Kallon. How about those persons referred
15:48:10 10 to as SBUs? Today you said Michael Stewart was the one person
11 you knew who fit that characterisation. Are you aware of any
12 other child besides Michael Stewart being trained at Camp Naama?

13 A. It was Michael Stewart that we're looking for, because that
14 one, he came to me and I saw him.

15:48:50 15 Q. Yes, besides Michael Stewart do you have knowledge of any
16 other child being trained at Camp Naama?

17 A. Well, I don't know because I did not look everywhere. It
18 was Michael Stewart that I saw.

19 Q. Today you were asked questions in relation to diamond
15:49:17 20 mining in Kono, and you said you had three boys who mined for you
21 in Kono. Did you force any of those three boys to mine for you?

22 A. No, I did not force them.

23 Q. And let's be specific. There was a clarifying response
24 given by you after the Presiding Judge asked the question about
15:49:52 25 the possible ages of these boys. You said two were married;
26 one had a girlfriend, not married, but, in your view, of age and
27 he had a girlfriend. Now, these three boys, were they civilians,
28 Madam Kallon?

29 A. Yes, they were civilians.

1 Q. Did you pay them anything for the work they did for you?

2 A. You wouldn't pay them. You would feed them. So when they
3 got diamonds, then they would tell you how much you should pay
4 them for the diamond. So when you give them what they had asked
15:50:37 5 for, then you in turn would go and sell it.

6 Q. Were these boys at any time free to tell you they no longer
7 wanted to work for you?

8 A. No, even now they are still working for me.

9 Q. But even now that they are still working for you, are they
15:51:08 10 free to leave your employ? Are they free to say, "We no longer
11 wish to work for you, Madam Kallon"?

12 A. Yes, they are free to say it. But, you know, the way I'm
13 treating them, they will not go.

14 Q. What way are you treating them?

15:51:34 15 A. I am treating them just like my own children. I feed them.
16 When they get sick, I'll take them to the hospital and I'll take
17 care of their wives. So it's difficult to see a boss like that
18 in the mining areas, so that's why they're still working for me.
19 They will not go.

15:51:53 20 Q. Today you were asked about looting in the place or area you
21 referred to as Koi lu. Did you participate in any looting in the
22 vicinity of Koi lu, Madam Kallon?

23 A. No.

24 Q. While you were in Koi lu, did Foday Sankoh ever assign any
15:52:20 25 bodyguards to you?

26 A. No.

27 Q. Indeed, at any time when you were inside Sierra Leone were
28 you assigned bodyguards by the RUF?

29 A. I had no bodyguards.

1 Q. Thank you, Madam Kallon. Can we go to page 33 - this is of
2 the LiveNote transcript of today - lines 18 through 25 using a
3 14-point font. Madam Kallon, I'll read you a question you were
4 asked earlier today. The question had to do with the markets
15:53:19 5 that were established by you in various locations in Sierra
6 Leone, including Koi lu, Di a, and other places you told us about
7 previously. And you'll remember you were being asked questions
8 about whether those who bought items at the market had to pay
9 some sort of tax over and above the cost of the items they
15:53:48 10 bought. You were asked this question:

11 "Q. When you went to the market and you bought something
12 you had to pay the equivalent of a tax on what you bought.
13 Isn't that correct?"

14 Madam President, the witness has her hands up.

15:54:11 15 PRESIDING JUDGE: Yes, Madam Witness?

16 THE WITNESS: I want to use the Ladies'.

17 PRESIDING JUDGE: Mr Anyah, please continue.

18 MR ANYAH: Thank you, Madam President:

19 Q. Madam Kallon, I was about to read you questions that were
15:57:02 20 asked of you this morning and responses that you gave. Let me do
21 so again. And the background of this is that it concerns the
22 markets that you established following the meeting that Foday
23 Sankoh held in the Koi lu area. Now, question to you was:

24 "Q. When you went to the market and you bought something
15:57:29 25 you had to pay the equivalent of a tax on what you bought.
26 Isn't that correct?

27 A. No, I don't know that. I do not understand that part.
28 I did not hear, nor see it."

29 This was in relation to whether or not civilians had to pay

1 a tax when they bought things at those markets. The next
2 question that was asked of you was this:

3 "Q. I suggest to you, Madam Witness, that you both heard
4 it and saw it and, in fact, helped to set that system up.

15:58:15 5 A. Yes."

