



Case No. SCSL-2003-01-T

THE PROSECUTOR OF  
THE SPECIAL COURT  
V.  
CHARLES GHANKAY TAYLOR

MONDAY, 9 AUGUST 2010  
9.00 A.M.  
TRIAL

TRIAL CHAMBER II

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**Before the Judges:**

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

**For Chambers:**

Mr Simon Meisenberg  
Ms Erica Bussey  
Ms Doreen Kiggundu  
Ms Sidney Thompson  
Mr Artur Appazov

**For the Registry:**

Mr Gregory Townsend  
Ms Rachel Irura  
Ms Zainab Fofanah

**For the Prosecution:**

Ms Brenda J Hollis  
Mr Joseph F Kamara  
Mr Nicholas Koumjian  
Mr Mohamed A Bangura  
Ms Kathryn Howarth  
Ms Maja Dimitrova  
Ms Ruth Mary Hackler  
Ms Ula Nathai-Lutchman  
Mr Nathan Quick

**For the accused Charles Ghankay Taylor:**

Mr Courtenay Griffiths QC  
Mr Morris Anyah  
Ms Silas Chekera  
Ms Logan Hambrick  
Ms Fatiah Balfas  
Mr Simon Chapman  
Ms Elizabeth Espinosa  
Ms Kathryn Hovington  
Mr Tor Krever  
Ms Salla Moilanen

**For the witness Carole White:**

Mr Daniel Bright

1 Monday, 9 August 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.05 a.m.]

08:54:29 5 PRESIDING JUDGE: Good morning. We will take appearances  
6 first, please.

7 MR KOUMJIAN: Good morning, Madam President. Good morning  
8 your Honours. Good morning, opposing counsel opposite. For the  
9 Prosecution this morning, Brenda J Hollis, Joseph Kamara, Mohamed  
09:05:22 10 A Bangura, Kathryn Howarth, Ruth Mary Hackler, Ula  
11 Nathai-Lutchman, Nathan Quick, Maja Dimitrova our case manager,  
12 and our intern Imogen Parmar. And I forgot myself, Nicholas  
13 Koumjian.

14 MR GRIFFITHS: Good morning, Madam President and counsel  
09:05:51 15 opposite. For the Defence today, myself Courtenay Griffiths.  
16 With me, Mr Morris Anyah, Mr Silas Chekera, Ms Logan Hambrick,  
17 Ms Kathryn Howarth - sorry, Hovington, Mr Tor Krever,  
18 Ms Elisabeth Espinosa, Ms Fatiah Balfas, Ms Salla Moilanen and  
19 Mr Simon Chapman.

09:06:36 20 I am sorry, Madam President, that I seem somewhat  
21 distracted. The reason for my distraction is this: About seven  
22 minutes ago I was told, contrary to a witness order filed by the  
23 Prosecution, that the first witness to be called this morning is  
24 Mia Farrow. The reason for my concern is this: We received last  
09:07:07 25 night, gone 8 o'clock, proofing notes from Carole White who was  
26 supposed to be the next witness. So if there was a concern and  
27 difficulty in having her first thing this morning, we should have  
28 been notified last night, rather than seven minutes ago.

29 Now, by CMS 1013, Public Prosecution witness list for 9

1 August of this year, we were told that the first witness to be  
2 called this morning was Carole White. Where is she? She is  
3 definitely in The Hague and why we know she is definitely in The  
4 Hague is this: We received an email from the Prosecution, timed  
09:07:59 5 at 20:15 last night, containing proofing notes from that witness.  
6 So she is here.

7 We received that at 20:39. So where is she? Why is it  
8 that we are now being told that Mia Farrow is to be the first  
9 witness called when we have prepared and planned our strategy  
09:08:22 10 based on their notification that the first witness to be called  
11 will be Carole White.

12 Now, my concern stems from this: This is a Prosecution who  
13 have been quick to criticise the Defence when we have erred in  
14 the most minor way, and now here they are playing, we say, fast  
09:08:47 15 and loose with this Court. It should not be allowed.

16 The witness is here, she should be called, and I am  
17 seriously angry about this because they are playing fast and  
18 loose with this Court and it shouldn't be allowed to happen.

19 Where is the witness? Unless, of course, some  
09:09:09 20 accommodation is being made because Ms White, as I have been  
21 informed, has an appointment later on today. This Court is not  
22 here for the convenience of witnesses. This Court is not here  
23 for a Prosecution to be pandering to the niceties of witnesses in  
24 this way. This is frankly totally out of order. And, in our  
09:09:39 25 submission, you judges must do something about it and tell them  
26 to call the witnesses in the order they filed so many days ago.

27 PRESIDING JUDGE: Mr Koumjian, do you have conduct of the  
28 next witness? Shall we hear from the Prosecution?

29 MR KOUMJIAN: Yes, your Honour, I do.

1 Your Honour, the Prosecution informed the Court and counsel  
2 that we intended - long ago that we intended to call both  
3 witnesses on 9 August. I take responsibility if the order that  
4 they were listed - and I understand they were listed in the order  
09:10:23 5 White, Farrow - was inverted. I take responsibility for that.  
6 But we indicated from the very beginning that these were  
7 witnesses that were both very short, that we would complete our  
8 direct examination in no more than two hours for each of them;  
9 Ms Farrow actually substantially less time will be required.

09:10:44 10 So WVS has arranged to have Ms Farrow here first. They  
11 cannot be transported together.

12 Ms White, the WVS informed us, would be here at 10 o'clock.

13 The Defence has known that we intended to call both  
14 witnesses today. They are not prejudiced in any way.

09:11:07 15 PRESIDING JUDGE: Mr Koumjian, if I may interrupt you, why  
16 did you invert or reverse the order of appearance?

17 MR KOUMJIAN: I think there was simply a miscommunication  
18 between lawyers and case manager. There was never an intention  
19 to call White before Farrow; it was Farrow before White.

09:11:23 20 PRESIDING JUDGE: Is there any truth in the allegation that  
21 Ms White has another engagement later on?

22 MR KOUMJIAN: The reason she is not here is because we  
23 asked WVS to bring Ms Farrow here first. WVS informed us - in  
24 fact, we asked that Ms White be here at the same time, and that  
09:11:41 25 was not possible according to WVS, but she will be here, they  
26 informed us, by 10 o'clock.

27 Your Honour, as regards to the proofing notes, the  
28 Prosecution has a responsibility under the rules, which we take  
29 seriously, to inform the Defence of any additional information in

1 a proofing. Both of these witnesses were proofed yesterday, late  
2 afternoon. Proofing notes were prepared according to our  
3 obligations and sent to the Defence very promptly the same day,  
4 within hours of the proofing.

09:12:19 5 So the Prosecution has done everything it can to comply  
6 with its obligation to keep the Defence informed of the  
7 anticipated testimony.

8 Both witnesses were scheduled for today, and we don't  
9 believe there is any prejudice from inverting the order of the  
09:12:36 10 two witnesses. We are prepared to proceed with Ms Farrow, but  
11 obviously that's up to your Honours to decide.

12 PRESIDING JUDGE: I will consult.

13 [Trial Chamber conferred]

14 PRESIDING JUDGE: Mr Griffiths, we are of the view that, in  
09:14:37 15 view of the explanation given by the Prosecution - obviously a  
16 core order of witnesses should be respected. The whole purpose  
17 of a core order is to put the other party on notice of how you  
18 are going to call your evidence, and in this case it has not been  
19 respected.

09:14:58 20 However, the remedy, in our view, is not to stand over the  
21 testimony of Ms Farrow completely. The remedy in this case, if  
22 you insist that the Defence is prejudiced, is for her  
23 cross-examination to be stood over until a later time, perhaps  
24 until after Ms Carol White has testified. This is normally the  
09:15:21 25 remedy that we give in the event that a witness has been called  
26 earlier than expected, and I hope that this will solve the  
27 problem between the parties.

28 So Ms Farrow will be called in now.

29 MR ANYAH: Good morning, Madam President. Good morning,

1 your Honours. Good morning, counsel opposite. I only rise to  
2 indicate that I have carriage of Ms Mia Farrow for the Defence,  
3 and I am prepared to proceed. Thank you.

09:16:13

4 PRESIDING JUDGE: Mr Koumjian, I presume you have carriage  
5 of the witness.

6 MR KOUMJIAN: That is correct, Madam President.

7 PRESIDING JUDGE: Normally you do disclose what kind of  
8 oath they will take and the language of the communication.

09:16:29

9 MR KOUMJIAN: The witness will testify in English, and she  
10 will take the oath on the Bible.

11 WITNESS: MIA FARROW [Sworn]

12 EXAMINATION-IN-CHIEF BY MR KOUMJIAN:

13 Q. Good morning, Ms Farrow.

14 A. Good morning.

09:18:07

15 Q. Would you please state your full name and spell your name  
16 for the Court?

17 A. Mia Farrow. Mia, M-I-A; Farrow, F-A-R-R-O-W.

18 Q. Can you please state your date of birth?

19 A. February 9, 1945.

09:18:25

20 Q. Thank you. Ms Farrow, are you aware of something called  
21 the Blue Train?

22 A. Yes.

23 Q. Can you tell us what your association, if any, was with the  
24 Blue Train?

09:18:37

25 PRESIDING JUDGE: Don't you think she should tell us first  
26 what the Blue Train is?

27 MR KOUMJIAN: In whatever order.

28 Q. Madam, can you first then explain, what you understand,  
29 what is the Blue Train?

1 A. As I understand it, there was a renovation of said train  
2 and a relaunching of this Blue Train in South Africa, from  
3 Pretoria to Cape Town. It had been a legendary train circuit,  
4 and it was renovated and relaunched.

09:19:07 5 Q. And, madam, what connection, if any, did you have to the  
6 relaunch of the Blue Train?

7 A. An event was planned around that relaunching to which I was  
8 invited by the offices of Nelson Mandela in 1997.

9 Q. Did you travel to South Africa?

09:19:30 10 A. I travelled to South Africa at his invitation, and it was  
11 for his - in support of his children's charities.

12 Q. You said in support of the children's charity. Was there  
13 any connection between the Blue Train event and the charity?

14 A. Yes. I think that event and the festivities surrounding  
09:19:55 15 that event, all the proceeds were to go to Nelson Mandela's  
16 children's charities. Indeed, the Blue Train stopped all along  
17 the way to visit children that his charities were supporting.

18 Q. Thank you. Now, when you travelled to South Africa, did  
19 anyone go with you?

09:20:14 20 A. I brought my - three of my children.

21 Q. Can you state each of their names, please?

22 A. Yes. The eldest is Matthew Previn. He was born in 1970.  
23 Malone Farrow, born in 1985. And Ronan Farrow, born in 1987.

24 Q. Now, when you arrived --

09:20:39 25 PRESIDING JUDGE: Mr Koumjian, we will need some spelling  
26 of names, please.

27 THE WITNESS: Matthew Previn, P-R-E-V-I-N.

28 MR KOUMJIAN:

29 Q. And Matthew, madam, Ms Farrow, how do you spell that?

1 A. M-A-T-T-H-E-W.

2 Q. Malone Farrow?

3 A. M-A-L-O-N-E. Farrow, the same as mine, F-A-R-R-O-W.

4 Q. And Ronan?

09:21:02 5 A. And Ronan, R-O-N-A-N.

6 Q. When you arrived in South Africa, was there any programme  
7 before the launch of the Blue Train?

8 A. Yes. There was an evening - a dinner given at the  
9 residence of President Nelson Mandela.

09:21:20 10 Q. In which city is the residence?

11 A. It was in Pretoria.

12 Q. Do you recall, who did you go to that - did you go to that  
13 dinner?

14 A. I did.

09:21:34 15 Q. Did you go with anyone?

16 A. I attended with my three children.

17 Q. Do you recall approximately when you arrived?

18 A. The time of day? No. It was early evening, late  
19 afternoon.

09:21:49 20 Q. When you arrived, who did you see present?

21 A. Well, I was met by Mrs Graca Machel, and there were - I was  
22 very punctual; I was among the first to arrive. But there were  
23 people already there, men, and they moved toward the children,  
24 and I remember this because Mrs Machel said, in effect, "No, no.  
09:22:21 25 You don't want to be photographed with this man. This is the  
26 President of Liberia. He's not supposed to be here," or, "He  
27 should have left by now," something to that effect. And she  
28 moved the children and me to another area.

29 Q. Who is Graca Machel?



1 A. Mrs Machel was then the partner of President Mandela. They  
2 had not yet married.

3 PRESIDING JUDGE: Can we have the spelling of that name,  
4 please?

09:22:49 5 MR KOUMJIAN: For the record, G-R-A-C-A, and I believe the  
6 C has a cedilla, and the last name M-A-C-H-E-L.

7 Q. Now, the person that was identified to you as the President  
8 of Liberia, do you now - do you know the name of that person?

9 A. Charles Taylor.

09:23:21 10 Q. Had you ever met Charles Taylor or seen him before?

11 A. No.

12 Q. Since that night, have you ever met or seen Charles Taylor  
13 in person?

14 A. No. No, I have not.

09:23:35 15 Q. Can you tell us any of the other guests that you recall  
16 being present at the dinner?

17 A. Yes. The group that had assembled for the Blue Train  
18 festivities arrived at that dinner: Naomi Campbell, Quincy Jones  
19 and his partner, Imran Khan, the soccer player, and his then  
09:24:08 20 wife, Jemima Khan. There was an actor, I think, Tony Leung,  
21 that's what I remember.

22 Q. And I think for only the last there is no spelling on the  
23 record and that's L-E-U-N-G. Ms Farrow, do you recall the  
24 seating arrangements, anything about the seating arrangements at  
09:24:41 25 the dinner?

26 A. I remember that I was seated with my children and I was  
27 seated close to Imran Khan and Jemima Khan. I don't remember  
28 further than that.

29 Q. Where did you and your family spend the evenings, where did

1 you sleep that evening?

2 A. We slept at the government or presidential guesthouse.

3 Q. Do you know if any of the other guests were also sleeping  
4 at the guesthouse?

09:25:21 5 A. I think we all were.

6 Q. So would that include all of those that you have named?

7 A. I believe so, yes, all those that I named.

8 Q. How about your children, did they stay at the guesthouse?

9 A. Yes, my children stayed there with me.

09:25:41 10 PRESIDING JUDGE: And was this a different building than  
11 where you had the dinner?

12 THE WITNESS: Yes, it was.

13 MR KOUMJIAN:

14 Q. Was it on the same grounds or was it a different location,  
09:25:52 15 if you recall?

16 A. I can't recall.

17 Q. Now, after that evening, the next morning, do you have any  
18 recollection of what occurred the next morning?

19 A. Yes. I remember that the children and I were having  
09:26:11 20 breakfast. There was a long table and others at the table, and I  
21 think Quincy Jones and - what I remember is Naomi Campbell joined  
22 us at the table but, before she even sat down, she recounted an  
23 event of that evening. And she said that in the night she had  
24 been awakened, some men were knocking at the door and they had  
09:26:53 25 been sent by Charles Taylor and they were giving her - they had  
26 given her a huge diamond. And she said that she intended to give  
27 the diamond to Nelson Mandela's children's charities.

28 Q. When Ms Campbell arrived - first of all, where is the area  
29 that you were eating breakfast?

1 A. It was a dining room.

2 Q. Was it in the same guesthouse or was it a different  
3 location?

4 A. It was, it was in the same guesthouse.

09:27:27 5 Q. Do you recall if the guesthouse was a single level  
6 structure or multi-level - multi-storey?

7 A. I seem to remember that it was at least two storeys but I -  
8 I'm not sure.

9 Q. Were your children with you at the breakfast?

09:27:48 10 A. They were.

11 Q. Did Ms Campbell ever show you the gift that she received,  
12 to your recollection?

13 A. No, she did not.

14 Q. Was - did you have any further contact with Naomi Campbell,  
09:28:19 15 first on this trip?

16 A. Yes. We then went on the Blue Train overnight, not all the  
17 guests did, and Naomi and I had the great privilege of having a  
18 meal with Nelson Mandela and Graca Machel, just the four of us  
19 and then - another trip to South Africa, Naomi initiated, also  
09:28:49 20 for Nelson Mandela's children's charities, and she invited me  
21 also to come on that trip as well, so we had a separate event  
22 going to South Africa together.

23 Q. So going to that second trip - well, the next trip to South  
24 Africa that you mentioned, can you explain again how was it that  
09:29:10 25 you were invited on a second trip to South Africa?

26 A. Well, we had become friendly and she was eager - we were  
27 both eager to support President Mandela's children's charities in  
28 any ways we could and she had the idea of bringing some famous  
29 supermodels to Cape Town to have a fashion show and raise money

1 for the charity that way. Precisely how I fit into that scheme I  
2 don't know, since I am far from a fashion model, but she had  
3 invited me on the trip and, you know, there were - it was Kate  
4 Moss and Christy Turlington, very famous fashion models. We all  
09:30:00 5 left together from New York City. And I believe they raised a  
6 good sum for the charity.

7 Q. Now, did you have any other contact with Ms - well, perhaps  
8 it might be necessary for the record to spell Turlington, can you  
9 do that, madam?

09:30:19 10 A. I'm not sure that I can. I can probably guess. Whether  
11 there are two Rs or not, I don't know.

12 MR KOUMJIAN: I will do that in a moment, your Honours.

13 Q. Did you have any contact with Naomi Campbell after that  
14 charitable event?

09:30:38 15 A. Yes, I did. She asked me to give an interview for one of  
16 the big magazines and I can't remember which, they were doing an  
17 article about her and she asked if I could be one of - one of the  
18 friends that knew her that could speak about her. And, indeed, I  
19 could. She was absolutely wonderful to me, and my children adore  
09:31:05 20 her. She even lent my little girl, who was then 12, her dress.

21 My daughter didn't like the dress I brought for her and  
22 Ms Campbell gave her one of her dresses to wear for that evening.  
23 So they - they just are crazy about her. And she was just - she  
24 was very maternal not only with my kids but the models that she  
09:31:27 25 shepherded to South Africa, some of them being quite young. She  
26 was absolutely great.

27 Q. You said she lent a dress - Ms Campbell lent a dress to  
28 your daughter, which daughter was that?

29 A. My daughter Malone.

1 Q. And when was that?

2 A. That was on the fashion show trip, the second trip.

3 MR KOUMJIAN: Your Honour, for the record, Christy  
4 Turlington, C-H-R-I-S-T-Y T-U-R-L-I-N-G-T-O-N.

09:32:05 5 Q. Ms Campbell, you've told us - excuse me, Ms Farrow, you  
6 have told us what Ms Campbell told you at breakfast the morning  
7 of the Blue Train trip. I would like to show you a video clip  
8 now where Ms Campbell is asked about that evening.

9 [Video clip played to the Court]

09:33:23 10 MR KOUMJIAN: Your Honour, I believe a transcript, I should  
11 have mentioned this previously, was distributed this morning of  
12 this short clip.

13 PRESIDING JUDGE: Did the witness - madam, did you see the  
14 video clip?

09:33:52 15 THE WITNESS: I only saw the latter part of it. It wasn't  
16 on my screen.

17 MR KOUMJIAN: I see. Perhaps we should play it again and  
18 the transcript should be made available to the witness also.  
19 Does she have a transcript?

09:34:05 20 PRESIDING JUDGE: Mr Koumjian, under what tab is that  
21 transcript to be found?

22 MR KOUMJIAN: It is not under a tab. It was distributed  
23 this morning, separately. It's a single page, I think.

24 PRESIDING JUDGE: Is it possible to display the transcript  
09:34:56 25 and play the tape?

26 MR KOUMJIAN: I don't believe that would be possible for  
27 the public. One or the other would be on the screen.

28 MS IRURA: Your Honour, it is only possible to have either  
29 the transcript or the clip, we cannot have both at the same time.

1           PRESIDING JUDGE: In that case, please hand the transcript  
2 directly to the witness for her to see and then play the video  
3 clip on the overhead.

4                               [Video clip played to the Court]

09:36:25 5           MR KOUMJIAN:

6           Q.    Ms Farrow, looking at the transcript and the video you just  
7 saw, you saw - you heard a reporter ask Ms - first of all, did  
8 you recognise Naomi Campbell in that video clip?

9           A.    I did.

09:36:42 10          Q.    The reporter asked Ms Campbell, "You received a diamond  
11 from Charles?" And Ms Campbell said, "I didn't receive a  
12 diamond." Is that statement from Ms Campbell consistent with  
13 what she told you at breakfast the morning after the dinner - the  
14 morning of the launch of the Blue Train?

09:37:04 15          A.    No.

16           MR KOUMJIAN: Your Honours, I would like to display the  
17 transcript from 5 August - I have no further questions on the  
18 videotape, unless anybody else does - a transcript from 5 August  
19 of this year, page 45471. Before I do that, perhaps I should ask  
09:37:31 20 that the video clip be marked for identification, and the  
21 transcript - video clip A, transcript B.

22           PRESIDING JUDGE: Well, the video clip of ABC News  
23 depicting Ms Campbell during an interview will be marked MFI-11A  
24 and the accompanying transcript of the interview MFI-11B.

09:38:22 25           MR KOUMJIAN: Is the transcript up? Thank you.

26           Q.    I want to read, beginning at line 10.

27           Ms Farrow, I am reading to you from the testimony of Naomi  
28 Campbell here in this Court last week. She was asked about the  
29 events that - the dinner that you spoke about and the breakfast

1 that you spoke about. She was asked on line 10:

2 "Q. What did you think these stones were?

3 A. Well, I was set - when I told to Ms White and Ms Farrow  
4 at the breakfast table, one of them, I'm not sure which one  
09:39:08 5 of them, said, 'Well, they're obviously diamonds.' "

6 Ms Farrow, did that occur at the breakfast?

7 A. No. I didn't see the diamonds or diamond.

8 Q. Ms Campbell went on and was asked on the next line:

9 "Q. So they recognised them as diamonds?

09:39:35 10 A. I don't remember showing them the diamonds. I don't  
11 remember opening the pouch and showing either one of them. "

12 Q. So tell us again, you went to breakfast, you were  
13 breakfasting with Mia Farrow and Carole White?

14 A. Yes. "

09:39:54 15 First of all, Ms Farrow, do you know - do you recall Carole  
16 White?

17 A. With apologies to Carole White, I don't remember her.

18 Q. Do you have any business relationship with Carol White?

19 A. No.

09:40:11 20 Q. Do you have any personal relationship with Carole White?

21 A. No.

22 Q. Do you recall now, in 2010, any persons that were  
23 accompanying Ms Campbell on that trip to South Africa in 1997?

24 A. No.

09:40:33 25 PRESIDING JUDGE: Mr Koumjian, clarification from the  
26 witness.

27 Ms Farrow, at this breakfast table, the suggestion that  
28 Ms Campbell had received - or what Ms Campbell had received were  
29 or was in fact a diamond or diamonds, where did that suggestion

1 come from?

2 THE WITNESS: From Ms Campbell. Ms Campbell entered the  
3 room, my children and I were already eating breakfast, and, as I  
4 recall it, she was quite excited and said, in effect, "Oh my God,  
09:41:13 5 in the middle of the night last night - or last night I was  
6 awakened by knocking at the door and it was men sent by Charles  
7 Taylor and he sent me" - as I recall - "a huge diamond."

8 PRESIDING JUDGE: And the suggestion as to where this gift  
9 had come from, whose suggestion was that?

09:41:35 10 THE WITNESS: Only hers. I didn't know anything about it.

11 MR KOUMJIAN:

12 Q. What did you know at that time about Charles Taylor?

13 A. I didn't know anything other than Mrs Machel's reaction  
14 when we arrived at the dinner, that she said, "This is" - you  
09:41:58 15 know - "not someone we want to be here." So I gathered he was a  
16 person of disputable character, but I really didn't know in 1997  
17 anything about him.

18 Q. Did you have any knowledge then, to the best of your  
19 recollection, about the war in Sierra Leone?

09:42:20 20 A. Only the vaguest - no, not really, that was not my focus  
21 and I didn't - shamefully, I didn't know anything. I didn't know  
22 - I didn't know any connection with diamonds or anything like  
23 that with him at the time.

24 Q. Well, let me continue to read, because it goes on, and

09:42:51 25 Ms Campbell is asked:

26 "Q. And what did you tell them exactly that happened?

27 A. I told them exactly what had happened in the middle of  
28 the night. My door was knocked at and I opened the door  
29 and I was given a pouch and I told them the whole - what I



1 just told you, and I'm not sure which one of the two  
2 said, 'Well, that's obviously Charles Taylor.'"  
3 Who said the diamonds came from Charles Taylor?

4 A. Naomi Campbell.

09:43:30 5 Q. And then if we could go to page 45500, please, just the  
6 last three lines.

7 PRESIDING JUDGE: Please pause. Yes, Mr Anyah?

8 MR ANYAH: Yes, Madam President, I just wish to make it  
9 known on the record that the procedure being adopted by the  
09:43:44 10 Prosecution essentially amounts to the Prosecution using one  
11 Prosecution witness to impeach another. That is what this  
12 practice counsel is undertaking at the moment amounts to. So I  
13 register an objection on the record. They cannot use one witness  
14 to impeach another Prosecution witness.

09:44:04 15 PRESIDING JUDGE: Mr Koumjian?

16 MR KOUMJIAN: Your Honour, I would like to address that. I  
17 would like to address it in depth, and perhaps if counsel prefers  
18 it may be advisable to have the witness step out of the courtroom  
19 while I do that.

09:45:09 20 PRESIDING JUDGE: Mr Koumjian, we do not think that it will  
21 be necessary for you to respond, or indeed for the witness to go  
22 out. The view of the Bench unanimously is that where a party  
23 calls a witness, a witness who either - who, in their testimony,  
24 either says something that is not altogether accurate or is  
09:45:38 25 different from what another witness says, that party is entitled  
26 to call other witnesses to speak to the same facts and give their  
27 version of the story. There is nothing in the law to prohibit  
28 that. Now any other arguments later are for submissions. So the  
29 objection is overruled. Please continue.

1 MR KOUMJIAN: Thank you. If the witness could be shown  
2 page 45500 of the transcript of 5 August.

3 Q. Ms Farrow, going to the last three lines of that page, just  
4 to put this in context, Defence counsel was reading part of a  
09:46:29 5 declaration from you and quoted your declaration:

6 "Ms Campbell told us that she would be donating the diamond  
7 to Mandela's children's charities. As far as I recall, I did not  
8 see the diamond."

9 Going to the next page, Ms Campbell was asked:

09:46:53 10 "Q. Did you have such a discussion at the breakfast table  
11 with Mia Farrow?

12 A. No, not about what I was - my intentions was to find  
13 Jeremy and I hadn't told her that."

14 She was then asked:

09:47:08 15 "Q. Now, just to be quite clear about this, are you saying  
16 you never had a discussion with Mia Farrow about what you  
17 were going to do with those pebbles?

18 A. No, not until I found Jeremy. I did not discuss,  
19 because I hadn't found him at that point so I didn't know,  
09:47:28 20 you know."

21 Ms Farrow, how did you learn that Naomi Campbell intended  
22 to give the diamonds to a charity?

23 A. In that same moment that she arrived, in that same couple  
24 of sentences, she said, "Of course I don't intend to keep the  
09:47:50 25 diamond." I don't think she said "diamonds", but my recollection  
26 is "diamond". She said, "Of course I'll give it to Madiba's  
27 children's charity." It was the same flow, the same moment. I  
28 wouldn't call it a conversation; it was just a comment.

29 Q. Thank you. Then I have just one more short transcript

1 excerpt and that's 45514. Before I read that, you said Madi ba.  
2 Who is Madi ba?

3 A. Nelson Mandela, as a beloved term in South Africa for  
4 President Mandela.

09:48:50 5 MR KOUMJIAN: That is spelled, your Honours, M-A-D-I-B-A.

6 Q. Starting at line 21 of page 45514, one of the Justices,  
7 Justice Lussick, asked Ms Campbell:

8 "JUDGE LUSSICK: Now on the question of the gift of  
9 diamonds, you've told us that you just assumed that they  
10 came from Charles Taylor.

09:49:19

11 THE WITNESS: Yes, because he didn't actually give it to me  
12 himself, like, you know, so.

13 JUDGE LUSSICK: No, I'm not actually asking that." He  
14 clarified. "I'm just prefacing my question by saying that  
15 you have told us that you only assumed that they came from  
16 Charles Taylor.

09:49:39

17 THE WITNESS: Yes.

18 JUDGE LUSSICK: But have you considered that they may have  
19 come from somebody else present at the dinner?

09:49:53

20 THE WITNESS: When we discussed it at breakfast, I think it  
21 was Mia Farrow that said that there's no one else at the  
22 table that would give such a gift, so the assumption was  
23 made, and I said, 'Okay, I guess it was.'"

24 Ms Farrow, did you tell Naomi Campbell that the diamond or  
25 diamonds came from Charles Taylor?

09:50:18

26 A. Absolutely not.

27 Q. Who did Naomi Campbell say the diamond came from?

28 A. Naomi Campbell said they came from Charles Taylor.

29 MR KOUMJIAN: Thank you. I have no further questions of

1 the witness.

2 PRESIDING JUDGE: Mr Anyah, cross-examination?

3 MR ANYAH: Yes, thank you, Madam President.

4 CROSS-EXAMINATION BY MR ANYAH:

09:50:43 5 Q. Good morning, Ms Farrow.

6 A. Good morning.

7 Q. My name is Morris Anyah. I am one of Mr Taylor's lawyers.  
8 I have a few questions for you.

9 Is there anything you have told the Court this morning  
09:50:56 10 during your testimony that you would like to take back, you would  
11 like to retract?

12 A. No.

13 Q. Is there anything you have told the Court that in your view  
14 might be the result of a faulty memory?

09:51:10 15 A. I hope not. I think I've made it clear where I'm not sure;  
16 how many floors the guesthouse had, who was at the table. These  
17 things I'm not so sure about.

18 Q. Have you, while testifying to the Court, exaggerated in any  
19 way - even ever so slightly - any of the events from 1997 in  
09:51:40 20 South Africa?

21 A. No.

22 Q. Do you stand by everything you have told the Court?

23 A. I stand by everything I've told the Court.

24 Q. You have not deceived the Court in any way, in your view?

09:51:55 25 A. I have not deceived the Court in any way.

26 Q. Shall we consider the events from September 1997. You  
27 notice I said the word "September." You do not recall the month  
28 in 1997 when these events took place, do you?

29 A. No, I don't.

1 Q. You were not present with Ms Campbell in her room when  
2 those men showed up, were you?

3 A. No, I wasn't.

4 MR ANYAH: Madam President, I am trying to get the lectern  
09:52:30 5 adjusted so that I can be more comfortable. Please permit me to  
6 do that. Thank you.

7 Q. Now, you were not in Ms Campbell's room. You do not know  
8 the nationalities of the men who knocked at her door, do you?

9 A. No.

09:52:49 10 Q. You do not know their identities, their names, for example,  
11 do you?

12 A. No.

13 Q. The item you referred to as a diamond, others have referred  
14 to it as diamonds. You say it is a huge diamond. We will come  
09:53:07 15 to that. But that item, that diamond, as you call it, you do not  
16 know its origin, that is from which country it came, do you?

17 A. No.

18 Q. You do not know how it was mined, do you?

19 A. No.

09:53:24 20 Q. You do not know the purpose or the reason behind the gift  
21 of that diamond to Ms Campbell, do you?

22 A. No.

23 Q. You do not know whether the person who sent that diamond to  
24 Ms Campbell had with them other diamonds in South Africa at that  
09:53:46 25 very moment?

26 A. No.

27 Q. Now, you have told us today in court that you did not see  
28 the diamond, yes?

29 A. Correct.

1 Q. You spoke with the Prosecution last year. You spoke with  
2 them first, I believe, sometime in August; Mr Koumjian, learned  
3 counsel opposite, sent you an email on August 10, right?

4 A. I believe that's the date, yes.

09:54:12 5 Q. Do you have difficulty remembering the date?

6 A. Yes. I know it was about a year ago.

7 Q. But my question was: Do you have difficulty remembering  
8 exactly the date when he sent you that email?

9 A. I think August 10 or - 9th or 10th sounds about right.

09:54:32 10 Q. And he subsequently called you because you provided him  
11 with your telephone number, yes?

12 A. He requested - he contacted my manager and I provided him  
13 with my contacts, yes.

14 Q. Yes. Now, when you spoke with Mr Koumjian, eventually some  
09:54:55 15 of what you said was reduced to a declaration that you signed.  
16 And you signed that declaration on 9 November last year, correct?

17 A. Correct.

18 Q. In that declaration, just like you have said in court  
19 today, you indicated there as well that you did not see the  
09:55:13 20 diamond. True?

21 A. True.

22 Q. Is it fair to say, Ms Farrow, that your testimony, what you  
23 have told the Court today, that the declaration you signed for  
24 the Prosecution, the information in both cases are based on your  
09:55:34 25 recollection of what you heard about 13 years ago?

26 A. Yes.

27 Q. It is, indeed, more precise to say that your recollection  
28 of these events is based on what you, Ms Farrow, believed you  
29 heard Naomi Campbell say about 13 years ago?

1 A. May I say I also discussed it with my children and they  
2 remember exactly the same thing. It was sort of an unforgettable  
3 moment. I may be fuzzy on surrounding details but I remember  
4 when she came in on the breakfast and said she had received a  
09:56:18 5 diamond from Charles Taylor.

6 Q. May I repeat my question - I appreciate your response, but  
7 I want to get an answer to my question.

8 A. Sorry.

9 Q. And my question is this: That your recollection of the  
09:56:31 10 events of 1997 is based on what you, Ms Farrow, believes you  
11 heard Naomi Campbell say 13 years ago?

12 A. Correct.

13 Q. Very well. You said you discussed it with your children as  
14 well?

09:56:50 15 A. Yes.

16 Q. That's the first time you're saying that to the  
17 Prosecution, being present in this courtroom. You've never told  
18 the Prosecution before that that you discussed this issue with  
19 your children, correct?

09:57:04 20 A. No, I told them yesterday.

21 Q. Well, it is not in the disclosures we have received from  
22 the Prosecution, they merely say that your children were present  
23 and they merely tell us that your children were at the breakfast  
24 table but they did not disclose that to us, that's why it came as  
09:57:24 25 a surprise to me.

26 A. Yes.

27 Q. You appreciate that?

28 A. I do, and it was only just before I left my daughter Malone  
29 said, "Oh, I remember so well", and she remembers Naomi's

1 statement.

2 Q. Malone, your daughter?

3 A. My daughter.

4 Q. Born in 1985?

09:57:40 5 A. Correct.

6 Q. She was 12 in 1997?

7 A. Yes.

8 Q. Your son, Matthew, born in 1970, he was the oldest then?

9 A. Yes.

09:57:50 10 Q. He was about 16, 17?

11 A. Yes.

12 Q. And your son Ronan?

13 A. Yes.

14 Q. Formally known as Satchel?

15 A. Yes.

16 Q. Also known as Seamus?

17 A. Yes.

18 Q. Yes. Born in 1985?

19 A. Yes.

09:57:59 20 Q. How old was he in '87?

21 A. Well, he was - he was born in '85.

22 Q. '87.

23 A. In '97 you mean?

24 Q. No, he was born in '87.

09:58:12 25 A. '87, so he was ten.

26 Q. And how old was he in '95 - '97?

27 A. Ten.

28 Q. Ten. So you were there with a 16 or 17 year-old, a 12  
29 year-old and a 10 year-old?



1 A. Correct.

2 Q. And you are telling the Court that your 12 year-old says  
3 she remembers the events as well?

4 A. Correct.

09:58:29 5 Q. Very well. Now, let's examine your recollection. What you  
6 believe you heard from Naomi Campbell. You said you heard her  
7 speak of a huge diamond, correct?

8 A. Correct.

9 Q. There are two parts to that I want us to consider. The  
09:58:49 10 word "huge." In your declaration you refer to it as a large  
11 diamond, something that's big. The second part is the word  
12 "diamond", you use it in the singular.

13 A. Yes.

14 Q. This morning in your evidence before the Court you said  
09:59:09 15 "diamond" again. You said you believe it was a diamond. You  
16 don't believe Naomi Campbell used the plural, "diamonds", yes?

17 A. Yes.

18 Q. Now, Naomi Campbell, as you have heard counsel read in  
19 court today, when she testified last week said that there were  
09:59:30 20 "two to three small dirty looking stones". For counsel's  
21 benefit, this is at page 45473, 45484, 4570 - 45470, 45484 of  
22 last week's transcript of 5 August. She said "two to three small  
23 dirty looking stones". That's Naomi Campbell. Are you following  
24 me?

10:00:07 25 A. I am.

26 Q. Carole White, who is due to testify after you today, former  
27 agent for Ms Campbell, a woman who says she was present, says she  
28 was present when the diamonds were given to Ms Campbell. Carole  
29 White gave an interview to the Prosecution. Notes were prepared

1 from that interview. The interview took place on 13 May this  
2 year. Regarding the diamonds Carole White said, listen closely.  
3 She first said there were six small greyish pebbles. Six. She  
4 then amplified that characterisation and said, "Well, perhaps  
10:01:06 5 possibly five to eight."

6 So we have your account of a diamond, a large diamond;  
7 Naomi's Campbell's account of two or three small dirty looking  
8 stones; Carole White's account of six small greyish pebbles. Do  
9 you follow me?

10:01:31 10 A. Yes.

11 Q. The Prosecution interviewed you yesterday, correct?

12 A. Correct.

13 Q. They also interviewed Carole White yesterday?

14 A. Uh-huh.

10:01:40 15 Q. Yesterday Carole White said, and the Prosecution gave us  
16 these notes, she told the Prosecution yesterday, here in The  
17 Hague, that she told her lawyer on 28 January this year that  
18 there were five uncut diamonds. So Carole White in one interview  
19 on May 13 said there were six, possibly five to eight; yesterday  
10:02:13 20 in The Hague she said there were five. Both Ms White and  
21 Ms Campbell speak in the plural, "diamonds". Both Ms White and  
22 Ms Campbell speak of "small tiny diamonds". You speak of a  
23 diamond. Do you stand by your account that it was a "huge  
24 diamond"?

10:02:34 25 A. Yes, but, sir, I didn't see the diamond or diamonds. I can  
26 only tell you what Naomi Campbell said.

27 Q. Yes, we appreciate that. Do you stand by your account that  
28 Naomi Campbell only spoke of a single diamond?

29 A. Yes. That's the way I --

1 Q. Are you absolutely sure of that?

2 A. That's what I recall to the best of my ability.

3 Q. Is it possible, Ms Farrow, that your recollection is in  
4 error?

10:03:01 5 A. No, I think I would have remembered diamonds in the plural.

6 Q. But a lot of time has passed since then, Ms Farrow, you  
7 will agree?

8 A. Yes.

9 Q. A lot of events have taken place, yes?

10:03:14 10 A. Mm-hm.

11 Q. Is that a yes?

12 A. Yes.

13 Q. When you say "mm-hm" the transcript does not pick up your  
14 response.

10:03:21 15 A. Sorry.

16 Q. That's why I'm asking you if it's a yes.

17 A. Sorry, yes.

18 Q. You have led a rather busy life publicly from 1997 until  
19 now, yes?

10:03:31 20 A. Yes.

21 Q. You have made several trips to Africa, in particular the  
22 Darfur and eastern Chadian regions, yes?

23 A. Yes.

24 Q. You have had some losses during this period of time, this  
10:03:42 25 13-year period of time?

26 A. Correct.

27 Q. Your brother, Patrick Joseph, unfortunately, died last  
28 year?

29 A. Correct?

1 Q. You lost a daughter on Christmas Day in 2008, yes?

2 A. Correct.

3 Q. So a lot has happened to you in this 13-year period of  
4 time?

10:03:59 5 A. Correct.

6 Q. And you stand by your account that it was a large diamond?

7 A. I can only tell you what I remember in the way that I  
8 remember it.

9 Q. Now, do you know somebody by the name of Jeremy Ractliffe?

10:04:15 10 A. I know that he was the - one of the, or the director of  
11 Nelson Mandela's children's charity. The name was familiar to me  
12 but I think I know this information because of what I've recently  
13 read.

14 Q. Yes. What you have recently read. Ms Campbell testified  
10:04:40 15 in court, told these Justices, that she gave the diamonds to  
16 Jeremy Ractliffe. Now, since Ms Campbell appeared in court last  
17 week, Mr Ractliffe has been all over the news, and I want us to  
18 consider some of what he has told news agencies.

19 Madam President, with leave of your Honours, if it please  
10:05:05 20 the Court, I gave the Court Manager before we commenced a bundle  
21 of documents to be used during the examination of this witness.  
22 I wonder if they could be distributed to the Prosecution as well  
23 as everybody here present.

24 PRESIDING JUDGE: While that is being done, may I inquire  
10:05:26 25 of Ms Farrow, when did you say your son Matthew was born?

26 THE WITNESS: 1970.

27 PRESIDING JUDGE: That would put his age in 1997 to 27.

28 THE WITNESS: No. Is that correct? He was born in 1970.

29 In - yes, that's correct. Is that right? Yes, yes. Yes,

1 your Honour, I'm so sorry. Math is not my forte. But, yes, he  
2 was an adult.

3 PRESIDING JUDGE: So Matthew was 27 at that dinner, was he?

4 THE WITNESS: I guess he was, yes.

10:06:13 5 MR ANYAH: Thank you, Madam President. Can we please  
6 display the document in tab 2, please, and could a copy be given  
7 to Ms Farrow.

8 Q. Ms Farrow, could you read that document to yourself,  
9 please.

10:07:04 10 A. I have read that statement.

11 MR ANYAH: Now, may it be displayed for the public. Thank  
12 you, Madam Court Usher.

13 Q. Now, we see that this is a document from the BBC Africa  
14 section. It is dated 6 August, that is, Friday last, 2010. The  
10:07:37 15 title is "Mandela charity official 'received Campbell diamonds'".  
16 Do you see the use of the word plural, "diamonds"?

17 A. I do.

18 Q. It reads:

19 "The former head of Nelson Mandela Children's Fund, Jeremy  
10:08:01 20 Ractliffe, has said he did receive uncut diamonds from the model  
21 Naomi Campbell. He issued a statement after her testimony at the  
22 war crimes trial of ex-Liberian leader, Charles Taylor.

23 It is alleged she received the gems from Mr Taylor in 1997,  
24 which could link him to illegal 'blood diamonds'.

10:08:38 25 Mr Ractliffe said he was happy to testify in The Hague and  
26 had now handed the stones over to the authorities."

27 And here is the part I would like you to listen to,  
28 Ms Farrow. He is quoted as saying this:

29 "' Three small, uncut diamonds were given to me by Naomi

1 Campbell on the Blue Train on 26 September 1997,' he said in a  
2 statement sent to the BBC.

3 South Africa's special Hawks police unit has since  
4 confirmed to the BBC that they received the stones from  
10:09:30 5 Mr Ractliffe on Thursday, who first made contact with them on  
6 Tuesday.