6 Let me ask you a few questions. In those markets that you
7 set, you set them up, you referred to as Loumahs, after the
8 meeting with Foday Sankoh, did you ever see civilians who bought
9 something being asked to pay extra money, a tax on top of what
10 they had bought?

15:58:40

11 A. I never heard about that one and I did not see it happen,
12 so no.

13 Q. Did you help set up such a system, Madam Kallon, whereby
14 someone bought something and then addition to what they paid for
15 it they would have to pay a tax in addition?

15:59:06

16 A. No. I did not hear that and it did not happen in my
17 presence and I did not pay such a money, no.

18 Q. Thank you, Madam Kallon. At page 51 of today's LiveNote
19 transcript, lines 13 through 14, using a 14-point font, you were
20 asked some questions about the time when Amos Sawyer was interim
21 President of Liberia. The question was:

15:59:49

22 "Q. So you had gone to Sierra Leone, come back, gone to
23 Guinea and Ivory Coast many months after Amos Sawyer became
24 the President of the interim government, correct?

16:00:22

25 A. Yes. I used to go back and forth before Amos Sawyer
26 became interim government."

27 Where did you used to go back and forth to before Amos
28 Sawyer was interim President of Liberia?

29 A. At that time we used to go and buy in Guinea and Ivory

1 Coast. We used to go to those places.

2 Q. And after Amos Sawyer became interim President, did you
3 travel to those places for business as well?

4 A. Yes.

16:01:27 5 Q. Thank you, Madam Kallon. Yesterday you were asked
6 questions regarding whether or not you provided assistance to the
7 NPFL. I'm not speaking of the RUF now; I'm speaking of the NPFL.
8 And your response was to the effect that you were concerned with
9 the market side and I want to seek some clarifications.

16:02:02 10 When you were in Firestone, Harbel, Madam Kallon, did you
11 provide any food to the NPFL?

12 A. No.

13 Q. When you spoke yesterday of NPFL fighters eating at your
14 restaurant without paying, can you explain to us how it is that
16:02:38 15 some of them were not required to pay for the food they ate?

16 A. Yes, I explained that area. I said some of them would just
17 go, sit on the table and they ask for food. When you serve them,
18 after eating, they just walk out. So we just left them. Few of
19 them did that.

16:03:16 20 Q. Did you have the ability or authority to stop them, those
21 who ate without paying and left?

22 A. No. I couldn't do anything to them.

23 Q. Do you consider the fact that some of them ate without
24 paying at your restaurant to be the same thing as you providing
16:03:51 25 assistance to the NPFL?

26 A. No, that is no assistance because it was not a gift. There
27 was no way I could do, they had guns. If they ate and did not
28 pay me, there was nothing I could do. But I did not give them as
29 a gift, no.

1 Q. Thank you, Madam Kallon. Now, besides food, did you ever
2 provide any soap to the NPFL?

3 A. No.

4 Q. How about the other items you took to Camp Naama for Foday
16:04:50 5 Sankoh's fighters, did you give any of those items to the NPFL?

6 A. No.

7 Q. During the entire period of time when you were in Liberia,
8 Madam Kallon, did you ever talk one on one with Charles Taylor?

9 A. Never did that happen.

16:05:32 10 Q. Did you ever during the entire period of time you were in
11 Liberia visit Mr Taylor's private home, his residence?

12 A. No.

13 Q. During the entire period of time when you were in Liberia,
14 did you ever meet any of Mr Taylor's family members?

16:06:05 15 A. No. I don't even know them.

16 Q. During the time period of time when you were in Liberia,
17 did Mr Taylor ever do any personal favours for you, Isatu Kallon?

18 A. No.

19 Q. During the entire period of time when you were in Liberia,
16:06:37 20 did Mr Taylor ever do any personal favours for any of your family
21 members?

22 A. No.

23 Q. Thank you, Madam Kallon. You were asked questions this
24 morning regarding the sequence of events surrounding your trip
16:07:09 25 into Sierra Leone with Dr Sebo vis-a-vis or related to the trip
26 on which you took people like Philip Palmer, Agnes and
27 Deen-Jalloh, Kono Manie, Pa Alhaji Fofana, Pa Kamara and your
28 husband Pa Kallon. The issues were which trip happened first.

29 Now, Madam Kallon, as you sit there now, which trip do you

1 remember happening first? Was it the trip you took Dr Sebo into
2 Sierra Leone or was it the trip that you removed Philip Palmer
3 and the others from Sierra Leone? Which one happened first?