7 It said the diamonds were now being tested to find out  
8 their origin."

9 Shall we go over to page 2, please? Yes. I will scroll  
10:09:52 10 down a little bit to the part that refers to a quote from  
11 Mr Ractliffe. It starts with, "Naomi suggested," and you see  
12 that there are quotation marks, meaning it comes from  
13 Mr Ractliffe:

14 "'Naomi suggested they could be of some benefit to the  
10:10:10 15 Nelson Mandela Children's Fund (NMCF), but I told her I would not  
16 involve the NMCF in anything that could possibly be illegal,'  
17 Mr Ractliffe said."

18 Scroll down a few lines. He says, "In the end, I decided I  
19 should just keep them. 'A factor that influenced me not to  
10:10:39 20 report the matter to anyone was to protect the reputation of the  
21 NMCF, Mr Mandela himself, and Naomi Campbell, none of whom were  
22 benefiting in any way.'"

23 Just pause there. The first page of the article,  
24 Mr Ractliffe refers to the date, 26 September 1997, as being the  
10:11:09 25 date on which Ms Campbell gave him the diamonds. Does that  
26 refresh your recollection to the time period around when these  
27 events happened?

28 A. No. I know - I only know it was in 1997. I would have to  
29 look at the itinerary of the Blue Train and when it departed and

1 so forth, but I assume he has that information.

2 Q. We have a copy of the official programme. We will get to  
3 it in a minute. Perhaps that will help at that point.

4 Now, did you hear me read that Mr Ractliffe said that there  
10:11:45 5 were three small, uncut diamonds? Did you hear me read that?

6 A. Yes, sir.

7 Q. So now we have accounts from three people, three persons  
8 who were in South Africa, involved in these events, Ms Campbell,  
9 Ms White and Mr Ractliffe, all referring to diamonds in the

10:12:07 10 plural. Do you follow me?

11 A. Mm-hm.

12 Q. We have those same three persons all saying that they were  
13 small in size, yes?

14 A. Yes.

10:12:15 15 Q. Do you stand by your testimony that it was a diamond and it  
16 was a huge diamond?

17 A. My --

18 JUDGE LUSSICK: That wasn't the testimony. The witness  
19 said she was told it was a diamond. She has said time and time  
10:12:32 20 again she didn't see the diamond. That's not her testimony, that  
21 she said it was a diamond. She said she was told it was a  
22 diamond.

23 MR ANYAH: I appreciate - thank you, Justice Lussick. I  
24 appreciate the distinction. I will rephrase the question.

10:12:44 25 Q. I am trying to be fair to you. I am not trying to mislead  
26 you, Ms Farrow. What I am asking you is: Do you stand by your  
27 recollection that what you heard Naomi Campbell say was that this  
28 was a huge or large diamond?

29 A. That's what I recall she said. The other witnesses you

1 mentioned actually saw the diamond or diamonds. I did not. I  
2 can only recall what Naomi Campbell said, to the best of my  
3 ability.

4 Q. Now, see, the difficulty that we have is that the  
10:13:25 5 Prosecution, learned counsel opposite, have adopted your version  
6 in this trial. The questions they put to Mr Taylor on 14 January  
7 of this year seemingly adopts your account of the events. Shall  
8 I read to you some of what was asked of Mr Taylor this year in  
9 court? This is from the transcript of 14 January 2010. The  
10:13:57 10 relevant page number is page 33339. 14 January, 33339. Yes, the  
11 transcript is up. Can you see it on your monitor?

12 A. I can.

13 Q. So here is the Prosecution in January of this year  
14 cross-examining Mr Taylor. Learned counsel opposite, Ms Hollis,  
10:14:34 15 was asking the questions. On a few preceding pages that I have  
16 not asked to be brought up, it was established that it was a trip  
17 to South Africa in September 1997. This is at page 33336, that  
18 supermodel Naomi Campbell was present, the actress Mia Farrow was  
19 present, that Mr Quincy Jones was present, and then we get to  
10:15:05 20 this page. Line 6, Mr Taylor was asked:

21 "Q. In fact, from among those diamonds that you took to  
22 South Africa, after this dinner that you attended you sent  
23 your men to Ms Campbell's room to provide her with a large  
24 rough-cut diamond. That's correct, is it not, Mr Taylor?"

10:15:34 25 A. That is totally incorrect."

26 Ms Farrow, did you hear the reference and can you read the  
27 reference there to a large rough-cut diamond?

28 A. Yes.

29 Q. So the Prosecution's theory, at least as of January this



1 year when they put their questions to Mr Taylor, is consistent  
2 with your recollection of what you heard Naomi Campbell say, that  
3 it was a large diamond, true?

10:16:09 4 A. May I - I was asked by the Prosecution whether I had seen  
5 the diamond or diamonds. I said no. They asked if they were -  
6 if I knew whether they were rough or uncut. I said I did not. I  
7 said I can only contribute a very, very small piece to this, and  
8 that is what Naomi Campbell said that morning. To the best of my  
9 ability she said a large diamond, singular. That's what she  
10:16:37 10 said.

11 Q. Let me repeat my question, and I appreciate your answer  
12 because it helps me rephrase it. The Prosecution's theory, what  
13 I read, was that it was a large rough-cut diamond. You have said  
14 the part of that that's consistent with your recollection is the  
10:16:55 15 part that it was a large diamond, correct?

16 A. Correct.

17 Q. You did not know whether it was uncut or not, correct?

18 A. Correct.

19 Q. Very well. But do you see that the Prosecution's theory in  
10:17:09 20 this case is consistent with the proposition that it was a large  
21 diamond? Yes?

22 A. Yes.

23 Q. Thank you. Now, thank you, Madam Court Usher.

24 Let's continue to re-examine your recollection of the  
10:17:27 25 events in September. You did not remember the month in the year  
26 1997 when this took place, correct?

27 A. Correct. Even when the Prosecution contacted me, I didn't  
28 remember which year it was, so --

29 Q. Exactly.

1 A. -- that is true.

2 Q. Yes.

3 A. I'm not very good on dates.

4 Q. And indeed, when you spoke with the Prosecution and the  
10:17:53 5 declaration that you signed, you were not sure about how many men  
6 exactly there were that went to Ms Campbell's door. You said two  
7 or three, and then you said, "I do not recall how many." Is that  
8 correct?

9 A. That's correct. I think it's that I don't recall whether  
10:18:14 10 she said how many men.

11 Q. So there are some aspects of what Ms Campbell said or may  
12 not have said that you do not recall?

13 A. It might have been "men". It might have been "two men".  
14 It might have been "three men". But it was more than one man.

10:18:34 15 Q. My question is: There are some aspects of what Ms Campbell  
16 said or failed to say that you do not recall?

17 A. Correct.

18 Q. Thank you. This dinner that you spoke of earlier today in  
19 court, you gave us the names of some of those who were present,  
10:18:56 20 but you do not know whether Charles Taylor was present at that  
21 dinner, do you?

22 A. I do not know whether he stayed for dinner.

23 Q. Indeed, when you spoke with the Prosecution and the  
24 declaration that you signed, it indicates that, as far as you  
10:19:11 25 believe, he left before the dinner, correct?

26 A. I can't say whether he stayed for dinner or not. Perhaps  
27 that would be most accurate to say I don't know.

28 Q. But I just want to go back to my question, whether in the  
29 declaration that you signed it reads that you believe he may have

1 departed?

2 A. I believe he may have departed.

3 Q. Thank you. You are aware that Ms Campbell says Mr Taylor  
4 was present at the dinner?

10:19:44 5 A. He may have stayed for - perhaps she has a better  
6 recollection of that dinner. He went out of my consciousness. I  
7 was with my children and not focused on Mr Taylor.

8 Q. Are you aware that Carole White, another person who claims  
9 to have been present at the dinner, says that Mr Taylor was  
10:20:04 10 present at the dinner?

11 A. Well, they would know. It was a large dinner, and he was  
12 not seated anywhere next to me, so I - I just don't remember him  
13 at dinner.

14 Q. Are you aware that Carole White, who claims she was there,  
10:20:19 15 says not only was Mr Taylor present, present with him there was  
16 an official of the Government of Liberia. Are you aware of that?

17 A. I was not aware of that, no.

18 PRESIDING JUDGE: Ms Farrow, when you described the dinner  
19 as a large dinner, give us an indication of how large this dinner  
10:20:37 20 was, in terms of persons sitting, maybe tables at which the  
21 persons were sitting, one, two, three, tables.

22 THE WITNESS: Certainly three tables, perhaps more. I -  
23 I'm sorry, it seemed a large group, more than 20, but I - again,  
24 I don't remember, just that it was a large group, and I didn't  
10:21:09 25 know many of the people there. It wasn't just our group. Sorry,  
26 your Honour, I can't be more precise.

27 JUDGE LUSSICK: Ms Farrow, at the dinner, did you - were  
28 you aware that - I am sorry, you're looking --

29 THE WITNESS: I'm sorry, I'm not sure who is speaking.

1 JUDGE LUSSICK: It's me.

2 THE WITNESS: Oh, sorry, yes, your Honour.

3 JUDGE LUSSICK: I am asking you a question. At the dinner,  
4 did you know of Charles Taylor at that stage?

10:21:44 5 THE WITNESS: When I entered the residence of President  
6 Mandela, there was a group of men standing in a rather large  
7 space, and it was then that, I think I've said before, Mrs Graca  
8 Machel said, "You don't want" - in effect, "You don't want  
9 anything to do with him. He's not supposed to be here," or, "He  
10 should have left. Come over here." And she ushered the children  
11 and me to a different section, so - but during the actual dinner,  
12 I don't know where he was seated or that he was seated. I can't  
13 - I can't swear that he was there, nor can I swear that he was  
14 not.

10:22:28 15 JUDGE LUSSICK: But prior to the dinner, had you ever heard  
16 of him before?

17 THE WITNESS: No. He was introduced, though, he did come  
18 up, as the President of Liberia, but I didn't know much about him  
19 in 1997.

10:22:44 20 JUDGE LUSSICK: All right.

21 THE WITNESS: Or anything about him.

22 JUDGE LUSSICK: All right. Thank you.

23 I am sorry to interrupt, Mr Anyah.

24 MR ANYAH: Thank you, Justice Lussick. Thank you, your  
25 Honours.

26 Q. Ms Farrow, you just said that there were quite a number of  
27 people at this dinner. Did you use the figure about 20 or more  
28 than 20 just now?

29 A. You know, I'm not really comfortable giving you a number.

1 I wish I could, but I can't. We'd have to get the guest list.

2 It seemed to me to be a large group.

3 Q. When you say "large", do you mean more than a dozen people?

4 A. I do.

10:23:17 5 Q. Thank you. You said there were perhaps three tables, two  
6 to three tables, at this dinner?

7 A. Maybe more even. I'm - I'm sorry, I can't be precise on  
8 that.

9 Q. When Ms Campbell testified before the Court on Thursday,  
10:23:32 10 she said there was one table. Are you aware of that?

11 A. No.

12 Q. Now, Ms Carole White told the Prosecution, at least in  
13 documents disclosed to us from their interview of 13 May this  
14 year, that there was some mild flirtation taking place at the  
10:23:53 15 dinner table between Mr Taylor and Naomi Campbell. Did you hear  
16 any conversations or flirtations between Campbell and Mr Taylor  
17 at that dinner?

18 A. No, sir. If there was one table it would have been a very  
19 long table and Ms Campbell and Charles Taylor, if he was there,  
10:24:13 20 would have been out of my sight and certainly out of my  
21 consciousness. I did not see any flirtation - any flirtation or  
22 communication.

23 Q. I'm not asking you whether they were out of your sight or  
24 consciousness, I appreciate your response, but you tell us you  
10:24:32 25 were at a dinner, another person says these two persons were at  
26 the dinner, Ms Campbell corroborates that they were at the  
27 dinner. The issue here is whether you heard her flirtations.  
28 Did you hear flirtations between these two persons when you were  
29 at the dinner?

1 A. No, I did not.

2 Q. As you sit there now, is it fair to say that you remember  
3 sitting amongst your children at the dinner?

4 A. Correct.

10:25:02 5 Q. Do you remember where it was that Naomi Campbell sat during  
6 the dinner?

7 A. No. No, I do not.

8 Q. Do you remember whether she sat at the same table as you  
9 did with your children?

10:25:13 10 A. I do not.

11 Q. Do you know whether Carole White was present at the dinner?

12 A. No, I don't.

13 Q. You told us earlier today you do not remember Carole White,  
14 correct?

10:25:24 15 A. Correct.

16 Q. So that is somebody you met - you met at this dinner, yes?

17 A. I don't know where I met her. Maybe before the dinner,  
18 maybe at the dinner I --

19 Q. But sometime in South Africa while you were there for the  
10:25:42 20 Blue Train event you met somebody called Carole White?

21 A. Presumably I did.

22 Q. And the fact is as of today, as you sit there now, you do  
23 not remember this person, yes?

24 A. Correct.

10:25:58 25 Q. They have shown us a photograph that was taken of the  
26 group, some of those present at the dinner, and it shows you  
27 wearing traditional African attire. If we could have it  
28 produced. This is Defence exhibit 424, please.

29 MR KOUMJIAN: Actually for the Court's information, I don't

1 know if she has it with her. But we provided the original to  
2 Court Management of this photograph, if the witness would like to  
3 keep it. But for the Court to see the original, the original is  
4 available.

10:26:42 5 MR ANYAH: Thank you, counsel opposite. If it is the same  
6 photograph of course the original should be shown to the witness.

7 Q. Ms Farrow, can you look at the photograph?

8 A. Yes.

9 Q. Incidentally, does that photograph belong to you?

10:27:19 10 A. It does.

11 Q. It's one of the memories you keep from that event from  
12 1997, yes?

13 A. Yes. They gave me an entire scrapbook.

14 PRESIDING JUDGE: Can you please put the photograph on the  
10:27:33 15 overhead.

16 MR ANYAH: For everyone's benefit, Madam President, this is  
17 also to be found in our Defence set of documents behind tab 5.  
18 It's the first photograph behind tab 5 in the Defence bundle of  
19 documents.

10:27:55 20 Q. Now, Ms Farrow, this document that we're looking at, you  
21 are shown, if you look from right to left - you are shown next to  
22 Mr Tony Leung, a Chinese film actor?

23 A. Correct.

24 Q. And the attire that you are wearing, is it fair to say that  
10:28:14 25 it is traditional African attire?

26 A. Yes.

27 Q. Are you aware that this Court was - well, are you aware  
28 that Ms Carole White indicated that the Liberian official that  
29 was with Mr Taylor at this dinner wore traditional African

1 attire?

2 A. No, sir.

3 Q. Besides Mr Mandela and Ms Machel, was there anyone else at  
4 the dinner wearing traditional African attire?

10:28:54 5 A. I don't recall.

6 Q. Now let's just look at those present. From left to right  
7 we have Ms Jemima Khan, a British socialite, correct?

8 A. Correct.

9 Q. At the time she was married to the man next to her, Imran  
10:29:10 10 Khan, yes?

11 A. Correct.

12 Q. You referred earlier in your testimony to Mr Khan being a  
13 soccer player. He is actually a cricketer?

14 A. Sorry.

10:29:19 15 Q. Do you recall him being a cricketer from Pakistan?

16 A. I recall that he was a famous sports figure.

17 Q. That's understandable. Now, the next person pictured is  
18 Ms Naomi Campbell, yes?

19 A. Correct.

10:29:34 20 Q. And we're moving from left to right. And then we have  
21 Mr Charles Taylor, yes?

22 A. Yes.

23 Q. Of course His Excellency President Mandela?

24 A. Yes.

10:29:47 25 Q. And then we have Ms Graca Machel?

26 A. Yes.

27 Q. She was then his partner, not yet his wife?

28 A. Correct.

29 Q. Do you know the name of the lady that's next to Ms Machel?



1 A. She is - was the partner of Quincy Jones and I think her  
2 name was Lizette something, but, I'm sorry, I don't remember her  
3 full name.

4 Q. Thank you. And can you spell Lizette?

10:30:15 5 A. I'm reluctant to provide any name at all, since I'm not  
6 certain.

7 Q. Thank you. And then there is music producer Quincy Jones,  
8 yes?

9 A. Correct.

10:30:26 10 Q. There is yourself, Ms Farrow?

11 A. Yes.

12 Q. And the last person to your left is Mr Tony Leung?

13 A. Yes.

14 Q. Thank you. Now, we will come back to this photograph, but  
10:30:38 15 I raised it to ask you about the attire worn by the Government of  
16 Liberia official as told to the parties by Carole White. Do you  
17 follow me? Now, have you had any contact whatsoever, apart from  
18 the ones you have told us about with Naomi Campbell, that is the  
19 one where she contacted you to participate in an interview on her  
10:31:10 20 behalf - since that time have you had any contact with  
21 Ms Campbell?

22 A. Well, there was the second trip, don't forget.

23 Q. Yes.

24 A. And then there was the magazine interview after which we  
10:31:27 25 communicated. And I've not had any communication with her since  
26 I moved out of New York and we drifted apart. I've not had any  
27 communication with her since.

28 Q. Let me try and see if we can put some dates to these  
29 events. When did you move out of New York?

1 A. 1994.

2 Q. You moved out of New York in 1994?

3 A. Wait a minute. I think that's - that's correct. Roughly.

4 Q. You are sure about that?

10:32:08 5 A. '93, '94.

6 Q. Well, let me use some events to refresh your recollection.

7 Did you move out of New York after the resolution of the child  
8 custody issues in '93 with Mr Woody Allen?

9 A. Yes.

10:32:30 10 Q. You moved to {redacted}?

11 A. Yes.

12 Q. And you have a home in {redacted}?

13 A. Correct.

14 Q. In {redacted}?

15 A. Yes.

16 Q. It's called {redacted}, or something like that?

17 A. Yes.

18 Q. It's in {redacted}?

19 MR KOUMJIAN: Excuse me. We don't normally ask witnesses  
10:32:46 20 to divulge where they live and I would ask that to be redacted  
21 from the public record.

22 MR ANYAH: Madam President, this is in the New York Times,  
23 this information I am asking. The county in which the witness  
24 resides is in the New York Times. I have the articles here.  
10:33:03 25 They are all public knowledge. But it is not central to my  
26 inquiry and I have no quarrels with them redacting the county,  
27 but as far as it is the state of {redacted}, a state with  
28 millions of residents, our position is that it remains on the  
29 record.

1 JUDGE LUSSICK: But how is it relevant, Mr Anyah?

2 MR ANYAH: I am trying to jog the witness's memory to the  
3 time period when she had contacts with Ms Campbell. The witness  
4 doesn't seem to remember, but if we have milestones - she  
10:33:33 5 indicated after she moved out of New York she has not had contact  
6 with Ms Campbell. So [microphone not activated] a milestone if  
7 we can know when exactly it was she moved out of New York.  
8 That's the purpose of this inquiry.

9 PRESIDING JUDGE: May I just observe, Mr Koumjian, that  
10 normally witnesses are not asked these personal details but that  
11 is if they are protected witnesses. I am not given to understand  
12 that Ms Farrow is a protected witness and so the record will  
13 remain.

14 MR ANYAH:  
10:34:05 15 Q. Ms Farrow, let me short-circuit this a little bit. Can we  
16 go to the Defence set of documents, tab 5, please?

17 A. While we are going to that, may I just say one thing.

18 Q. Yes.

19 A. I don't think my moving out of New York is relevant to my  
10:34:22 20 contact with Naomi Campbell. I think we just drifted apart. She  
21 lived in England, I rarely came into the city and I didn't see  
22 her again and I didn't hear from her after that - the article to  
23 which I contributed, which was about her and she sent me a lovely  
24 note and some flowers after that article. And I don't think I  
10:34:42 25 have had any contact with her since, though I did try to contact  
26 her but - at one point, after these proceedings.

27 Q. Yes. If you have the documents behind tab 5, can we go to  
28 the document that appears - it's a photograph actually. It  
29 appears - it's the second to last photograph in that tab. Tab 5,

1 Madam Court Usher. Indeed, you may want to just take out most of  
2 the photographs in tab 5. May that photograph be displayed for  
3 the public, please.

4 PRESIDING JUDGE: Mr Anyah, I am not quite sure what  
10:35:40 5 photograph you are referring to. It depends on the order in  
6 which they were filed in our tabs.

7 MR ANYAH: Yes, I said it would be the second to last  
8 photograph in tab 5. Indeed, I will be using both the second to  
9 last one and the last one. Yes, Madam President. It's a black  
10:35:57 10 and white photograph, if that assists.

11 Q. Ms Farrow, have you seen the photograph?

12 A. I see it now. It's the first I've seen of it, yes.

13 Q. This is from the ABC News website?

14 A. Yes.

10:36:12 15 Q. And below the photograph is the caption:

16 "In 1998, Naomi Campbell went back to South Africa with Mia  
17 Farrow and a group of top models, including Kate Moss and Christy  
18 Turlington, all pictured here with South African President Nelson  
19 Mandela. Campbell staged a benefit fashion show for the Nelson  
10:36:45 20 Mandela Children's Fund."

21 Do you see that, Ms Farrow?

22 A. Yes.

23 Q. Is it the case then that on the following year, 1998, you  
24 returned to South Africa at the request of Naomi Campbell?

10:37:02 25 A. That is correct.

26 Q. And was this event in South Africa also partly connected to  
27 the late fashion designer Gianni Versace?

28 A. I believe he was the - the event initiated by Naomi  
29 Campbell featured the designs of Versace.

1 Q. Thank you. Can you identify for us, Ms Farrow, some of  
2 those pictured with you in that photograph. And usually we have  
3 a witness switch seats, to the next seat, so that we can follow  
4 their demonstration.

10:37:54 5 A. This is a different photograph. Okay, this one. Yes.

6 PRESIDING JUDGE: You will have to leave it on the overhead  
7 so we can see as you point.

8 THE WITNESS: Okay. On the right would be Christy  
9 Turlington.

10:38:11 10 PRESIDING JUDGE: Would you please use your pen to point.