4 A. It was Dr Sebo whom I first went with.

16:08:25 5 Q. How about the trip when the hostages were handed over to
6 the Red Cross at the Guinean border, did you pull the hostages
7 out of Sierra Leone first before the trip you pulled Palmer and
8 the rest out of Sierra Leone?

9 A. Yes.

16:08:53 10 Q. When you say "yes", which one happened first, the hostages
11 leaving Sierra Leone, or Palmer, Kono Manie and Deen-Jalloh and
12 the rest leaving Sierra Leone?

13 A. We removed the people, the white people first before I came
14 to take Kono Manie and others.

16:09:23 15 Q. Thank you, Madam Kallon.

16 May the witness be - well, I'm making reference to MFI-2,
17 and this could be displayed if anyone wishes to see it, but we
18 considered it in court today, pages 14 and 15.

19 Madam Kallon, this morning in court counsel opposite read a
16:09:49 20 document to you, a document concerning the hostages that were
21 taken by the RUF and hostages that were freed by the RUF. This
22 morning in court you confirmed that the four places you knew
23 hostages to have been taken from were Kabala, Sierra Rutile,
24 Sieromco and Panguma. Now, let's consider this document. Shall I
16:10:25 25 we go to page 14, please. Page 14 towards the end, the
26 third-to-last paragraph. Yes. That paragraphs speaks of
27 hostages being taken following a rebel attack near Lago on the
28 road from Kenema to Panguma. So Panguma is mentioned there. I'm
29 sorry, I'm reading the wrong paragraph. The third to last

1 mentions Kabala, and that's the one that starts, "The abduction
2 of civilians received international publicity in November 1994".
3 So that paragraph says that these persons were abducted by the
4 RUF during the attack on Kabala. So Kabala is one of the places.

16:11:42 5 We go to the last paragraph. The last paragraph speaks of
6 a rebel attack near Lago on the road from Kenema to Panguma.
7 That paragraph mentions Panguma as being a place where a Swiss
8 national was reported missing from. Later in that same paragraph
9 there is reference to Sieromco and also Sierra Rutile as being
16:12:07 10 places from where hostages were abducted. So we have the four
11 places covered.

12 Let's go to page 15. The middle of the page, the paragraph
13 that reads, "However, despite these demands not being met." Now,
14 this is the paragraph that talks about the release of the
16:12:38 15 hostages and this paragraph reads:

16 "Despite these demands not being met, on 21 March 1995 the
17 RUF released the seven nuns captured in Kambia."

18 Let's set that aside for a minute and we go to the middle
19 of the paragraph. It reads:

16:13:01 20 "The ten other foreign nationals, those abducted from
21 Sieromco and Sierra Rutile sites in January 1995, were handed
22 over at the border with Guinea to representatives of the
23 International Committee of the Red Cross."

24 And it gives the date 20 April 1995 they were handed over,
16:13:32 25 together with six Sierra Leoneans, and it says "Who also been
26 abducted from the Sieromco and Sierra Rutile sites." Madam
27 Kallon, the question posed to you this morning related to when
28 the hostages that you took with Dr Sebo were released. What I
29 have just read to you speaks of the release of hostages from two

1 of the four sites you mentioned. Can I ask you this --

2 MS HOLLIS: Madam President, Defence counsel is misreading
3 this paragraph. Because if you look at it, it says:

4 "The other foreign nationals, Robert d' Cruz, Calum Murray,
16:14:30 5 Roger Graf, and those abducted from Sieromco and Sierra Rutile
6 sites".

7 And if you go back to page 14, it identifies Robert d' Cruz
8 and Calum Murray as having been taken during the attack on Kabala
9 and Roger Graf as having been taken during the attack near Lago
16:14:52 10 on the road from Kenema to Panguma. So in fact, it is referring
11 to all of those locations.

12 MR ANYAH: I take the point. It's an accurate observation.
13 Thank you:

14 Q. Madam Kallon, the hostages that you assisted Dr Sebo to
16:15:23 15 take out of Sierra Leone, you said there were five in number. Do
16 you know whether amongst those five there were hostages from each
17 of the four places you mentioned; that is Kabala, Sierra Rutile,
18 Panguma and Sieromco? Do you understand the question, Madam
19 Kallon?

16:16:02 20 A. I don't understand it.

21 Q. Do you know whether there was someone who was taken from
22 Kabala amongst the five persons that you helped Dr Sebo take out
23 of Sierra Leone?