11 THE WITNESS: Sorry. Ms Turlington. Naomi Campbell.  
12 Nelson Mandela. Kate Moss. I don't know who that is. Myself  
13 and my son Ronan.

14 MR ANYAH: Thank you, Ms Farrow. You may return to your  
10:38:34 15 seat.

16 PRESIDING JUDGE: Mr Anyah, I don't know how important this  
17 is for you, but the witness pointing is not going to be captured  
18 on the record. Do you want her to mark the photograph? Is this  
19 important.

10:38:54 20 MR ANYAH: Well, it is not really relevant to my inquiry.  
21 The caption underneath the photograph gives the names of some of  
22 those pictured. All I would merely request is that your Honour  
23 would, with respect, give us an identification number for the  
24 photograph.

10:39:07 25 PRESIDING JUDGE: Very well. I will simply say for the  
26 record that the witness has indicated in this photograph  
27 depicting from left - from right to left the persons that she has  
28 named in the front row. And the picture will be marked MFI-12.

29 MR ANYAH: Thank you, Madam President. Now, while we still

1 have the photos from tab 5, let us just leave them for a second.

2 Q. Ms Farrow, one or two questions about what we just saw, the  
3 last photograph. When you met Ms Campbell again in 1998 in South  
4 Africa was Ms Carole White present?

10:39:53 5 A. I don't know. We met in New York and I flew with two of my  
6 children and Ms Campbell and a group of models to South Africa.  
7 I don't remember if - I don't remember Ms White on the first trip  
8 or the second, I'm sorry.

9 Q. When you saw Ms Campbell in South Africa again, a year  
10:40:22 10 after the two of you had been together in 1997, this time in  
11 1998, did you ask Ms Campbell, "Oh, by the way, whatever happened  
12 to that diamond you received from those men?" Did you ask her  
13 that question?

14 A. No, I did not.

10:40:38 15 Q. Very well. Now, still at tab 5, you see the group  
16 photograph, the first photograph we looked at, Ms Farrow, the one  
17 with the group, the one that you have a personal copy. Could you  
18 take a close look at President Mandela and Mr Taylor, in  
19 particular look at what they were wearing at that dinner.

10:41:05 20 Madam Court Usher, could you display the photograph,  
21 please.

22 Can you describe for us what you believe Mr Mandela is  
23 wearing as he is pictured in that photograph?

24 A. He's wearing one of his very famous Nelson Mandela shirts.  
10:41:29 25 He always had a great shirt.

26 Q. And can you describe what you believe Mr Taylor is wearing  
27 in that photograph?

28 A. A brown suit, buttoned to the neck, without a tie.

29 Q. Now, you have told us that upon arrival at the dinner some

1 men were already there, yes?

2 A. Yes.

3 Q. You have told us that you met Ms Graca Machel and the men  
4 moved towards you, yes?

10:42:12 5 A. Mrs Graca Machel received me and the children, yes. Some  
6 men moved toward me. I don't remember whether I was introduced  
7 to him, to Charles Taylor, at that moment or a little bit later,  
8 but I remember clearly this: That Mrs Machel shepherded me and  
9 the children to another part of the room and said, "You don't  
10:42:45 10 want to be photographed or to be around this man. He should have  
11 left", or something to that effect, "He should have left, he's  
12 not supposed to be here", and she seemed a little distressed.

13 Q. Yes, that's what I wanted to ask you about. You stand by  
14 that account?

10:43:07 15 A. Uh-huh.

16 Q. That is what Graca Machel said, yes?

17 A. Yes.

18 Q. Did that leave you with the impression that Mr Taylor was  
19 not invited to that dinner?

10:43:19 20 A. Yes.

21 Q. And earlier in your testimony in court today you said it  
22 left you with the feeling that he was a person of disputable  
23 character, correct?

24 A. Correct.

10:43:34 25 Q. Now, if Ms Machel did not want you to be pictured with  
26 Mr Taylor, do you see that she is pictured in that photograph?

27 A. Yes.

28 Q. One person removed from Mr Taylor, yes?

29 A. Yes.

1 Q. You also appear in that photograph, correct?

2 A. Correct.

3 Q. His Excellency, President Mandela, appears in that  
4 photograph, yes?

10:44:00 5 A. Yes.

6 Q. They seem to be smiling, do they not, people seem joyous in  
7 that photograph, correct?

8 A. Correct.

9 Q. So it begs the question: If Ms Machel felt it necessary to  
10:44:15 10 remove you from the presence of Mr Taylor and to suggest that  
11 your photograph should not be taken with such a man, why she  
12 herself would feel comfortable being photographed with Mr Taylor.  
13 Do you follow me?

14 A. I can't speak to her frame of mind and comfort. I can only  
10:44:36 15 tell you what she said to me and what I deduced from that is that  
16 he was not invited for dinner and that she was trying to get him  
17 to leave. That said, he was the President of Liberia and I  
18 assumed she had a - certain formal obligations.

19 Q. Well, a President doesn't just show up at a dinner  
10:45:03 20 uninvited, would you agree with that?

21 A. I don't know.

22 MR KOUMJIAN: That is calling for speculation.

23 MR ANYAH: Madam President, the witness has significant  
24 life experiences in the circles of very important people, and the  
10:45:17 25 witness can certainly comment on such a matter.

26 THE WITNESS: My impression, sir, was that he was not  
27 invited to dinner but that perhaps he had been there and that he  
28 had overstayed his meeting or his welcome. He had been there  
29 prior to - I was early. My children - I'm very prompt - my



1 children and I were the first to arrive. I got the impression  
2 that that meeting, whatever it was, should have been over and he  
3 should have been gone. And that's the impression I got from  
4 Mrs Machel; he should not be here, he was supposed to go by now.  
10:45:53 5 Those were the sorts of comments that I was getting from  
6 Mrs Machel.

7 MR ANYAH:

8 Q. But the fact is that Mrs Machel still allowed herself to be  
9 photographed with Charles Taylor, yes?

10:46:07 10 A. Yes.

11 Q. She still allowed you, Ms Farrow, to be photographed with  
12 Charles Taylor, correct?

13 A. Correct.

14 Q. President Mandela allowed himself to be photographed next  
10:46:21 15 to Charles Taylor, correct?

16 A. Correct.

17 Q. If we go to the next photograph on that series of  
18 photographs, in fact, we are going to need the next two  
19 photographs.

10:46:37 20 A. Sir, can I tell you one thing?

21 Q. If you --

22 A. Okay.

23 Q. If you could wait for me to ask the questions because  
24 there's a protocol in which the court runs.

10:46:47 25 A. Sorry.

26 Q. Thank you.

27 PRESIDING JUDGE: Did the witness want to address the Court  
28 on something?

29 THE WITNESS: Just, your Honour, that when the Prosecution

1 first contacted me I said that my contribution to these  
2 proceedings would be very, very minimal and the only two  
3 recollections I had was the reaction of Mrs Machel that evening,  
4 which was unusual, and the appearance of Ms Campbell in the  
10:47:26 5 morning with the story of diamonds in the night from Charles  
6 Taylor. I didn't know at the time I was saying it how relevant  
7 that would be to these proceedings or if they would be. So I  
8 just thought I would add that.

9 PRESIDING JUDGE: Ms Farrow, don't you worry, you're doing  
10:47:46 10 just fine. Just answer the questions that are put by either side  
11 or the Bench as truthfully as you can recall.

12 THE WITNESS: Thank you.

13 MR ANYAH:

14 Q. Ms Farrow, have you seen the photograph? It is a  
10:48:01 15 photograph of Charles Taylor with President Mandela. We have a  
16 larger version of this photograph, if you could also look at it,  
17 it will be made available to you. They are right next to each  
18 other. One is a smaller version and one is a larger version.  
19 Now, let's go to the smaller version because I wish to read  
10:48:22 20 what's underneath the photograph.

21 Underneath the photograph taken from ABC News it reads:

22 "President Nelson Mandela, left, and Liberian President  
23 Charles Taylor addressed the media at Mandela's State residence  
24 in Pretoria September 25, 1997", and in parenthesis it is  
10:48:50 25 attributable to Reuters. Do you see that, Ms Farrow?

26 A. I do.

27 Q. Do you notice that to the left of President Mandela there  
28 are microphones, there are things that appear to be microphones  
29 in that photograph?

1 A. I do.

2 Q. And, indeed, in the foreground of that photograph if you  
3 look closely, and you can look at the blow-up version as well, do  
4 you see what appears to be microphones right above the letters  
10:49:17 5 that are written beneath the photograph? They are round and they  
6 appear to be microphones.

7 A. Correct.

8 Q. This was, indeed, a media address between two Presidents on  
9 the same day of the dinner. Do you follow me?

10:49:36 10 A. I do.

11 Q. Do you see what both Presidents are wearing? Let's start  
12 with President Mandela.

13 A. Yes.

14 Q. Is that not identical to what President Mandela wore in the  
10:49:50 15 photograph that was taken around the time of the dinner?

16 A. It is.

17 Q. And do you see what Charles Taylor is wearing?

18 A. I do.

19 Q. In both photographs are they not one and the same attire?

10:50:03 20 A. Yes, it appears to be the same.

21 Q. That is the photograph that was taken around the time of  
22 the dinner and the photograph taken during the media press  
23 conference, they are one and the same clothing he was wearing,  
24 yes?

10:50:17 25 A. So it appears.

26 Q. Thank you. So what we have then is Charles Taylor meeting  
27 President Mandela, the two Presidents addressing the media at  
28 Mr Mandela's residence and a dinner being held in the evening at  
29 which Charles Taylor attends. Is your position that your

1 impression from what happened was that Charles Taylor overstayed  
2 his visit?

3 A. That was my impression.

10:50:55

4 Q. And you based your impression on what Graca Machel told  
5 you, yes?

6 A. Yes.

7 Q. Do you know somebody by the name of Samora Machel?

8 A. No.

10:51:09

9 Q. Do you know that Samora Machel was the first President of  
10 Mozambique?

11 A. Yes. Of course, yes.

12 Q. He was the first husband of Graca Machel?

13 A. Yes, of course.

14 Q. Do you know that Samora Machel was a revolutionary?

10:51:21

15 A. Yes.

16 Q. Are you aware that he was the head of the Front For the  
17 Liberation of Mozambique?

18 A. No.

10:51:39

19 Q. Are you aware that in 1964, if memory serves me right,  
20 Samora Machel was a military commander, he led the Front For the  
21 Liberation of Mozambique, in the north of Mozambique, and they  
22 engaged in a guerilla attack against the Portuguese colonial  
23 authorities. Are you aware of that?

24 A. No.

10:51:56

25 Q. Ms Machel was married to a revolutionary, a socialist  
26 revolutionary, a military commander. Are you aware that before  
27 she met President Mandela that at some point in time when he was  
28 in prison, I am speaking of President Mandela, the former  
29 apartheid regime branded him a terrorist? Are you aware of that?

1 A. Yes.

2 Q. Are you aware of the fact that the United States government  
3 was embarrassed by the fact that as late as 2008 the Secretary of  
4 State had to issue a waiver before President Mandela would be  
10:52:34 5 allowed to enter America? Are you aware of that?

6 A. No.

7 Q. Well I have a BBC article here that speaks about that, we  
8 can show it if necessary. But the point is, Ms Machel is no  
9 stranger to men that have previously been branded either as  
10:52:54 10 terrorists or as revolutionary fighters. She is a strong woman,  
11 correct?

12 A. I would think so.

13 Q. She is the only woman to be married to the President of two  
14 different countries, correct?

10:53:07 15 A. If you say so.

16 Q. Now, this woman, who has been with a guerilla fighter in  
17 Mozambique, someone who fought for independence in Mozambique and  
18 became the first President of Mozambique, do you think that  
19 Charles Taylor would make such a woman uncomfortable?

10:53:27 20 A. It depends on --

21 MR KOUMJIAN: It is calling for her to speculate about  
22 somebody else's state of mind.

23 MR ANYAH: Well, Madam President, I can rephrase the  
24 question but I believe the witness is competent to answer the  
10:53:39 25 question.

26 PRESIDING JUDGE: Ms Farrow, if you are able to this answer  
27 question we would like to hear what you have to say.

28 THE WITNESS: Your Honour, there are levels of discomfort  
29 and I don't doubt the strength of character and of Mrs Machel,

1 now Mrs Mandela. In a social setting giving a dinner party I got  
2 the impression that she did not want this particular guest to  
3 stay on to dinner, that he was not invited to dinner. That was  
4 the impression I got.

10:54:14

5 MR ANYAH:

6 Q. Ms Farrow, I want to show you one more document in  
7 connection with this issue. It's given to us by the Prosecution.  
8 This is in the Prosecution set of disclosures. It is in tab 2 of  
9 those documents. Yes, Ms Farrow, it is not in the tab of  
10 documents that you have but they will show you the document. Do  
11 you see the document, at the top of it it reads "The Blue Train",  
12 yes?

10:54:57

13 A. Yes.

14 Q. To the top right-hand corner is the logo of the Nelson  
15 Mandela Children's Fund, yes?

10:55:28

16 A. Yes.

17 Q. And you see at the top it says "Summary of Programme",  
18 correct?

19 A. Yes.

10:55:39

20 Q. You have Wednesday, 24 September 1997. It says, "Depart  
21 for South Africa." Then you have the 25 September 1997,  
22 Thursday. Let's look at the agenda for that date, 25 September.  
23 It says, "Arrive Johannesburg International Airport. Transfer  
24 to presidential guesthouse in Pretoria", and third and not least  
25 it says, "Private dinner with the President and his special  
26 guests."

10:56:14

27 See the reference there to "private" and see the reference  
28 "special guests." This was a dinner that was planned, persons  
29 were invited, persons that were special guests of the President.

1 When you read this, Ms Farrow, in your view would someone who was  
2 not invited be present at such a dinner?

3 A. It's possible.

4 Q. But you don't know?

10:56:59 5 A. I don't know.

6 Q. Thank you. Thank you Madam Court Usher. Now, Carole  
7 White --

8 MR KOUMJIAN: Excuse me. I know it's counsel's examination  
9 but could the Blue Train summary of programme be marked for  
10:57:20 10 identification?

11 MR ANYAH: I have no difficulty with that, Madam President.  
12 Thank you, counsel.

13 PRESIDING JUDGE: Mr Anyah, whilst we are marking the  
14 documents that you have referred to, what do I do with the  
10:57:31 15 photographs - the photograph at tab 5 - the various photographs  
16 at tab 5?

17 MR ANYAH: Madam President, the ones that were shown to the  
18 witness, more specifically the last two photographs in tab 5 -  
19 sorry, the second to last photographs in tab 5, the photograph  
10:57:56 20 depicting President Taylor with President Mandela with a caption  
21 beneath it, and the blow-up of that same photograph showing the  
22 same two Presidents, I would ask that those three photographs be  
23 marked for identification, please, and they could be given the  
24 same MFI number.

10:58:34 25 PRESIDING JUDGE: Firstly the photograph showing the  
26 witness Mia Farrow, President Nelson Mandela and others, with a  
27 caption "1998, Naomi Campbell went back to South Africa with Mia  
28 Farrow", et cetera, that photograph is marked - sorry, I think I  
29 already marked that one.

1 MR ANYAH: MFI-12.

2 PRESIDING JUDGE: MFI-12. And the next photograph, you  
3 see, this is what happens when you don't --

10:59:16

4 MR ANYAH: Madam President, it is the second from the  
5 first. It is the second photograph in tab 5.

10:59:52

6 PRESIDING JUDGE: Right. The photograph depicting Nelson  
7 Mandela with Charles Taylor with a caption that these two  
8 addressed the media at the State House residence of Nelson  
9 Mandela, September 25, 1997, that is marked MFI-13A. The blown  
10 out version of the same photograph is marked MFI-13B. Which is  
11 the third photograph?

12 MR ANYAH: That's it. All that remains is the programme  
13 for the Blue Train.

11:00:18

14 PRESIDING JUDGE: The programme of the Blue Train is marked  
15 MFI-14.

16 MR ANYAH: Thank you, Madam President. Madam President, I  
17 see that it is almost 11. Do you wish for me to complete this  
18 session with questions, because I have a new area to go into?

11:00:40

19 PRESIDING JUDGE: I think we will have our normal  
20 midmorning break, it is half an hour's break, and we will  
21 reconvene at half past 11.

22 [Break taken at 11.01 a.m.]

23 [Upon resuming at 11.30 a.m.]

24 PRESIDING JUDGE: Yes, Mr Anyah, please continue.

11:29:59

25 MR ANYAH: Thank you, Madam President.

26 Q. Good morning, Ms Farrow.

27 A. Good morning.

28 Q. Before the Court adjourned for the break, it occurs to me  
29 that I did not tie up a particular issue, and that issue has to



1 do with the question whether you have had additional contacts  
2 with Naomi Campbell since 1998. You remember we looked at the  
3 photograph with yourself, Kate Moss, Christy Turlington and  
4 others.

11:30:33 5 Now, earlier this morning, you said that Naomi Campbell  
6 contacted you so that you could be interviewed on her behalf by a  
7 big magazine. Do you remember telling us that this morning?  
8 A. Yes. On her behalf? Yes, if I would contribute, give my  
9 opinions to an article being done about her.

11:30:58 10 Q. Exactly.

11 A. Yes.

12 Q. It was not an interview about you, it was an interview  
13 about her?

14 A. Yes.

11:31:04 15 Q. And she wanted you to contribute on her behalf?

16 A. Correct.

17 Q. To this that article. Yes. Do you remember what year it  
18 was that Naomi Campbell contacted you?

19 A. I was afraid you were going to ask that. No.

11:31:15 20 Q. Your memory fails you in that regard, yes?

21 A. Dates.

22 Q. Yes. Now, are you aware that Naomi Campbell testified on  
23 Thursday that you have attempted to contact her recently? Are  
24 you aware of that?

11:31:32 25 A. Yes.

26 Q. How did you become aware of that?

27 A. Because I - I know that I - I mean, I did try to contact  
28 her.

29 Q. When did you try to contact Naomi Campbell?

1 A. After I was approached by the Prosecution, and when - it  
2 was my understanding that she was not reachable to the  
3 Prosecution, and so I thought I would give her a call and just  
4 see if she understood how important it was that she participate  
11:32:03 5 in these proceedings. So I had lost contact with her, so I,  
6 through my manager, sent my contacts to her manager, but I didn't  
7 - I didn't hear from her.  
8 Q. When were you first contacted by the Prosecution about  
9 these matters?  
11:32:24 10 A. That is written down somewhere.  
11 Q. August 10 when you received the email?  
12 A. Okay.  
13 Q. From Mr Koumjian?  
14 A. Correct.  
11:32:35 15 Q. 2009?  
16 A. Correct.  
17 Q. And is it after that that you sought to contact  
18 Ms Campbell?  
19 A. At some point after that.  
11:32:43 20 Q. You made reference to the fact that - and I don't want to  
21 misquote your words - you said, "So I thought I would give her a  
22 call and just see if she understood how important it was that she  
23 participate in these proceedings." You just said that, yes?  
24 A. Yes.  
11:33:03 25 Q. In your view, this is a very important proceeding, correct?  
26 A. Correct.  
27 Q. In your view, it is important that everyone who has  
28 information about these proceedings come forward and participate,  
29 correct?

1 A. Correct.

2 Q. You sought to contact Ms Campbell because you wanted to  
3 encourage her to come and participate as a witness in this case?

4 A. Correct.

11:33:31 5 Q. Indeed, you wanted her to cooperate with the Prosecution in  
6 this case, yes?

7 A. Correct.

8 Q. Yes. Now, if the Prosecution contacted you on 10 August  
9 2009, why is it that your declaration was not made until the 19th  
11:33:57 10 or the 9th of November 2009?

11 A. Well, they contacted me, and then at some point after that  
12 I gave a verbal declaration, on the phone; then they sent me a  
13 transcript of that, and it was some time before I could actually  
14 get a signed version that would be legally acceptable to them, so  
11:34:24 15 it was just a logistical problem.

16 Q. Yes. We will come back to that whole interaction with the  
17 Prosecution and how it came to be that you gave that declaration,  
18 we will revisit that in a few minutes but let me proceed.

19 Now, regarding Carole White, I want to be clear on this:  
11:34:43 20 Was Carole White present at breakfast when you were there with  
21 your children, Matthew, Malone and Ronan?

22 A. I don't remember.

23 Q. Have you seen Carole White since September 1997?

24 A. Not to my knowledge.

11:35:03 25 Q. When you were in South Africa in September, after the  
26 dinner, on the following day, did you travel on the Blue Train  
27 from Johannesburg to Cape Town?

28 A. I did.

29 Q. President Mandela was on that train?

- 1 A. He was.
- 2 Q. There were other dignitaries on that train?
- 3 A. Yes.
- 4 Q. Naomi Campbell was on that train?
- 11:35:25 5 A. Yes.
- 6 Q. Carole White, was she on that train?
- 7 A. I don't know.
- 8 Q. Bishop Desmond Tutu was on that train?
- 9 A. Correct.
- 11:35:34 10 Q. You did not speak with Carole White when you travelled on  
11 the Blue Train from Johannesburg to Cape Town?
- 12 A. I don't know if she was on the train, but I - there was no  
13 conversation of consequence, I can say that, if she was on the  
14 train.
- 11:35:54 15 Q. When you say there was no conversation of consequence, are  
16 you suggesting that it is possible the two of you spoke on that  
17 train but you just don't remember?
- 18 A. I'm saying, sir, if she was on the train, I would have  
19 exchanged pleasantries if she was on the train; anyone on the  
11:36:12 20 train I would have said good morning, if she was on the train.
- 21 Q. Was Jeremy Ractliffe on that train?
- 22 A. I don't know.
- 23 Q. You don't remember?
- 24 A. I don't remember.
- 11:36:26 25 Q. Very well.
- 26 A. That's likely.
- 27 Q. It's likely that he was on the train but you don't  
28 remember?
- 29 A. I don't remember.

1 Q. You remember this morning counsel opposite read you  
2 passages from Ms Campbell's testimony last week?

3 A. Yes.

4 Q. Now, you also have said, in court today, and in your  
11:36:49 5 declaration to the Prosecution, that Ms Campbell said she would  
6 be donating the diamond to the Nelson Mandela Children's Fund,  
7 correct?

8 A. In so many words.

9 Q. Yes. Ms Campbell, when she testified, and as was read to  
11:37:06 10 you this morning, said she never had a discussion with you at  
11 breakfast regarding what she was going to do with the diamond.  
12 Are you aware of that?

13 A. I would agree that there was no discussion, but in the  
14 torrent of words when she arrived, before she even sat down,  
11:37:27 15 telling me, us, about the diamond, she said, "Of course I'm not  
16 keeping it. Of course I'll give it to Madiba's children  
17 charity." It was not a discussion.

18 Q. Yes. Let's not refer to it as a discussion. Let's focus  
19 on whether or not she uttered those words?

11:37:45 20 A. Yes.

21 Q. Ms Campbell said she did not disclose to those present at  
22 the breakfast her intentions of what she was going to do with the  
23 diamond. Are you aware of that?

24 A. No.

11:37:59 25 Q. Now, Ms White, Carole White, who claims to have been  
26 present at the breakfast, Ms Carole White spoke with the  
27 Prosecution, we now know twice, on 13 May this year, and again  
28 yesterday, 8 August. Ms Carole White, in her declaration - and  
29 may I ask that this be shown to Ms Farrow, just to be fair to

1 Ms Farrow. We have this in the set of documents we provided.

2 It's behind divider 11, the document behind divider 11. I would  
3 start at page number 3.

4 PRESIDING JUDGE: Mr Anyah, you've referred to it as a  
11:39:11 5 declaration.

6 MR ANYAH: It's an interview note.

7 PRESIDING JUDGE: It's not a signed declaration.

8 MR ANYAH: No, it is not.

9 THE WITNESS: Can you tell me where I'm supposed to be  
11:39:21 10 reading?

11 MR ANYAH:

12 Q. Ms Farrow, to draw your attention to the relevant bit,  
13 could you look at paragraph 18 and 14, please?

14 A. 18 before 14?

11:39:35 15 Q. No, 13?

16 A. Oh, 13.

17 Q. And 14. Have you read it?

18 A. 14, no. I've read it.

19 Q. Let me read it to you and ask you a few questions.

11:40:08 20 Paragraph 13, it reads - these are interview notes given to us by  
21 the Prosecution documenting what Carole White said:

22 "The witness does not recall if Ms Campbell told anyone in  
23 the guesthouse about the diamonds but, knowing Ms Campbell, she  
24 feels it unlikely she would have kept it to herself. However,  
11:40:34 25 the witness thinks it very unlikely Ms Campbell would have told  
26 Graca Machel, as it was clear Ms Machel did not have a high  
27 opinion of Mr Taylor."

28 Paragraph 14:

29 "The next morning, the witness and Ms Campbell and others

1 boarded the Blue Train. The witness knew they had the diamonds  
2 and she figured that they would probably - and she figured that  
3 she would probably be the one who would wound up holding them and  
4 carrying them. She told Ms Campbell that she didn't think they  
11:41:24 5 should keep the diamonds, it could result in a scandal or even  
6 prison. The witness and Ms Campbell discussed the matter and  
7 decided to give the diamonds to Mr Mandela's charity because  
8 maybe they could do some good."

9 You heard what I read?

11:41:47 10 A. Yes.

11 Q. Ms White is saying that on the following day, while on the  
12 Blue Train, she told Ms Campbell she didn't think they should  
13 keep the diamonds. She said the two of them, Ms White and  
14 Ms Campbell, discussed the matter and they decided to give it to  
11:42:11 15 Mr Mandela's charity. What I've read, it suggests, does it not,  
16 that the discussion about what to do with the diamond, the  
17 decision about what to do with the diamond, was made on the Blue  
18 Train, true?

19 A. Apparently so.

11:42:31 20 Q. Is that a yes, that this suggests that Carole White and  
21 Naomi Campbell made the decision about what to do with the  
22 diamond while on the Blue Train?

23 A. I guess so, and I think it was that same day we went on the  
24 Blue Train actually.

11:42:44 25 Q. Yes?

26 MR KOU MJIAN: My objection is that counsel is asking this  
27 witness to interpret what another witness meant with their words,  
28 and that's improper.

29 PRESIDING JUDGE: No, Mr Koumjian, the suggestion is for

1 Ms Farrow to agree or disagree with the excerpt of another  
2 prospective witness. It is perfectly allowable. And, of course,  
3 she has answered.

4 THE WITNESS: May I say, sir?

11:43:11 5 MR ANYAH: Yes, thank you, Madam President.

6 Q. Yes, Ms Farrow, please?

7 A. May I say, sir?

8 Q. Yes?

9 A. I can't speak about what future conversations or  
11:43:18 10 deliberations Ms Campbell had about what to do with the diamonds.  
11 I'm just saying what she said that morning.

12 Q. We appreciate that, but do you appreciate that on the basis  
13 of what Carole White has said, it appears that --

14 A. That there was a consequential --

11:43:35 15 Q. -- the issue of what to do with the diamond was discussed  
16 on the Blue Train?

17 A. Yes.

18 Q. You agree with that?

19 A. I agree with that.

11:43:41 20 Q. And it is a fact, is it not, that the Blue Train ride  
21 occurred the morning after the evening of the 25th of September  
22 when you had the dinner?

23 A. Correct, I believe so.

24 Q. It is a fact that the ride on the Blue Train, the boarding  
11:43:58 25 of the train, the progression of the train from Johannesburg to  
26 Cape Town, occurred after the breakfast you had with your  
27 children and Naomi Campbell, true?

28 A. True.

29 Q. Thank you. Thank you, Madam Court Usher.



1 MR KOUMJIAN: Excuse me. Counsel did, in an earlier  
2 question, preface it by saying Carole White claimed that she was  
3 at the breakfast. That wasn't in the portion read by counsel and  
4 I don't believe it's in any statement.

11:44:28 5 MR ANYAH: Well, if it please your Honours, we have the  
6 statement in front of us. Let us consider that Carole White said  
7 she was at the breakfast, because I will be happy to put that on  
8 the record. Indeed, I will respectfully ask that this statement  
9 be marked for identification ultimately.

11:44:45 10 Q. But, Ms Farrow, just so you know, since you have said you  
11 cannot remember whether Ms White was at the breakfast, let me  
12 read to you about Ms White's comments that she was at the  
13 breakfast, okay?

14 A. Okay.

11:45:00 15 MR ANYAH: Now, Madam President, I cannot find the  
16 reference, and I'm trying to look at the disclosure given to us  
17 today by the Prosecution regarding what Ms White said yesterday.  
18 If the suggestion by counsel is that there is no evidence of  
19 record --

11:45:43 20 PRESIDING JUDGE: Ms White said yesterday?

21 MR ANYAH: Sorry, Ms White met with the Prosecution  
22 yesterday, on Sunday, and we were disclosed information about  
23 that at 8 p.m. yesterday, and that is what I'm trying to look  
24 through. I won't hold up the proceedings. If counsel's  
11:46:00 25 suggestion is that there is no evidence of record by Ms White  
26 that she was at the breakfast, then that portion of the record  
27 could be withdrawn. But I would like to proceed with the witness  
28 and not spend time on this.

29 PRESIDING JUDGE: In any event, Mr Anyah, you do have a

1 team - a formidable team behind you that could assist.

2 MR ANYAH: I will ask somebody to look into that for me.

3 Q. Now, Ms Farrow, you were asked by Justice Lussick this  
4 morning about your knowledge of Charles Taylor before you met him  
11:46:33 5 at Mr Mandela's house, you recall that?

6 A. Yes.

7 Q. Did you know Charles Taylor before that day?

8 A. No.

9 Q. You knew of the country Liberia, yes?

11:46:43 10 A. Yes.

11 Q. Yes. You knew that he was an African Head of State, yes?

12 A. Yes. He was introduced to me as the President of Liberia.

13 Q. Were you aware at that time, September 1997, that Liberia  
14 produced diamonds?

11:47:02 15 A. No.

16 Q. Were you aware in September 1997 that there was a civil war  
17 going on in Sierra Leone?

18 A. I'm ashamed to say that in 1997 I knew very little about  
19 Africa and African affairs. I don't think I did know.

11:47:27 20 Q. As of September 1997, you knew the difference between  
21 processed diamonds versus uncut or rough diamonds, is that fair  
22 to say?

23 A. Only in the words. I've never seen an uncut diamond.

24 Q. Now, when Ms Campbell testified on Thursday, Ms Campbell  
11:47:51 25 said she had never heard of the country Liberia, she didn't know  
26 who Charles Taylor was, she only heard the terms "blood diamonds"  
27 in the year 2003. She said, when she sees a diamond she is used  
28 to seeing it shiny and in a box. That's what Ms Campbell said.  
29 Are you aware of that?

1 A. Yes.

2 Q. Now, this is important for a simple reason. You say it was  
3 Ms Campbell who said they were diamonds, that it was a diamond,  
4 and that it came from Charles Taylor. Ms Campbell said that it  
11:48:38 5 was you or Carole White at breakfast who made two suggestions,  
6 the first suggestion being, "Well, that's obviously Charles  
7 Taylor", that is the person who sent the diamonds; the second  
8 suggestion being, "Well, they are obviously diamonds."

9 Now, one of you must not be telling the truth. You follow  
11:49:06 10 me?

11 A. Yes.

12 Q. Is it Ms Campbell, who didn't even know about Liberia,  
13 didn't know about diamonds that were not shiny and in a box,  
14 didn't know Charles Taylor, or is it you, Ms Farrow? Is it  
11:49:32 15 possible that, while you're trying to help the Court, your  
16 recollection might be failing you as to who said that it was a  
17 diamond and that it was from Charles Taylor? Is it possible?

18 A. It is not possible, sir.

19 Q. Is it possible that someone else there present made those  
11:49:53 20 remarks and you just, in your mind's eye, believe it was Naomi  
21 Campbell who said them?

22 A. It was Naomi Campbell who said them.

23 Q. Charles Taylor did not stay at the guesthouse where you and  
24 the others resided, correct?

11:50:12 25 A. I don't know.

26 Q. Well, Naomi Campbell said he didn't stay there?

27 A. She would know perhaps. I - I don't know.

28 Q. Did you see him at breakfast the next morning?

29 A. No.

1 Q. Did you see him at any time after the dinner?

2 A. No.

3 Q. In fact, you don't recall seeing him at the dinner?

4 A. No.

11:50:30 5 Q. Yes. You don't recall if he came alone or with someone  
6 else?

7 A. There were others, when I arrived at the residence of  
8 President Mandela, he was not alone.

9 Q. Who was not alone?

11:50:42 10 A. Charles Taylor.

11 Q. The man or others that were with Charles Taylor, did you  
12 see them at any point in time on the premises of the guesthouse  
13 after the dinner?

14 A. No.

11:50:53 15 Q. That guesthouse was the presidential guesthouse in  
16 Pretoria, true?

17 A. Correct.

18 Q. The guesthouse belonging to Nelson Mandela, yes?

19 A. I don't know that.

11:51:02 20 Q. Well, it was the guesthouse for the use of the President of  
21 South Africa?

22 A. I assume so.

23 Q. That guesthouse was protected by security officers,  
24 correct?

11:51:13 25 A. I don't know.

26 Q. Well, is it possible or is it the case that there were  
27 dressed uniformed guards at that guesthouse when you were there?

28 A. I don't recall uniformed guards.

29 Q. Carole White, when she spoke with the Prosecution on 13 May

1 this year, told the Prosecution that there were guards in dress  
2 uniform during the day at the guesthouse. Are you aware of that?

3 A. No.

4 Q. Would you like me to show you her statement or do you take  
11:51:47 5 my word for it?

6 A. I take your word for it.

7 Q. So we have Carole White saying there were guards in dress  
8 uniform and you do not recall whether or not there were guards,  
9 is that your evidence?

11:51:57 10 A. That's mine, yes.

11 Q. Are you aware that South Africa is one of the largest  
12 producers of diamonds in the world?

13 A. I am now.

14 Q. Are you saying that you were not aware of that in 1997?

11:52:08 15 A. Probably not. I don't - I had given no thought to  
16 diamonds.

17 Q. Well, Ms Farrow, you are a world-renowned actress, yes?

18 A. Yes.

19 Q. You have won several awards for your acting and movie  
11:52:33 20 participation, yes?

21 A. Yes.

22 Q. You have travelled the world?

23 A. Yes.

24 Q. Africa and other places, many times, yes?

11:52:41 25 A. Yes.

26 Q. Yes. You are an enlightened person, is that fair to say?

27 A. I'm working on it.

28 Q. You have told The Guardian newspaper in the UK, that one of  
29 your extravagances is books. You like books, you read a lot,

1 correct?

2 A. Yes, sir.

3 Q. You read about world affairs?

4 A. Yes, sir.

11:53:06 5 Q. Yes? You have told ABC News that when these events  
6 happened you said, "Wow, what an amazing life Naomi Campbell must  
7 have. Men must be giving her diamonds all the time." You  
8 remember saying that?

9 A. It crossed my mind.

11:53:22 10 Q. Naomi Campbell is a supermodel, as they call them?

11 A. Yes.

12 Q. You being a celebrity, you know that people send gifts to  
13 celebrities at all times, yes?

14 A. I would say her case would be extreme.

11:53:38 15 Q. Well, listen to my question. In your experience as a  
16 celebrity, which you are --

17 A. Mm-hm.

18 Q. -- is it the case that celebrities do receive gifts from  
19 people they do not know?

11:53:52 20 A. It is, absolutely.

21 Q. In the particular case of a fashion model, in your  
22 experience, have you heard accounts of fashion models receiving  
23 expensive gifts?

24 A. No, but I'm sure they do and now there is this, yes.

11:54:12 25 Q. Yes. And often times from people the celebrity does not  
26 know, yes?

27 A. Sometimes.

28 Q. You also receive letters from fans?

29 A. True.

1 Q. Correct? And so does celebrity models, yes?

2 A. I'm sure.

3 Q. And so here we are in South Africa in the middle of the  
4 night, there is a supermodel in town, in a country that produces  
11:54:35 5 diamonds, and somebody sends her a gift. Now, is it possible -  
6 as you sit there now, would you agree that it is possible that  
7 that gift could have come from anyone else in South Africa  
8 besides Charles Taylor?

9 A. But for the fact that she said it was sent from Charles  
11:55:05 10 Taylor.

11 Q. There remains the possibility, if you misheard what she  
12 said, that it came from someone else, would you agree?

13 A. No. I didn't mishear.

14 Q. When I have read to you indications from others that there  
11:55:25 15 was more than one diamond and you continue to maintain that there  
16 was one diamond, do you still stand by the fact?

17 JUDGE DOHERTY: Mr Anyah, the witness said that she was  
18 told a diamond. Not that she said the word "diamond".

19 MR ANYAH: I understand the distinction. The witness has  
11:55:45 20 said she recalls hearing that it was a diamond.

21 THE WITNESS: That's all I heard.

22 MR ANYAH:

23 Q. Yes.

24 A. There could have been dozens. I don't know how many  
11:55:52 25 diamonds there were or what state they were in because I didn't  
26 see them. I can only tell you, and I swear on the Bible as I  
27 have to this Court and beyond, those - that is what Naomi  
28 Campbell said that morning at breakfast.

29 Q. That is your recollection of what Naomi Campbell said?

1 A. That is my best recollection.

2 Q. Yes. But having been confronted with the recollection of  
3 others, do you stand by your recollection?

11:56:26

4 A. I stand by my recollection of what she said. Others saw  
5 the diamond or diamonds, I did not.

6 Q. Very well. Have you told anyone since September 1997 until  
7 the time you were contacted by the Prosecution, about these  
8 events?

11:56:54

9 A. I don't know. Nothing stands in my mind. I - honestly,  
10 I have forgotten.

11 Q. So you do not know whether in the 12 year period between  
12 September 1997 and when Mr Koumjian contacted you on 10 August  
13 199 - on 10 August 2009, you had mentioned this incident to  
14 anyone?

11:57:10

15 A. I might have.

16 Q. But you do not remember whom?

17 A. No, I don't.

18 Q. And you do not remember when?

11:57:22

19 A. I don't. I might have on several occasions or maybe not at  
20 all. Nothing comes to mind.

21 Q. Well, in that 12 year period of time, is it fair to say  
22 that you began to know more about Africa?

23 A. Yes.

11:57:41

24 Q. You wrote an autobiography in that same year, 1997,  
25 correct?

26 A. Correct.

27 Q. In the autobiography the title is "What Falls Away"?

28 A. Yes.

29 Q. Yes. Page 57, you said that you would have liked to be a



1 paediatrician working in Africa, yes?

2 A. Yes.

3 MR ANYAH: Madam President, incidentally, we do have copies  
4 of the autobiography in our binder, they appear behind divider 9,  
11:58:10 5 and I have the autobiography here if anybody needs it.

6 Q. Now, you said in your autobiography that you would have  
7 liked to be a paediatrician working in Africa, yes?

8 A. Yes.

9 Q. At other times when you have been interviewed you have  
11:58:27 10 repeated something similar about if you had to do things all over  
11 again you would have liked to work in Africa, correct?

12 A. Correct.

13 Q. Yes. Now, at some point in time, between 1997 and now, you  
14 knew of the civil conflict in Sierra Leone, correct?

11:58:47 15 A. Correct.

16 Q. On 29 March 2006, Charles Taylor was arrested in Nigeria,  
17 handed over to the Special Court of Sierra Leone. Did you hear  
18 about that or read about it?

19 A. I did.

11:59:04 20 Q. You read that he was arrested in connection with events  
21 that happened during the civil war in Sierra Leone?

22 A. Correct.

23 Q. Yes. Now, you also knew that Charles Taylor was the ruler  
24 of the neighbouring country, Liberia, yes?

11:59:24 25 A. Yes.

26 Q. And that Liberia itself had at some point during the 1990s  
27 had a civil war, yes?

28 A. Yes.

29 Q. Do you know, as you sit there now, that one of the charges

1 against Charles Taylor, it's count 9 of the indictment, has to do  
2 with the issue of child soldiers? Do you know that?

3 A. Yes.

4 Q. In your work as a UN goodwill ambassador - which you  
11:59:57 5 assumed in September 2000, yes?

6 A. Again, a date, I can't swear to the date but I am that.

7 Q. Yes. And I'm saying to you it was in September 2007.

8 A. Okay.

9 Q. Sorry, September 2000.

12:00:13 10 A. Okay.

11 Q. Your focus - or your special focus as a UNICEF ambassador  
12 is on children impacted by armed conflict?

13 A. Yes.

14 MR ANYAH: Madam Court Officer, can we go to tab 3 in the  
12:00:31 15 Defence bundle and just look at some of Ms Farrow's work with  
16 UNICEF. It's behind divider number 3 of the Defence bundle, your  
17 Honours.

18 Q. Ms Farrow, this is taken from UNICEF's website, and I'll  
19 just read bits of it. At the top you see UNICEF people,

12:01:04 20 Mia Farrow, goodwill ambassador. It says:

21 "Mia Farrow, internationally acclaimed actress and  
22 humanitarian activist, was appointed UNICEF goodwill ambassador  
23 in September 2000. As a powerful advocate for children, she  
24 campaigns tirelessly for their rights around the world with a  
12:01:28 25 special focus on children impacted by armed conflict."

26 Ms Farrow, you see the indication that your appointment was  
27 in September 2000?

28 A. Yes, sir.

29 Q. So it says:

1 "Ms Farrow has worked extensively to raise funds and  
2 awareness for children whose lives have been affected by violence  
3 in countries such as Angola, Chad, Central Africa Republic,  
4 Democratic Republic of the Congo, Haiti and Nigeria. Along with  
12:02:05 5 her son, Ronan, a UNICEF spokesperson for youth, she has visited  
6 Darfur, Sudan, several times to highlight the devastating impact  
7 of continued violence on women and children."

8 Then we go to the next page. And UNICEF on that page  
9 highlights some of your activities. And it starts with July  
12:02:38 10 2010, which is just last month.

11 "UNICEF indicates that Mia Farrow travelled to Uganda to  
12 meet with children impacted by years of conflict and participated  
13 in the first-ever African youth forum."

14 You did go to Uganda, Ms Farrow?

12:02:57 15 A. Yes.

16 Q. And we see the listing. You will notice that in the list  
17 of countries I read on the previous page, except for Haiti, all  
18 of the other countries mentioned are in the African continent,  
19 yes?

12:03:09 20 A. Yes.

21 Q. And when we look at the places you visited, going back to  
22 2001, because on the next page it goes as far as 2001, the last  
23 ten years, all of the countries visited, except for the October  
24 visit in 2009 where you visited the Palestinian territory and  
12:03:33 25 Israel, and then in 2008 September you visited Haiti, all of the  
26 rest of the countries you visited are in Africa, is that  
27 accurate?

28 A. Yes.

29 Q. Africa is a continent you hold passionately in your heart,

1 correct?

2 A. Indeed.

3 Q. Yes. Now, you being a well-read person, you being a  
4 humanitarian activist, Africa being your focus of interest or one  
12:04:06 5 of the continents that interest you, you being aware of the fact  
6 that Charles Taylor was being tried by the Special Court for  
7 charges including the use of child soldiers, did it occur to you  
8 at any time to contact the Office of the Prosecutor before August  
9 2009, when Mr Koumjian emailed you, to tell them about what you  
12:04:32 10 know?