24 A. Yes, one of them said it was Kabala but the others, when
16:16:35 25 they spoke, I did not understand.

26 Q. Do you know whether amongst the five was someone who was
27 taken from Panguma?

28 A. The man and the woman, they said they were captured in
29 Panguma. That's what they said.

1 Q. Did any of the five indicate that they were captured at
2 Sieromco?

3 A. Those ones, I did not keep their company. I kept company
4 with those two women. Even though they called those towns, but I
16:17:32 5 don't know those areas. They were talking about Panguma,
6 Sieromco, Rutile. So they were saying it, but I did not have
7 much with those people. There were only two men that I spoke
8 with.

9 Q. Very well. Thank you, Madam Kallon. One last area. This
16:17:58 10 morning you were asked a question about the time period when the
11 RUF were moving towards Freetown, and it was said to be before
12 the time Johnny Paul Koroma and the junta took over. Do you
13 remember being asked a question this morning about a time period
14 when the RUF was moving towards Freetown before the junta period?

16:18:39 15 A. Yes, they asked me.

16 Q. Were you under arrest at that particular time, that is,
17 before the junta period?

18 A. Explain a little.

19 Q. Yes. During the course of your evidence you told us of you
16:19:08 20 being released on the day the Abidjan Peace Accord was signed and
21 I read to you a judicially noticed fact, which said that the
22 Abidjan Peace Accord was signed on 13 November 1996. What I am
23 asking you is during the period of time when the RUF was moving
24 towards Freetown - this is before the junta period - were you
16:19:41 25 free or were you in detention at that time?

26 A. I was still in detention until the Abidjan Peace Accord was
27 signed. It was on that same day that I was released.

28 Q. Yes, we know that's the day you were released. But when
29 the RUF was said to be moving towards Freetown - that's the event

1 in question - were you free by that time, or were you still in
2 detention?

3 A. I was free.

16:20:31

4 MR ANYAH: Thank you, Madam Kallon. Madam President, I
5 have no further questions.

6 PRESIDING JUDGE: The judges have a few questions of the
7 witness.

16:20:55

8 JUDGE DOHERTY: Madam Witness, when you were supplying
9 cassava and potatoes to Camp Naama, how many people were living
10 at Camp Naama?

11 THE WITNESS: I did not count them, so I don't know.

12 JUDGE DOHERTY: We are told there are very many people.
13 Would you agree with that?

16:21:16

14 THE WITNESS: I did not know the number of people who were
15 there.

16 JUDGE DOHERTY: And how many potatoes and cassava did it
17 take to feed the people at Naama for one day?

18 THE WITNESS: I wasn't there when they were eating, so I
19 did not know how they proportioned it.

16:21:41

20 JUDGE DOHERTY: But you brought the potatoes and the
21 cassava. How much did you bring?

22 THE WITNESS: I have said here that some weeks I'll take 25
23 bags and some other weeks I'll go with 20 bags. That's what I
24 said.

16:22:01

25 JUDGE DOHERTY: How much in one bag?

26 THE WITNESS: Many.

27 JUDGE DOHERTY: And where did you get them?

28 THE WITNESS: In the market.

29 JUDGE DOHERTY: So did you have to pay for them?

1 THE WITNESS: Yes.

2 JUDGE DOHERTY: And why, if you made a profit on other
3 transactions, did you not charge for those many bags of potatoes
4 and cassava that you brought to Camp Naama?

16:22:39 5 THE WITNESS: At that time I had not started making
6 profits.

7 JUDGE DOHERTY: Those were the questions I had.

8 JUDGE LUSSICK: Madam Kallon - I'm referring to page 134,
9 if anybody wants to look at the transcript - Defence counsel
16:23:08 10 Mr Anyah not long ago asked you some questions about small boys
11 at checkpoints, and he reminded you that you had said that
12 although they held weapons, you never saw them firing the
13 weapons. Now, I wanted to ask you about an answer you gave to
14 one of the questions that Mr Anyah had asked you. The question
16:23:39 15 was this:

16 "Q. Do you know whether any of these children were used
17 for fighting purposes by the NPFL?

18 A. Where I was, I did not see them go to any fighting. I
19 only saw them sitting at a place or if they saw a big man,
16:24:05 20 a dignitary person, they would walk - they would be behind
21 that person, but I didn't see them go into any fighting."

22 Now, what I wanted to ask you is: When you saw these
23 children walking behind the big man or the big person, were they
24 protecting that person?