11 A. No, sir. It didn't. My focus was very, very intensely  
12 Sudan oriented, Chad, Central Africa Republic, that area was my -  
13 and continues to be an area of primary focus and I'm now working  
14 to document the songs, dances, children's stories and so forth of  
12:04:58 15 the refugees in Chad from Darfur. So I was peripherally aware.  
16 And I'm gratified to see that Mr Taylor had been apprehended and  
17 I knew in Nigeria and that these proceedings were ongoing.  
18 I never supposed, and indeed when the Prosecution contacted me,  
19 I first said, "I don't think I have anything of consequence to  
12:05:22 20 offer you, to say." And he said, "Well, just tell me anything  
21 that you can remember regarding Charles Taylor." I didn't know  
22 that this incident would be so consequential. He even said to  
23 me, "I can't tell you why it's so consequential, but it is of  
24 consequence to us."

12:05:43 25 Q. Ms Farrow, I appreciate your response but let's consider  
26 some of what you said. You said you didn't - you said your focus  
27 very intensely was on Sudan oriented areas, Chad, the Central  
28 Africa Republic?

29 A. Mm-hm.

1 Q. But it is the case that you have narrated a DVD  
2 documentary?

3 A. Yes.

4 Q. About the Rwandan genocide, "As We Forgive"?

12:06:10 5 A. Yes.

6 Q. This was done in which year?

7 A. Perhaps you could tell me.

8 Q. Perhaps 2009, last year?

9 A. I don't know. It seems earlier than that but okay.

12:06:21 10 Q. Very well. But the point is your interest also extends to  
11 the Rwandan genocide, correct?

12 A. Yes, that changed my life, absolutely.

13 Q. Yes. And --

14 A. I've been there twice.

12:06:33 15 Q. And you have made public statements about ridding Africa of  
16 impunity everywhere, not limiting them only to the Darfur and  
17 Chadian regions, haven't you?

18 A. I'm sorry, would you rephrase that or repeat that.

19 Q. Yes. I'm saying to you that you have made public  
12:06:54 20 statements about ridding Africa of impunity, wherever it may be,  
21 correct?

22 A. Wherever it may be, yes.

23 Q. Yes. Now, I go back to my original inquiry: For 13 years  
24 or thereabouts you had this information and you kept it to  
12:07:14 25 yourself. Do you regret that, Ms Farrow?

26 A. I can't. I didn't realise it was consequential.

27 Q. You did not realise that?

28 A. I didn't realise it and I just - honestly, sir, I had  
29 forgot about it until it was Nick, the telephone call, he said,

1 "Tell me anything you remember." And it was really Mrs Machel's  
2 reaction at that dinner party and Naomi Campbell's statement in  
3 the morning. I didn't - yes, I regret that I didn't put it  
4 together earlier, I suppose, but anyway that's when I remembered  
12:08:00 5 it.

6 Q. Well, a few minutes ago, while responding to my questions,  
7 you used the phrase - you said you were gratified that Charles  
8 Taylor had been arrested. Did you just say that, that you were  
9 gratified?

12:08:16 10 A. If indeed - if indeed he's guilty of the crimes he's  
11 accused of, I am gratified that he is - he is in this procedure -  
12 involved in a procedure that would bring him to justice. I have  
13 confidence that the proceedings will reveal whether he is guilty  
14 or not.

12:08:40 15 Q. When Mr Koumjian contacted you, and when you signed your  
16 declaration, the first paragraph of your declaration, you said  
17 you were, "Happy to relate what you remembered to Mr Koumjian."  
18 Do you remember that the word "happy" appears in your  
19 declaration? Would you like to see your declaration?

12:09:04 20 A. No, but I don't doubt it. Yes, I'm happy to provide  
21 evidence. I'm happy to come here and be of help.

22 MR ANYAH: Madam President, the declaration is behind  
23 divider 10 in our bundle.

24 Q. So we have you saying in court that you were gratified that  
12:09:23 25 if Mr Taylor is indeed responsible, that he's now in the dock.  
26 We have you saying in your declaration that --

27 A. May I see my declaration? Thank you.

28 Q. Yes. You could look at your declaration. And I'll call  
29 your attention to the relevant paragraph. Paragraph 1, last

1 sentence, this is recalling your conversation with Mr Koumjian:

2 "He then asked what I recalled about that meeting, and  
3 I explained that I had limited contact with Mr Taylor, but was  
4 happy to relate what I remembered."

12:10:05 5 You used that word "happy", yes?

6 A. I think more as a figure of speech. I am willing and  
7 pleased to offer whatever I can. I don't mean in the sense of  
8 elated, joyous, any of those things. It's a figure of speech.  
9 I'm happy to oblige, you know.

12:10:29 10 Q. You say it is a figure of speech. Let's consider another  
11 account you gave to ABC News. You met with ABC News this year  
12 regarding these events, correct?

13 A. Yes.

14 Q. Did you meet with a fellow named Brian Ross?

12:10:46 15 A. He was on the telephone. I did an interview with him. His  
16 cameras were at my house and I was on the phone with him.

17 Q. Very well. And that interview was broadcast on ABC News on  
18 22 April 2010. They broadcast it during World News Tonight with,  
19 I believe, Diane Sawyer. Later in the evening on that day it was  
12:11:15 20 repeated on Nightline and I'm going to repeat for you some of  
21 what you said and then we will watch the broadcast. During that  
22 broadcast, here is what you said. This was in relation to Naomi  
23 Campbell's refusal to cooperate with the Prosecution. They have  
24 you saying, one:

12:11:34 25 "Step up. Do your part. I am eager to see the people of  
26 Liberia and Sierra Leone see justice. They need that. They  
27 deserve it."

28 Did you say those words?

29 A. Yes.

1 MR ANYAH: Madam Court Manager, may we play the video? The  
2 title of the video is "ABC News, Brian Ross". Thank you.

3 [Video clip played to the Court]

4 Q. Ms Farrow --

12:18:41 5 A. Yes, sir.

6 Q. -- you listened to the last bit of that clip, correct?

7 A. Yes, correct.

8 Q. Before the clip was played I suggested you said words to  
9 the effect, "They deserve that." To be fair to you, you did not  
10 say that, yes?

12:18:56

11 A. The people of Sierra Leone deserve justice?

12 Q. Well, let me repeat myself. What you said on the clip was,  
13 "I am eager to see the people of Liberia and Sierra Leone see  
14 justice. They need that." Correct?

12:19:17

15 A. Correct.

16 Q. Yes. So we have you saying in court you were gratified to  
17 hear about Charles Taylor's arrest to the extent that he was  
18 responsible for the alleged crimes. We have you in your  
19 declaration to the Prosecution saying you were happy to relate  
20 what you remembered, yes?

12:19:35

21 A. Yes.

22 Q. We have you telling ABC News that you are eager to see the  
23 people of Liberia and Sierra Leone see justice, yes?

24 A. That is correct.

12:19:51

25 Q. You are eager. Are you aware that Charles Taylor does not  
26 stand charged of any offence involving Liberia? Are you aware of  
27 that?

28 A. No, okay.

29 Q. But you included Liberia in the context of Sierra Leone and



1 saying you were eager to have the peoples of both nations receive  
2 justice, correct?

3 A. Correct.

4 Q. Now, when you made those remarks, you made them because you  
12:20:22 5 believed that the people of Sierra Leone would get justice if  
6 Charles Taylor is convicted, correct?

7 A. If he is guilty.

8 Q. Yes. You believe that that would be justice for the people  
9 of Sierra Leone if he is guilty, yes?

12:20:37 10 A. Some measure, some measure of justice for them.

11 Q. Yes.

12 A. If the person who is guilty is sentenced, that is some  
13 measure. They can never be given everything back.

14 Q. And your inclusion of Liberia in your comments reflects  
12:20:59 15 also your belief that the citizens of Liberia would get justice  
16 if Charles Taylor is found guilty in this case, correct?

17 A. Perhaps I misspoke. I don't know that that's true.

18 Q. So now -

19 A. I assumed so.

12:21:15 20 Q. You assumed so. You thought he was also charged with  
21 events pertaining to Liberia?

22 A. Perhaps not charged with.

23 Q. You feel he was responsible for events that happened in  
24 Liberia?

12:21:26 25 A. I'm not qualified to say.

26 Q. Very well. As you sit there now, Ms Farrow, it is true  
27 that, in your view, Africa would be better off without the likes  
28 of Charles Taylor and Omar al-Bashir of Sudan, correct?

29 A. If Charles Taylor is guilty, certainly. Omar al-Bashir,

1 without question.

2 Q. You have referred to the Sudanese government as a genocidal  
3 government, correct?

4 A. Correct.

12:22:05 5 Q. You have gone on CBS News with Russ Mitchell and you have  
6 spoken about the Sudanese government and their actions in the  
7 Darfur region, correct?

8 A. Correct.

9 Q. You presently run a blog on the internet, mifarrow.org,  
12:22:23 10 correct?

11 A. Correct.

12 Q. And on that blog, you update on a daily basis events that  
13 you find significant that have happened in the world, correct?

14 A. Mostly restricted to those countries we mentioned,  
12:22:38 15 especially Sudan, Chad, Congo, Central African Republic.

16 Q. Yes, let's look at the blog. We have it, at least excerpts  
17 from it, in tab 7 in our set of documents. I just want to go  
18 over some of the sort of articles you've written about.

19 Ms Campbell - sorry, Ms Farrow, take your time, look  
12:23:22 20 through all the articles there.

21 A. All of them?

22 Q. Well, don't read all of them but just familiarise yourself  
23 with them. I will not be reading all of them, I will just be  
24 pointing out.

12:23:33 25 A. This first one, Wall Street Journal?

26 Q. Yes and the following ones, all in tab 7.

27 A. Some are written by me and some are post - all are posted  
28 by me. I don't know what you want me to focus on at this point.

29 Q. Okay, let me lead you through it. Madam Court Usher, may

1 we show the first document, page 1. Ms Farrow, this is taken  
2 from your blog at the bottom you will see it comes from  
3 miafarrow.org, but it is actually an editorial that you wrote for  
4 the Wall Street Journal, correct?

12:24:13 5 A. Correct.

6 Q. You wrote it on 25 May 2010, this year?

7 A. Correct.

8 Q. And after writing it for the Wall Street Journal, it  
9 appeared in the journal and you reproduced it on your blog. Is  
10 that fair to say?

12:24:28

11 A. Yes.

12 Q. Now, the title reads, "Obama ignores Sudan's genocide.  
13 "African hopes are fading as the US lets President Omar al-Bashir  
14 escape justice." These are your writings, Ms Farrow, correct?

12:24:50

15 A. Correct.

16 Q. Your name is written there, "By Mia Farrow". If we go to  
17 the second full paragraph, it reads:

18 "Mr Bashir is indicted by the International Criminal Court  
19 for war crimes and crimes against humanity, but the African Union  
20 panel on Darfur has clearly aligned itself with Khartoum."

12:25:11

21 Khartoum is the seat of Government of the Sudanese  
22 republic, yes?

23 A. Correct.

24 Q. Now, we go down a few paragraphs to the fifth paragraph,  
25 which reads:

12:25:31

26 "For seven years, the people of Darfur have been pleading  
27 for protection and for justice. They do not believe either peace  
28 or justice can come while Mr Bashir, orchestrator of their  
29 suffering, remains President of Sudan, nor do they believe

1 'locally owned accountability' is remotely possible under the  
2 current regime."

3 Next paragraph:

4 "When Barack Obama was elected President of the United  
12:26:08 5 States, hope abounded, even in Darfur's bleak refugee camps,  
6 Darfuris believed this son of Africa could understand their  
7 suffering and would end the violence that has taken so much from  
8 them and bring Mr Bashir to justice."

9 The next paragraph:

10 "I have held new babies named Obama and watched as Darfuris  
11 began to dream again."

12 And then you go on to give the account of what a 24  
13 year-old widow and mother told you. And if we go over to the  
14 next page, the last paragraph reads:

15 "It is time for us to step up and accept our moral  
16 obligation to protect a defenceless people. The American people  
17 should urge Mr Gration and the Obama administration to lead a  
18 diplomatic offensive to convince the world to isolate Omar  
19 al-Bashir as a fugitive from justice and to wholeheartedly  
12:27:27 20 support the only body offering Darfur's people a measure of  
21 authentic justice, the International Criminal Court."

22 And lastly underneath it says: "Ms Farrow has visited  
23 Darfur and eastern Chad 13 times since 2004."

24 That is correct, isn't it?

12:27:47 25 A. You just omitted one word, I said it is "past time".

26 Q. Yes. "It is past time for us to step up"?

27 A. Yes.

28 Q. Thank you for that observation. You see where it says that  
29 "the International Criminal Court", you refer to it as the only

1 body offering Darfur's people a measure of authentic justice. Do  
2 you really believe that?

3 A. Yes.

12:28:24

4 Q. You believe that the court, not far from this building, is  
5 the only body offering --

6 MR ANYAH: I see there is an objection. What is the  
7 objection?

8 PRESIDING JUDGE: Mr Koumjian?

12:28:37

9 MR KOUMJIAN: The relevance of this question. What the  
10 witness's opinion is of the International Criminal Court I don't  
11 think is relevant to these proceedings.

12 MR ANYAH: May I respond, Madam President?

13 PRESIDING JUDGE: Yes, Mr Anyah?

12:28:50

14 MR ANYAH: There are a number of points. First, this is  
15 cross-examination. The rules of this Court and its jurisprudence  
16 allow us to undertake a thorough and sifting examination.

12:29:10

17 The second point is that the International Criminal Court,  
18 and the manner in which it is spoken of here, if I'm allowed to  
19 pursue this question, would be tantamount to the witness's belief  
20 that the Prosecution of that organisation is the only vehicle for  
21 justice to Darfuris.

12:29:32

22 Thirdly, this is the witness's own writing. The writing  
23 affects a current African Head of State. The defendant sitting  
24 before your Honours is a former African Head of State. Questions  
25 I've asked of the witness leading up until this point have  
26 demonstrated her preoccupation with the African continent and,  
27 indeed, the plight of those suffering there. I think this is a  
28 fair question to put to the witness.

29 PRESIDING JUDGE: Mr Anyah, the --

1 JUDGE LUSSICK: Mr Anyah, what has all this got to do with  
2 what Naomi Campbell told the witness about the gift of diamonds?

3 MR ANYAH: It has to do, in the sense that the same  
4 witness, whose version of the events the Prosecution has adopted,  
12:30:14 5 has said publicly she is eager to see that the people of Liberia  
6 and Sierra Leone receive justice. That's what this case is  
7 about, she is eager to see that they receive justice. And it  
8 implicates her other feelings about Africa and the role of its  
9 leaders vis-a-vis the suffering of various civilian populations.

12:30:35 10 JUDGE LUSSICK: What are you implying, that there is  
11 something wrong in saying she is eager to see justice received?  
12 Would you be happier if she said she was reluctant to see justice  
13 received?

14 MR ANYAH: It is of consequence. I am not faulting the  
12:30:51 15 witness by any measure, but it is of consequence that those words  
16 are used and the sequence in which they are said.

17 The witness is quoted as saying to Ms Campbell, "Step up,  
18 do your part". And here again we see the phrase, "It is past  
19 time for us to step up", in relation to Darfur.

12:31:09 20 Given that this is cross-examination, given the scope and  
21 latitude that we are afforded in cross-examination, I propose,  
22 with respect, that I'm entitled to pursue these matters with the  
23 witness.

24 PRESIDING JUDGE: As Presiding Judge, I think I will rule  
12:31:23 25 on this issue.

26 My view is that the question is admissible in the way that  
27 it has been put. It is a question that relates to a document  
28 that the author - whose author is the witness in the box, and  
29 I certainly think it's relevant. The objection is overruled.

1 MR ANYAH: Thank you, Madam President.

2 Q. Let me repeat my question, Ms Farrow. My question appears  
3 at page 99 of the LiveNote transcript. And I said, "You see  
4 where it says that the International Criminal Court, you referred  
12:32:06 5 to it as the only body offering Darfuris a measure of authentic  
6 justice, do you really believe that?" And your response was  
7 "yes"?

8 A. Yes.

9 Q. And I was about to ask you another question when an  
10 objection was interposed, and the question was: You believe that  
11 the court not far from this building is the only body that can  
12 offer justice to the people of Darfur? Is that your opinion,  
13 Ms Farrow?

14 A. At this point, it is the only body offering any measure of  
12:32:41 15 real justice to the people of Darfur.

16 Q. Indeed, last year, 4 March 2009, after the International  
17 Criminal Court issued an arrest warrant for President Omar  
18 al-Bashir, in April, you attempted to fast with a water-only diet  
19 for three weeks to call attention to the Darfur situation,  
12:33:12 20 correct?

21 A. It was very specific. It was after the expulsion of half  
22 the humanitarian aid capacity to the refugees in Darfur. That  
23 left millions of people with insufficient water, food and medical  
24 supplies, and the UN had said that they couldn't fill the gap.  
12:33:36 25 I waited for my President and others to respond and, when that  
26 didn't happen, yes, I went on a fast to try to call attention to  
27 this outrageous expulsion of humanitarian aid agencies that were  
28 crucially needed in the region.

29 Q. Yes, indeed. The Government of Sudan, after the ICC's

1 arrest warrant, expelled 13 international agencies, correct?

2 A. Yes, and three national ones.

3 Q. Exactly. Three national agencies and 13 international ones  
4 and, as a consequence, on or about the 27th of April last year,

12:34:16 5 you undertook a three-week fast. Correct?

6 A. I didn't last three weeks.

7 Q. You lasted about 12 days?

8 A. The 13th day, I had to quit.

9 Q. Yes. But you felt it imperative to take action, yes?

12:34:35 10 A. Yes, I just couldn't sit by and watch.

11 Q. Now, may we see another video, please. This is a video  
12 titled, "Actress Mia Farrow calls for justice in Darfur."

13 PRESIDING JUDGE: Can I suggest that before the video is  
14 played, we have it on the overhead; sometimes we begin the  
15 narration and we are not seeing anything.

12:35:06

16 MS IRURA: Your Honour, we do not have a transcript of this  
17 particular video.

18 MR ANYAH: Madam President, may I also ask that the volume  
19 be raised a little bit? The last video that was played, the  
20 audio was not too voluble.

12:35:30

21 [Video clip played to the Court]

22 Q. Ms Farrow, did you hear yourself and the words you spoke on  
23 the video?

24 A. Yes, sir.

12:39:42

25 Q. You spoke about the need to support the International  
26 Criminal Court because unless you do so, every thug who finds his  
27 way into government could carry out acts of impunity, yes?

28 A. I don't know if that's the exact quote.

29 Q. But something to that effect, that the International



1 Criminal Court should be supported, correct?

2 A. I believe that.

3 Q. And you spoke of thugs who find their way into government,  
4 correct?

12:40:11 5 A. Yes, who hack their way to power, I think.

6 Q. Exactly. And this was in the context of the Darfur crisis,  
7 correct?

8 A. Correct.

9 Q. This was outside the Security Council in the United  
12:40:24 10 Nations?

11 A. Correct.

12 Q. Yes. As far as --

13 A. It was after Mr Moreno-Ocampo had spoken to the Security  
14 Council.

12:40:33 15 Q. I see. You took time from your schedule to go to the  
16 council on that day, correct?

17 A. I did.

18 Q. And the person you referred to now, Mr Ocampo, is the  
19 Prosecutor of the International Criminal Court?

12:40:47 20 A. He is.

21 Q. Now, as you sit there now, has President Omar al-Bashir  
22 been convicted of any crimes for Darfur?

23 A. He's indicted for the crime of genocide, crimes against  
24 humanity, war crimes.

12:41:03 25 Q. Yes, the key word is "indicted"?

26 A. Yes.

27 Q. Has he been convicted? Let me repeat my question. With  
28 respect, as you sit there now, has the President of the Sudanese  
29 people, Omar al-Bashir, been convicted of any war crimes?

1 A. He has not come to court yet.

2 Q. But from that video and from what you said in court, it is  
3 correct that your view is that he is guilty?

4 A. My view comes from the countless people I have spoken to.

12:41:35 5 Q. My question, Ms Farrow, I understand where your view comes  
6 from --

7 MR KOUMJIAN: She should be allowed to answer the question  
8 without counsel interrupting her answer.

9 PRESIDING JUDGE: Mr Koumjian, you're interrupting. We  
12:41:50 10 cannot have two counsel speaking at the same time.

11 Mr Anyah, repeat your question.

12 MR ANYAH: Thank you, Madam President.

13 Q. Ms Farrow, just listen to the question. From that video  
14 and from what you have said in court, it is correct that your  
12:42:06 15 view is that he is guilty?

16 A. My view is that he is guilty.

17 Q. And he is guilty in your view even though he has not yet  
18 been tried?

19 A. He is guilty in my view.

12:42:19 20 Q. Even though he has not yet been tried?

21 A. Even though.

22 Q. Yes. Shall we look at your blog? We were at your blog,  
23 which is at tab 7, and I will need the documents in tabs 1 and in  
24 tab 7. Ms Farrow, I have only a few more questions, I will not  
12:42:46 25 be long. We won't keep you.

26 A. Okay.

27 Q. Yes. We have gone through the article regarding President  
28 Obama, but let's wait for the court officer to display all the  
29 documents.

1 A. Okay.

2 Q. Thank you.

3 A. I'm happy to answer your questions, by the way. It's not a

4 --

12:43:15 5 Q. I understand, there is just a procedure we follow in court  
6 so that everybody can follow along, so we have to go slowly.