16:24:35 25 THE WITNESS: I just see them passing behind the people,
26 behind those big men.

27 JUDGE LUSSICK: Well, you said you saw them walking behind
28 the big men. I wanted to know why they were walking behind the
29 big men?

1 THE WITNESS: That one I don't know, because I just saw
2 them walking behind them.

3 JUDGE LUSSICK: Were they acting as their bodyguards?

4 THE WITNESS: When a big man usually walks around there
16:25:23 5 would be - the adults and the children would be around. All of
6 them would be behind that big man.

7 JUDGE LUSSICK: These children you saw at the checkpoints,
8 could you see why they were walking behind the big men and what
9 they were doing?

16:25:47 10 THE WITNESS: What I have said is what I know. When they
11 were walking, I was sitting there. At times when they would see
12 a dignitary, they would walk behind that person. That's what I
13 know.

14 JUDGE LUSSICK: They were walking behind the big person,
16:26:04 15 the dignitary, still carrying their weapons?

16 THE WITNESS: Yes. Few of them would have weapons. Some
17 of them did not have weapons, but they would still be behind
18 them.

19 PRESIDING JUDGE: Ms Kallon, these children again, were
16:26:29 20 they dressed in any kind of uniform, or how were they dressed?

21 THE WITNESS: They had T-shirts.

22 PRESIDING JUDGE: What kind of T-shirts?

23 THE WITNESS: T-shirts that they sell usually.

24 PRESIDING JUDGE: Okay. Thank you for your testimony.
16:27:01 25 Those are the only questions from the judges.

26 I believe there are exhibits that the parties would like to
27 tender before I dismiss the witness.

28 MR ANYAH: Yes, Madam President. We would ask respectfully
29 that MFI-1 be admitted into evidence. And in relation to the

1 Prosecution's MFIs, MFIs 2 and 3, I have no objection save for
2 saying that in the descriptions they should be limited to just
3 the portions considered in court by counsel opposite. And that
4 is, with respect to MFI-2, that would be the title on page 1; on
16:27:50 5 page 14, I believe paragraphs 5, 8 and 10 were covered; and on
6 page 15, the fifth paragraph was covered in court. Now, with
7 respect to MFI-3, it would be the fifth paragraph on page 1 and
8 all of page 2. Thank you.

9 PRESIDING JUDGE: Ms Hollis, do you have any objections to
16:28:26 10 MFI-1 being admitted?

11 MS HOLLIS: No objection, Madam President. And I would
12 request that MFI-2 and MFI-3 be admitted, and I have no concern
13 about your Honours only considering the portions that I dealt
14 with with the witness.

16:28:49 15 PRESIDING JUDGE: Very well. MFI-1, which is a news
16 article from a newspaper known as Focus on Sierra Leone, dated 30
17 November 1995, and the article is entitled "RUF officials
18 arrested in Conakry (Republic of Guinea)", the article consisting
19 of a cover page for the title and page 2 that has the article,
16:29:18 20 that is admitted as exhibit D-423.

21 [Exhibit D-423 admitted]

22 MFI-2, which is a document from a web page of
23 amnestyinternational.org, the document is entitled "Sierra Leone
24 human rights abuses in a war against civilians" and the article
16:29:46 25 consists of the title on the cover page and paragraphs 5, 8 and
26 10 on page 14, as well as paragraph 5 on page 15, that document
27 is admitted as exhibit P-552.

28 MFI-3, which is a Sierra Leone News Archives page dated 19
29 November 1998 and consisting of the title on page 1 and

1 paragraph 5 and half of the paragraph on page 2, that is admitted
2 as exhibit P-553.

3 [Exhibits P-552 and P-553 admitted]

16:30:36

4 Mrs Kallon, we've come to the end of your testimony and I
5 want to thank you for your patience and your testimony. And as
6 you go home, I wish you a safe journey home.

7 Thank you. I believe that tomorrow we will be recalling
8 DCT-190 for cross-examination, and we will adjourn the
9 proceedings now until tomorrow at 9 o'clock.

16:31:51

10 [Whereupon the hearing adjourned at 4.30 p.m.
11 to be reconvened on Friday, 25 June 2010 at
12 9.00 a.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

DCT-299	43304
CROSS-EXAMINATION BY MS HOLLIS	43304
RE-EXAMINATION BY MR ANYAH	43410

EXHIBITS:

Exhibit D-423 admitted	43434
Exhibits P-552 and P-553 admitted	43435