7 A. Sure.

8 Q. So first, Madam Court Usher, just to assist you I will just  
9 read the titles in the following pages that come after the first

12:43:32 10 page. So we've seen page 1. Let's look at page 2. These are  
11 all from your blog, Ms Farrow, and if anything is not from your  
12 blog, please point it out to me.

13 Madam Court Usher, we've read page 2. Shall we go to page

14 3? And if you could scroll to the bottom, please. Yes. At the

12:44:07 15 bottom of that page, from your blog, the title is, "Disgusting,  
16 Bashir gets away with genocide with UN approval."

17 Did you write those words, Ms Farrow?

18 A. Yes.

19 Q. Okay. Shall we go to the next page? And the page after

12:44:27 20 that. The page after that. This was posted on 29 July 2008, the  
21 title is, "Shame on Mbeki." Mbeki is Thabo Mbeki, the former  
22 President of the Republic of South Africa?

23 A. Yes.

24 Q. You say on your blog:

12:45:04 25 "South Africa is trying to block the ICC genocide  
26 indictment of al-Bashir. Given Mbeki's abysmal record on AIDS,  
27 Zimbabwe and Darfur this is no surprise. No one will take South  
28 Africa seriously as long as he remains in power."

29 You wrote those words?

1 A. Yes.

2 Q. Now, we go to the next page. We see a title, "Darfur!  
3 Another year later." And we see a link to an article and then we  
4 see December 8th, 2008, and it says, "Check out this YouTube link  
12:45:57 5 on DRC mining." And there is a YouTube link. The word "mining"  
6 there, does it refer to diamonds or another mineral?

7 A. Other minerals, cassiterite, there is a lot being mined in  
8 Congo, North Kivu.

9 Q. Thank you, Ms Farrow.

12:46:24 10 Madam President, before I go to the document at tab 1, can  
11 I ask that all the documents in tab 7 and the two videos we have  
12 played all be marked for identification, please.

13 PRESIDING JUDGE: I know or I recall that the first video  
14 clip was of ABC News; is that correct?

12:46:52 15 MR ANYAH: That is correct, Madam President.

16 PRESIDING JUDGE: This was an interview of ABC News -  
17 rather, by ABC News of Mia Farrow. I'm not sure of the date.  
18 What date was it? What date was this interview?

19 MR ANYAH: I do not know the date. I know the date of  
12:47:14 20 broadcast but the witness is here and perhaps the witness can  
21 help us.

22 Q. Ms Farrow, do you remember on which day ABC News cameramen  
23 came to your home?

24 A. You're asking me for a date, sir, again, I'm sorry, I can't  
12:47:27 25 provide you with that.

26 PRESIDING JUDGE: In any event, that is MFI-15.

27 Now, the next video clip which will be marked MFI-16, that  
28 is a video clip again of the witness's interview by who?

29 MR ANYAH: It is a video clip of the witness addressing the

1 media outside the Security Council chamber of the United Nations.

2 PRESIDING JUDGE: Very well, that is marked MFI-16.

3 Now, the documents behind tab 7, I'm just going to give  
4 them one number, that is MFI-17, and these are excerpts out of

12:48:20 5 the blog of Mia Farrow. MFI-17.

6 MR ANYAH: Thank you, Madam President.

7 Q. Now, there are two documents I'd like to go to, it's tab  
8 number 1 and it comes from your blog. There are three documents  
9 in that tab, the first one has a picture of you, and I want to  
10 start with that one.

12:48:47

11 A. I'm sorry, where are you?

12 Q. Yes.

13 A. Oh, that's the home page of my website.

14 Q. Okay. And that's what we mean by your blog; is that

12:49:02 15

correct?

16 A. That's correct.

17 Q. Yes. Now, we see a picture of you.

18 A. It's always there on the home page.

19 Q. Okay. We understand. At the top left-hand corner we see  
20 the date and this is written in the English sequence, 6 August

12:49:13 21

2010. We then see miafarrow.org and there is a date below that.

22 It's not very visible because on your website the dates are in a

23 light colour but it still appears, it's 5 August 2010, correct?

24 A. Correct.

12:49:35 25

25 Q. And the title of this article is, "Conflict Minerals,  
26 Charles Taylor and Beyond." Let's pause for a minute, Ms Farrow.  
27 This article in your blog was uploaded in your blog on the day  
28 Naomi Campbell testified before this Court, last Thursday,  
29 correct?

1 A. If you say so.

2 Q. Well, it bears a date, 5 August 2010.

3 A. Yes.

4 Q. Yes?

12:50:07 5 A. Yes.

6 Q. So that was the day Naomi Campbell testified in this Court,  
7 yes?

8 A. Well, here is the thing. What is this, the 8th?

9 Q. The 8th is the day our office printed it from your blog.

12:50:23 10 A. Oh. I took it from The Guardian, whenever that appeared  
11 so, yeah.

12 Q. And at the top right below the title is a link to The  
13 Guardian. It says, "http.www.guardianukworld2010", yes?

14 A. Correct.

12:50:42 15 Q. And you see the date of The Guardian, August 5, and the  
16 title, "Blood diamonds"?

17 A. Correct.

18 Q. So what you did on your blog was that on the day Naomi  
19 Campbell testified, you uploaded, that is, put a link to an

12:50:59 20 article from The Guardian and you uploaded that article onto your  
21 website, correct?

22 A. Correct.

23 Q. Now, in the same tab we've provided the document behind  
24 this first page is the actual Guardian publication. Yes, you

12:51:14 25 could display it.

26 A. Right.

27 Q. Yes. This is the article you uploaded onto your website?

28 A. Well, I cut and paste.

29 Q. Yes, exactly you cut and paste. Let's be clear on that

1 now, Ms Farrow, because it may be important later on. When you  
2 say you cut and pasted the article, you mean you edited it, that  
3 is, you did not cut and paste everything on your website?

4 A. Right.

12:51:47 5 Q. You only cut and pasted some aspects of it on your website?

6 A. Correct.

7 Q. Correct? Now, let's look at the Guardian article, the  
8 title is, "Everything you need to know about blood diamonds.

9 What is the background to Naomi Campbell's appearance at Charles  
10 Taylor's war crimes tribunal?" And then the article commences.

11 A. Right.

12 Q. Now, the article, you will agree, has different portions to  
13 it and there are question marks in the different subheadings, for  
14 example, beneath the picture you have, "What are blood diamonds?"

12:52:26 15 Yes?

16 A. Correct.

17 Q. And then the next section deals with what is Charles Taylor  
18 on trial at - "Why is Charles Taylor on trial at The Hague?"

19 Yes?

12:52:35 20 A. Yes.

21 Q. And when you reproduced the article on your blog, we go to  
22 the first page, Madam Court Usher. When you reproduced the  
23 article on your blog, you removed those subheadings. They are no  
24 longer present on your blog, yes?

12:52:52 25 A. Well, one of them is. "Why is Charles Taylor on trial at  
26 The Hague" is there, but, you know, people who follow my blog  
27 know that I'll take what I consider, for my purposes, to be  
28 relevant and/or instructive and then I'll put the link and they  
29 can go to the real - the original article. So I just highlight

1 little parts of it.

2 Q. Yes. So one of the subheadings is there but the others -  
3 the fact is you removed those subheadings?

4 A. Yeah.

12:53:21 5 Q. Okay. Now, let us look at the Guardian article, second  
6 page, first full paragraph. Ms Farrow, I want you to pay  
7 attention to this bit of information. We see the title there,  
8 "Why was Naomi Campbell called as a witness?" That does not  
9 appear on your blog. We then start with the first sentence, this  
12:54:01 10 is the Guardian article, it says, "The supermodel was called to  
11 testify by the Prosecution for having allegedly received a  
12 diamond as a gift from Taylor in 1997. There is no suggestion  
13 that Campbell knew the possible origin of the diamond. She  
14 admitted in court to receiving 'dirty looking diamonds' that she  
12:54:31 15 was later told came from Taylor."

16 Now, let's consider the version of that paragraph on your  
17 blog, what you uploaded; shall we go back to the first page?  
18 That same paragraph on your blog, while in The Guardian it  
19 starts, "The supermodel was called to testify", on your blog it  
12:54:54 20 reads, "Naomi Campbell was called to testify." Do you see that,  
21 Ms Farrow?

22 A. Yes.

23 Q. So you removed the word "supermodel" in relation to Naomi  
24 Campbell and replaced it with "Naomi Campbell". Is that fair to  
12:55:08 25 say?

26 A. That's fair to say.

27 Q. Yeah. When we read that paragraph and we continue, the  
28 paragraph in your blog ends with the sentence, "There is no  
29 suggestion that Campbell knew the possible origin of the



1 di amond." Correct?

2 A. Correct.

3 Q. When we go to the Guardian article, we see that you have  
4 removed from your blog the last sentence of that paragraph from  
12:55:35 5 The Guardian which says, "She admitted in court to receiving  
6 dirty looking stones" - sorry, "dirty looking diamonds that she  
7 was later told came from Taylor." Do you see that?

8 A. I do.

9 Q. So you did remove that part of the Guardian article?

12:55:53 10 A. Yes.

11 Q. Now, let's go to the next paragraph. Let's start with the  
12 Guardian article. This is a paragraph on the second page of the  
13 Guardian article. Madam Court Usher, can you - yes, that's the  
14 correct page. Ms Farrow, are you following me?

12:56:10 15 A. I believe so.

16 Q. The second page of the Guardian article?

17 A. Yes.

18 Q. Yes. Now, you remember I read the first paragraph dealing  
19 with the supermodel who was called to testify. I'm now on the second  
12:56:25 20 paragraph. It reads: "Prosecutors say the story, if true, would  
21 back up allegations that Taylor traded guns to neighbouring  
22 Sierra Leone rebels in exchange for uncut diamonds."

23 A. Mm-hm.

24 Q. Have you seen what I've read?

12:56:47 25 A. I have.

26 Q. "Prosecutors say the story, if true, would back up  
27 allegations that Taylor traded guns to neighbouring Sierra Leone  
28 rebels in exchange for uncut diamonds."

29 Shall we see how you reproduce that on your blog? Here is

1 what you wrote on your blog. You wrote, "Prosecutors say the  
2 story backs up allegations." You took out the words, "If true".  
3 You see that, Ms Farrow?

4 A. Yes.

12:57:33 5 Q. On your blog you wrote, "Prosecutors say the story backs up  
6 allegations that Taylor traded guns to neighbouring Sierra Leone  
7 rebels." Why did you take out the words "if true", words that  
8 give Mr Taylor a fighting chance, that suggest the allegations  
9 are not yet proven? Why did you take those out?

12:57:54 10 A. Because I felt it was referring to the story that Naomi  
11 said that morning about that, that she had received diamonds from  
12 Charles Taylor, a diamond from Charles Taylor, and I couldn't  
13 bring myself to write, "if true", because I knew that was true.  
14 So I just link to the entire story, and I only put what I thought  
12:58:15 15 to be the highlights.

16 Q. You said - you just said, "I couldn't bring myself to write  
17 'if true'?"

18 A. Because it is true.

19 Q. You feel it is true?

12:58:26 20 A. Well, it's a personal blog.

21 Q. Yes?

22 A. So I can't say, you know, "if it's true", because I know it  
23 is true.

24 Q. You know it is true?

12:58:34 25 A. Mm-hm.

26 Q. Yes?

27 PRESIDING JUDGE: But, Ms Farrow, perhaps I misunderstood,  
28 this excerpt on your blog is supposed to be a reflection of what  
29 somebody else wrote, namely The Guardian, isn't it?

1 THE WITNESS: It is true.

2 PRESIDING JUDGE: Why, then, would you edit words so vital  
3 as, "if true"?

12:59:03

4 THE WITNESS: In retrospect, I should have left it in, your  
5 Honour.

6 PRESIDING JUDGE: Yes. But that doesn't answer my  
7 question: Why did you take them out?

12:59:18

8 THE WITNESS: Because I felt convinced that that story is  
9 true, if we are referring to Naomi Campbell's story to me, and  
10 I was receiving so many calls from the press and people writing,  
11 "What is going on?" So I wanted to inform them; I provided them  
12 with a link to the full article and I just wanted to put the  
13 highlights of what the essence of my appearance - but I couldn't  
14 put that - would be at the Court, why Naomi Campbell was there,  
15 what Charles Taylor is alleged to have done. I do use the word  
16 "alleged", because I just took out "if true", but when quoting  
17 another article I probably shouldn't edit it, but I do it all the  
18 time in my blog. I'll just take out a paragraph or sentence and  
19 then usually I'll say, "Please see, contact this link for the  
20 entire article."

13:00:05

21 PRESIDING JUDGE: Thank you. Please proceed.

22 MR ANYAH:

13:00:20

23 Q. So, Ms Farrow, we have the media, The Guardian, making a  
24 qualification in its statement, saying, "Prosecutors said that,  
25 if true, the allegations would be backed up." You, on the other  
26 hand, removed the qualification, "if true", and you said,  
27 "Prosecutors say the story backs up allegations." There is a  
28 vital difference between the two narrations, correct?

29 A. Correct. For my - for my readers of my blog, I wanted to

1 make it personal, and I couldn't go beyond that, except to say  
2 this is what happened. And probably I shouldn't have used The  
3 Guardian to convey my own position, but the story is true, so  
4 I felt on my blog it would be misleading to say, "if true",  
13:01:09 5 because it is true.

6 Q. And your blog, as you rightly say, it's personal to you,  
7 correct?

8 A. It is.

9 Q. It discloses your firmly-held beliefs and opinions?

13:01:20 10 A. It does, yes.

11 Q. You do not hesitate, when you write something in your blog,  
12 you pour out your soul into your articles, correct?

13 A. Correct.

14 Q. And this reflects your belief about --

13:01:32 15 A. Yes, it's not true journalism unless I write for, such as  
16 the Wall Street Journal, that is a journalistic contribution; but  
17 the blog is simply my thoughts and feelings and, because I didn't  
18 feel it was appropriate to write about my coming here, even  
19 though it was being talked about, or what it was all about,  
13:01:56 20 I used The Guardian to convey what the trial is about, what  
21 Mr Taylor is here for, what Naomi Campbell is on the stand for,  
22 and I go on to say about conflict minerals elsewhere. I felt  
23 that was important too, so --

24 Q. You did all of those things and then you removed the  
13:02:18 25 qualifying words, "if true"?

26 A. Yes.

27 MR ANYAH: May I have a moment, Madam President? And may  
28 I ask, Madam President, that all documents in tab 1 be marked for  
29 identification.

1           PRESIDING JUDGE: Very well. The documents, again from the  
2           miafarrow.org blog behind tab 1 are marked MFI-18.

3           MR ANYAH: Madam President, I have no further questions for  
4           the witness. Thank you.

13:02:52 5           PRESIDING JUDGE: Mr Koumjian? Questions in  
6           re-examination?

7           MR KOUMJIAN: Your Honour, I just wanted to remind counsel  
8           that counsel was going to get back to the Court, through the help  
9           of his team, to identify whether there was any basis for the  
13:03:10 10          question about Carole White having been at breakfast.

11          MR ANYAH: Madam President, my team has gotten back to me.  
12          I have the relevant citations. Naomi Campbell's testimony from 5  
13          August, the relevant pages are these: Page 45469, lines 1  
14          through 5. These pages confirm, by the way, that Carole White  
13:03:39 15          was at the breakfast. Page 45471, lines 10 through 19. Page  
16          45474, lines 20 through 24. Page 45475, lines 16 through 19.  
17          Page 45476, lines 17 through 24. Page 45481, lines 13 through  
18          16. And importantly at page 45494, lines 12 through 20. I hope  
19          that satisfies counsel.

13:04:23 20          MR KOUMJIAN: Actually, your Honour, it does not. I think  
21          that's rather disingenuous, because what counsel put to the  
22          witness is that Carole White had told the Prosecution that she  
23          was at the breakfast, and that is what counsel was going to look  
24          through the statements of Carole White to find.

13:04:40 25          PRESIDING JUDGE: Very well. That is noted. But,  
26          Mr Koumjian, do you have any questions in re-examination?

27          MR KOUMJIAN: No, I do not. Thank you, your Honours.

28          PRESIDING JUDGE: I will inquire of the judges if they do  
29          have any questions.

1 JUDGE DOHERTY: Ms Farrow, you gave an estimate of how many  
2 people you thought were at the dinner that night. Court has also  
3 heard another estimate from another witness. When you gave that  
4 estimate, did you include yourself and your three children in  
13:05:17 5 making up that number?

6 THE WITNESS: I would like to retract my estimate, since  
7 I honestly have no idea how many were at the dinner that night.

8 JUDGE DOHERTY: Thank you, that's my only question.

9 THE WITNESS: Thank you.

13:05:32 10 PRESIDING JUDGE: Ms Farrow, I do have a number of  
11 questions for you. You've told the Court that you're an actress,  
12 at least that's one of the things you are.

13 THE WITNESS: I was.

14 PRESIDING JUDGE: Or was. And we've seen a video clip, one  
13:05:47 15 of the video clips that refers to the movie "Blood Diamond".  
16 Have you ever watched that movie?

17 THE WITNESS: I think I saw part of it on television.  
18 I didn't see it in its entirety.

19 PRESIDING JUDGE: Of course you're aware that in that  
13:06:03 20 movie, the key item is a huge diamond, uncut diamond.

21 THE WITNESS: Yes.

22 PRESIDING JUDGE: Do you not?

23 THE WITNESS: Yes, your Honour.

24 PRESIDING JUDGE: Now my question is: Is there a  
13:06:16 25 possibility that the reference to a huge uncut diamond, often  
26 very well - very often referred to, in light of this movie, could  
27 have coloured your memory of what it is that Naomi Campbell said  
28 to you that morning at breakfast? That you might have - you  
29 might have remembered her saying a huge diamond when, in fact,

1 she said to you, a few small stones?

13:07:06 2 THE WITNESS: No, your Honour. I know that she didn't say  
3 "a few". And certainly not "stones". She may not have used the  
4 word "huge" but she did say "a diamond". And my recollection may  
5 not be accurate on the size part. She might have said "large",  
6 she might have just said "a diamond", it might have been "a huge  
7 diamond." It wasn't "several diamonds", and it certainly wasn't  
8 "stones in the night". Because why would - I mean stones in the  
9 night? Why would she give stones to Nelson Mandela's children's  
13:07:28 10 charity? That wasn't it. It was a diamond. And if I thought  
11 there were more than one, I would say so. She said "a diamond".  
12 And I guess now there are more, but that wasn't what was said  
13 that morning.

14 PRESIDING JUDGE: Very well. Now, my second question  
13:07:43 15 relates to your testimony when you've arrived at the guesthouse,  
16 you're in a lobby, a large room, and you said some men were  
17 walking up to you and your children at which stage Graca Machel  
18 moved you out of the way.

19 THE WITNESS: At the President's house.

13:08:03 20 PRESIDING JUDGE: At the President's house, yes. These  
21 men, who were they?

22 THE WITNESS: Well, I think she said, "This is President  
23 Charles" - "the President of Liberia." Because I knew it was the  
24 President of Liberia. She probably - I mean, I have to recap  
13:08:31 25 what I think was said. I think she said, "This is Charles  
26 Taylor, the President of Liberia" or just she said "the President  
27 of Liberia" and then she said in effect, "He's not supposed to be  
28 here", or, "He should have gone by now. Come over here. He's  
29 supposed to be gone." Something to that effect.

1 PRESIDING JUDGE: Was he alone, Charles Taylor?

2 THE WITNESS: He should have - no, there was a group. I  
3 don't know how many, I don't remember how many, but several men.

13:09:05

4 PRESIDING JUDGE: And did Ms Machel actually introduce you  
5 to Mr Taylor that day?

6 THE WITNESS: I was introduced to him, but I don't remember  
7 at what point, whether it was initially and then I was moved off,  
8 or whether later I was introduced because there was this  
9 celebrity photograph, my children were not in that photograph, so  
10 there was that photograph. But I - but I'm trying to remember  
11 whether she said "he should have" - "he shouldn't be" - "he  
12 should have gone by now", "he should have left by now". It was  
13 that effect.

13:09:20

14 PRESIDING JUDGE: And who introduced you to Mr Taylor?

13:09:39

15 THE WITNESS: If it - if it was before - if it was at that  
16 moment it would have been Mrs Machel. If it was later it could  
17 have been anybody. I don't know, I'm sorry.

18 PRESIDING JUDGE: So the sequence is she introduces you to  
19 Mr Taylor and then quietly moves you away from his presence?

13:09:58

20 THE WITNESS: That is a probable scenario. I don't think  
21 she would have moved us away, unless she would have said, "That  
22 is the President of Liberia. He's not supposed to be here. He  
23 should have gone by now," and moved us away and I met him later.  
24 Either is possible, but I knew it was the President of Liberia  
25 and I know we were moved a bit away.

13:10:18

26 PRESIDING JUDGE: Very well. So we now get to the dinner  
27 table and you testified that you didn't remember whether  
28 Mr Taylor was at the table. Do you remember where you were  
29 seated in relation to Mr Mandela, your host?



1 THE WITNESS: No, I don't. He was not immediately - he was  
2 not very near me. I know that Imran Khan and Jemima Khan were  
3 next to me and most of my conversation and with the children was  
4 with them. And I don't remember where President Mandela was  
13:11:04 5 seated or Mrs Machel. I don't remember how many tables there  
6 were. And if it was one table, perhaps they were far enough away  
7 that they were not part of - certainly not part of my immediate  
8 conversation.

9 PRESIDING JUDGE: So you can't recall if you sat at the  
13:11:21 10 same table with Nelson Mandela?

11 THE WITNESS: I can't, your Honour, I'm sorry.

12 PRESIDING JUDGE: Very well. Now, the next morning at  
13 breakfast, you said that Ms Campbell came down and joined you and  
14 your children at table and that she recounted the events of the  
13:11:38 15 previous night to you.

16 THE WITNESS: And there were others at the table.

17 PRESIDING JUDGE: Others sitting at the table. Can you  
18 describe to us Ms Campbell's demeanour as she was telling this  
19 story? She comes down for breakfast, joins you at the table.  
13:11:53 20 Just recount for us her demeanour.

21 THE WITNESS: As I remember it, she didn't even sit down  
22 before she had said, "In the middle of the night these men  
23 knocked at my door and they were representatives of Charles  
24 Taylor and he's given me a huge diamond." That's what  
13:12:09 25 I remember. And then she said, "Of course I'm not going to keep  
26 it. I'll give it to Madiba's children's charity." That all came  
27 out I think before she even sat down.

28 PRESIDING JUDGE: Yes, yes, but I'm referring to her  
29 demeanour.

1 THE WITNESS: Her demeanour seemed excited, I would say.

2 PRESIDING JUDGE: Was she smiling?

3 THE WITNESS: Yes.

4 PRESIDING JUDGE: Did she seem stressed, worried?

13:12:32 5 THE WITNESS: No, no. She seemed excited, happy.

6 PRESIDING JUDGE: Now, my next question is: Do you recall

7 whether Mr Taylor came on the Blue Train ride with you?

8 THE WITNESS: No, he definitely didn't.

9 PRESIDING JUDGE: Now, on the Blue Train ride, did you sit

13:12:54 10 with Ms Campbell?

11 THE WITNESS: Well, it was an overnight trip and I was in a  
12 cabin with one of my children, with the youngest one, Ronan. The  
13 other two of my children went by road. So it was - we spent the  
14 night on the Blue Train and one of the meals we had with

13:13:15 15 President Mandela and Mrs Machel, Naomi and myself, just the four  
16 of us. My child wasn't invited to that luncheon. Or I think it  
17 was a lunch.

18 PRESIDING JUDGE: And, lastly, do you recall during that  
19 ride if Ms Campbell said anything to you about what she did with  
13:13:36 20 the diamonds?

21 THE WITNESS: No. I didn't - honestly I didn't think about  
22 it again. She didn't bring it up again and I forgot about it.

23 PRESIDING JUDGE: Thank you. Those are my only questions.  
24 I don't know if there are questions arising out of my questions  
13:13:53 25 or the judges' questions.

26 MR ANYAH: None from the Defence, Madam President.

27 MR KOUMJIAN: No, your Honour, thank you.

28 THE WITNESS: Your Honour, may I say something? I think  
29 I assumed at that point it was a diamond as Ms Campbell said

1 she's accustomed to receiving. I didn't know it was diamonds in  
2 the rough. I guess I thought it was a man smitten who had given  
3 her a gift and I too pictured a diamond in a box or something.  
4 I didn't - she didn't say it was in the rough.

13:14:30 5 PRESIDING JUDGE: You are now saying, Ms Farrow, that it is  
6 quite possible that Ms Campbell actually alluded to diamonds in  
7 the plural?

8 THE WITNESS: I'm saying that? No, as I remember, it was a  
9 diamond.

13:14:47 10 PRESIDING JUDGE: In any event, I want to thank you for  
11 your testimony before the Court. You've now come to the end of  
12 that testimony and you are discharged and we wish you a safe  
13 journey home.

14 THE WITNESS: Thank you very much.

13:15:01 15 PRESIDING JUDGE: There are a number of MFIs that were  
16 marked that we need to deal with. We will start with the  
17 Prosecution.

18 MR KOUMJIAN: Your Honours, Prosecution moves MFI-11A and  
19 B, that's a short video clip and transcript, into evidence.

13:15:42 20 I would indicate we have no objection to any of the Defence MFIs.

21 PRESIDING JUDGE: Thank you.

22 MR ANYAH: Thank you, counsel. Madam President, we  
23 respectfully ask that all of our MFIs be admitted. Madam  
24 President, in addition, I will also request that MFI-14 - well,

13:16:10 25 we ask that all our MFIs be admitted into evidence and we have no  
26 objections to any of the Prosecution's MFIs.

27 PRESIDING JUDGE: Yes. I think MFI-14 is a Defence  
28 exhibit, not a Prosecution exhibit. But in any event, Madam  
29 Court Manager, the next available number for Prosecution exhibits

1 is 558, is it?

2 MS IRURA: That's correct, your Honour.

3 PRESIDING JUDGE: The video clip and the transcripts  
4 formerly MFI-11A and B are admitted in evidence as exhibit P-558.

13:17:19 5 Yes, P-558A and 558B respectively.

6 [Exhibits P-558A and B admitted]

7 Now, MFI-12, which was a photograph depicting the witness  
8 Mia Farrow, Ms Campbell, President Nelson Mandela and a group of  
9 models, and this was a photograph taken in the year 1998, that is  
10 a Defence exhibit, now exhibit D-426.

13:17:57

11 [Exhibit D-426 admitted]

12 The next is a group of two photographs, a photograph of  
13 President Nelson Mandela and Liberian President Charles Taylor  
14 addressing the media at Mandela's State House residence in  
15 Pretoria, September 25, 1997. Now, the smaller of the  
16 photographs is admitted as exhibit D-427A, and the enlargement of  
17 the same photograph is exhibit D-427B.

13:18:32

18 [Exhibit D-427A and B admitted]

19 The next, MFI-14, which is the summary of the programme for  
20 the Blue Train launch, that is now admitted as exhibit D-428.

13:19:03

21 The next one is a video clip of ABC News interviewing  
22 Ms Mia Farrow. That is admitted as exhibit D-429.

23 And MFI-16 is another video clip of Mia Farrow addressing  
24 the United Nations - actually outside the building of the United  
25 Nations, just after the Security Council meeting, and this is  
26 admitted as exhibit D-430.

13:19:55

27 MFI-17, which consists of various excerpts from the blog of  
28 Mia Farrow, miafarrow.org, consisting of eight pages behind tab  
29 7, those are admitted collectively as exhibit D-431.

1 And MFI-18, which is various exhibits from the same blog,  
2 behind tab 1, consisting of three pages, those are admitted as  
3 exhibit D-432 collectively.

4 [Exhibits D-428 to D-432 admitted]

13:21:05 5 PRESIDING JUDGE: Mr Koumjian, could you call your next  
6 witness, please?

7 MS HOLLIS: Madam President, I'll be taking the next  
8 witness and the next witness is Carole White. She will testify  
9 in English and she will swear on the Bible. And if I may be  
10 allowed to change places with Mr Koumjian and set up?  
13:21:24

11 PRESIDING JUDGE: I do recall that Ms White's lawyer was  
12 given the right of appearance and I don't know if he's in court.  
13 Is he?

14 MR TOWNSEND: Your Honour, I can represent to you that  
13:21:58 15 Mr Dan Bright, Ms Carole White's lawyer, is present and here,  
16 your Honour, and available and I think the intention was to seat  
17 him in the position behind me.

18 PRESIDING JUDGE: Well, please do get that done because  
19 that was the Court order. Actually, before the witness is  
13:22:26 20 brought in, I would like to see her lawyer sitting in the Court.

21 I would like to hear from Ms White's lawyer by way of  
22 appearance if you could kindly introduce yourself, sir.

23 MR BRIGHT: Daniel Bright representing Carole White.

24 PRESIDING JUDGE: You are welcome to the Court, sir. Thank  
13:23:14 25 you.

26 WITNESS: CAROLE WHITE [Sworn]

27 EXAMINATION-IN-CHIEF BY MS HOLLIS:

28 Q. Good morning, Ms White.

29 A. Good morning.

- 1 Q. Would you please tell the Court your name?
- 2 A. Carole White.
- 3 Q. And would you please spell your first name for the Court?
- 4 A. C-A-R-O-L-E.
- 13:24:19 5 Q. And your last name, White, is spelled in the normal way?
- 6 A. Correct.
- 7 Q. Could you please tell us your date of birth?
- 8 A. 17/7/50.
- 9 Q. 17th of July?
- 13:24:33 10 A. Yes, 17th of July, 1950.
- 11 Q. And your place of birth?
- 12 A. Deal in Kent, UK.
- 13 Q. And could you please tell us the city and country of your
- 14 current residence?
- 13:24:46 15 A. London, England.
- 16 Q. What is your occupation?
- 17 A. I'm a model agent.
- 18 Q. And for how long have you been a model agent?
- 19 A. About 30 years.
- 13:24:58 20 Q. Do you know Naomi Campbell?
- 21 A. I do.
- 22 PRESIDING JUDGE: Ms Hollis, what is a model agent? Excuse
- 23 some of our ignorance. What is a model agent?
- 24 THE WITNESS: I find work for photographic models and
- 13:25:15 25 runway models.
- 26 MS HOLLIS:
- 27 Q. And when you say you find work, do you do anything for them
- 28 other than finding work for them?
- 29 A. Yes. I find doctors for them, dentists, hairdressers,

1 I travel with them sometimes, and I negotiate contracts.

2 Q. And do you also take care of the details of travel when you  
3 travel with them?

4 A. Extensively, yes.

13:25:43 5 Q. Now, I had asked you if you knew Naomi Campbell. You said  
6 that you did. How long have you known Naomi Campbell?

7 A. Approximately 18 years.

8 Q. And how is it that you met Naomi Campbell?

9 A. I met her when I joined up with an agency from New York  
13:26:15 10 called Elite, and she was one of their models, and then she  
11 became one of my models, and I met her in London.

12 Q. And what was your relationship to her when you were with an  
13 agency in New York called Elite?

14 A. Well, I was her agent in London, and then I became her  
13:26:33 15 mother agent, which meant I'm her - I was her main agent, and  
16 I looked after her for everything she needed.

17 Q. And for how long did this relationship with Ms Campbell  
18 last?

19 A. Seventeen years.

13:26:49 20 Q. Until when?

21 A. Until about 2006.

22 Q. Now, you have explained in general the duties of a model  
23 agent. Could you tell us your specific duties in relation to  
24 Naomi Campbell?

13:27:09 25 A. With Naomi Campbell, I found her work, I negotiated  
26 contracts for her, I got the best deal I could. I also did all  
27 the logistics, the travel arrangements. If she needed a  
28 bodyguard, if she needed a hairdresser, a make-up artist, I would  
29 negotiate that and arrange for them to be with her. I'd also

1 arrange for her to have dresses sent to her if she had to attend  
2 a special event in the evening, and jewellery. I basically did a  
3 lot for her, to make her life, which was quite stressful, easier.

4 Q. Now, I'd like to draw your attention to September of 1997.

13:28:00 5 In September of 1997, did you undertake any travel with Naomi  
6 Campbell?

7 A. Yes, I did. In September of 1997, I accompanied her on a  
8 trip to South Africa to go on the Blue Train from Pretoria to  
9 Cape Town, and that involved going to a dinner at President  
10 Mandela's house, staying the night at his guesthouse, and the  
11 following morning going on the Blue Train with him and various  
12 other celebrities.

13:28:31 10

13 Q. Now, before we get to those details, for this particular  
14 trip that you made with Ms Campbell, what were your duties in  
15 relation to that trip?

13:28:53

16 A. I arranged her travel to the UK from Milan. I arranged for  
17 her to - I arranged for her to be met at London airport to take a  
18 plane to South Africa, and I accompanied her.

19 Q. And you mentioned that you accompanied her to South Africa  
20 to go on the Blue Train from Pretoria to Cape Town, and could you  
21 tell us what was the purpose of that trip on the Blue Train?

13:29:22

22 A. It was a promotional trip. It was the first time the Blue  
23 Train - it had been refurbished, and it was the first time it had  
24 been used, and it was used in connection with Nelson Mandela's  
25 Children's Fund. That was the charity that they chose. And the  
26 trip on the Blue Train was an experience, and at the end of it,  
27 there was a big ball and an auction for the charity, in Cape  
28 Town.

13:29:47

29 Q. Now, you mentioned that you, on this trip, were involved in



1 arranging some of the logistics for Ms Campbell. Were you given  
2 an agenda or itinerary for this trip to South Africa?

3 A. I was.

13:30:24

4 Q. And the agenda or itinerary that you were given, was it a  
5 general one or was it a specialised one for Ms Campbell?

6 A. I would say it was probably the same for all the guests.

7 Q. And were you given one for Ms Campbell herself?

8 A. I was.

9 Q. Did you keep those itineraries for this event?

13:30:44

10 A. I did keep those itineraries.

11 Q. Did you provide those itineraries to the Prosecution in  
12 this case at some point?

13 A. I did.

14 MS HOLLIS: I would ask that the witness be shown --

13:30:59

15 PRESIDING JUDGE: Ms Hollis, I'm wondering, I have my eye  
16 on the clock. I'm wondering if it's not better that we handle  
17 this after the luncheon break.

18 Ms White, I do apologise but this is the time of the day we  
19 have our luncheon break, and we will adjourn now for an hour and  
20 reconvene at 2.30. You can continue your testimony then.

13:31:17

21 Court adjourns.

22 [Lunch break taken at 1.31 p.m.]

23 [Upon resuming at 2.32 p.m.]

24 PRESIDING JUDGE: Good afternoon. Mr Griffiths, you are on  
25 your feet.

14:32:20

26 MR GRIFFITHS: Madam President, can I alert the Court to a  
27 potential difficulty tomorrow morning, depending on the length of  
28 time I spend with this witness.

29 DCT-172, whose testimony has been adjourned, has a dental

1 appointment tomorrow morning at 10. And I've just been told by  
2 those responsible for his transport that, as a consequence, he  
3 cannot be here before 11 o'clock in the morning.

4 PRESIDING JUDGE: Yes. The Chamber is aware of that  
14:32:57 5 arrangement. I do recall my comments last week when I said that  
6 we were thinking to hold a status conference after the two  
7 Prosecution witnesses have testified - rather, the three  
8 Prosecution witnesses have testified - and that might well be  
9 tomorrow morning. If that is indeed the case, if Ms White's  
14:33:23 10 testimony concludes before 11, that is what we plan to do.

11 MR GRIFFITHS: Very well.

12 PRESIDING JUDGE: But in any event, even if it concludes  
13 after 11, we still intend to hold a status conference, in any  
14 event, soon after, even if Mr Sesay is back in court.

14:33:41 15 MR GRIFFITHS: Very well.

16 PRESIDING JUDGE: So, Ms Hollis, please continue.

17 MS HOLLIS: Thank you, Madam President. I would also note  
18 for the record that Nicholas Koumjian and Mohamed A Bangura are  
19 no longer at the Prosecution table.

14:34:00 20 Q. Ms White, before we had the adjournment for lunch, I was  
21 asking you about a September 1997 trip that you took to South  
22 Africa with Naomi Campbell, you recall?

23 A. I do.

24 Q. And I had asked you if you were given an itinerary or  
14:34:19 25 schedule for that trip and you had indicated that you had been  
26 given such itinerary or schedule, do you recall that?

27 A. Yes.

28 Q. And you indicated that you - included in the itineraries  
29 you were given was an itinerary for Ms Campbell, you recall?

1 A. Correct.

2 Q. And then you had said that at some point you had provided  
3 copies of these itineraries to the Prosecution?

4 A. Yes.

14:34:44 5 MS HOLLIS: I would at this point ask that the witness be  
6 shown documents behind two tabs; first of all, tab 2 and then,  
7 shortly after that, tab 3 of the Prosecution bundle of documents  
8 for Carole White and Mia Farrow.

9 PRESIDING JUDGE: Ms Hollis, has this document behind tab 2  
14:35:10 10 just been admitted as an exhibit?

11 MS HOLLIS: I believe that it has and this is a copy of  
12 what was admitted.

13 PRESIDING JUDGE: Are we showing the witness an exhibit or  
14 simply a copy?

14:35:21 15 MS HOLLIS: We can do whatever your Honours prefer. We can  
16 show her the exhibit or the copy, it's exactly the same.

17 PRESIDING JUDGE: The practice is to show the exhibit, so  
18 please show the witness the relevant exhibit, D-428.

19 MS HOLLIS: And if the witness could be allowed a moment to  
14:35:44 20 look at D-428 and then if that could be put on the overhead,  
21 please. And then if that could be put on the overhead, please.

22 Q. And, Ms White, is this a copy of one of the agendas that  
23 you provided to the Prosecution?

24 A. It is.

14:36:14 25 PRESIDING JUDGE: Madam Court Manager, why is the image so  
26 dark, the image on the public overhead?

27 MS IRURA: Your Honour, the writing on the copy is quite  
28 faint, so this could be a - contributing to the darkness of the  
29 image.

1 PRESIDING JUDGE: I don't think so. I don't think so.  
2 None of the copies that we have, whether the one under the tab 2  
3 or indeed exhibit D-428, none of them. There you are. It's  
4 suddenly brighter. Please continue.

14:37:01 5 MS HOLLIS: Thank you, Madam President.

6 Q. And this is the summary of the programme for that trip that  
7 you took in September of 1997 with Naomi Campbell?

8 A. It is.

9 Q. You indicated that you had been also given a copy of an  
14:37:20 10 itinerary for Ms Campbell herself. And if the witness could  
11 please be shown the document behind tab 3 of the binder of  
12 documents for this witness and Mia Farrow. And, Madam Witness,  
13 do you recognise this document?

14 A. I do.

14:37:52 15 Q. And what is this?

16 A. This is the itinerary that we were sent by the organisers,  
17 and on it, it has writing written by my PA as to the plane  
18 reference numbers that we were taking to South Africa, and the  
19 hotel.

14:38:18 20 Q. And, Ms White, when you say the itinerary "we were sent",  
21 who are you referring to when you say "we"?

22 A. Myself and Naomi Campbell.

23 Q. And when you say that it has writing written by "my PA",  
24 what do you mean by "PA"?

14:38:36 25 A. My secretary.

26 Q. And if we could look at the second page of this document,  
27 this is a two-page document, and do you recognise the second  
28 page as well, Ms White?

29 A. Yes, I do.

1 Q. And the handwriting on the second page, can you tell us  
2 whose handwriting that is?

3 A. My secretary's.

14:39:08

4 Q. Now, if we look at this document, we see under "Thursday  
5 25 September 1997", we see an entry that says, "Transfer to  
6 Presidential guesthouse in Pretoria." What does that refer to?

7 A. That refers to our transport to the guesthouse in Pretoria,  
8 President Mandela.

9 Q. And when you say "our transport", who is the "our"?

14:39:36

10 A. Naomi Campbell and myself.

11 Q. And can you describe this guesthouse for us?

12 A. It was an old, large, sort of baronial house. It had huge  
13 wooden gates. It was in a compound with big gardens. It had  
14 guards.

14:39:59

15 PRESIDING JUDGE: Sorry, you said a large sort of what  
16 house?

17 THE WITNESS: Sort of baronial or colonial. And you  
18 entered it by very large 10-foot, 12-foot wooden doors. There  
19 were sentries outside. And you went into a vast lounge area, and  
20 there was a staircase leading to a sort of galleried mezzanine  
21 floor area which seemed to have all the guest bedrooms. They  
22 looked over the lounge.

14:40:27

23 MS HOLLIS:

14:40:44

24 Q. And when you said that you entered it by very large  
25 10-foot, 12-foot wooden doors, are you talking about the entry  
26 into the guesthouse itself?

27 A. I am.

28 Q. And the floor that had the guest bedrooms, would that be  
29 the first floor - a ground floor and a first floor of the

1 building?

2 A. There was the first floor, and I believe the only floor  
3 above.

4 Q. So there was a ground floor and a first floor?

14:41:09 5 A. The ground floor had the lounge area, and the galleried  
6 area had all the bedrooms. It was very large.

7 Q. And if we - and do you recall - when you were transferred  
8 to this guesthouse, do you recall where your room was in this  
9 guesthouse?

14:41:32 10 A. At the top of the stairs, slightly to the right, looking on  
11 to the gardens.

12 Q. And do you recall where Naomi Campbell's room was?

13 A. Naomi Campbell's room, I believe, was either next door or  
14 next door but one, I can't quite recall, very close to my room.

14:41:54 15 Q. And what was the layout of the rooms themselves?

16 A. You entered into a small - well, you entered straight into  
17 a bedroom. They were large, but it was like a small little  
18 corridor area and a big bed.

19 Q. Now, the itinerary or the programme of events that we see  
14:42:17 20 for the 25th also talks about a 20-minute briefing by event  
21 organisers. Do you know what they're referring to there?

22 A. I don't recall it at all.

23 Q. And then it refers to, at 18:30, "Dinner with the President  
24 and other special guests." Do you recall the dinner?

14:42:38 25 A. I do recall the dinner.

26 Q. And where was the dinner held?

27 A. I believe in President Mandela's house in the compound.

28 Q. And President Mandela's house, was that the same building  
29 as the guesthouse or was it a separate house?

1 A. It was a separate house.

2 Q. Do you recall who attended this dinner?

3 A. Some of the people, yes.

4 Q. Please tell us who you recall as attending that dinner.

14:43:15 5 A. Myself, Naomi Campbell, Charles Taylor, President Mandela,  
6 Charles Taylor's Minister of Defence, not quite sure, Graca, who  
7 I don't recall being at the dinner but I now know she was, Mia  
8 Farrow, and various other people.

9 Q. And who was Graca?

14:43:51 10 A. President Mandela's fiancée at the time.

11 Q. And you say that Charles Taylor was at this dinner. Did  
12 you have occasion to meet Charles Taylor?

13 A. Yes.

14 Q. And when exactly did you meet him?

14:44:08 15 A. I met him at the dinner.

16 Q. And do you recall, was this before the dinner, during,  
17 after the dinner, or do you recall?

18 A. I think it might have been prior to the dinner but briefly.

19 Q. And do you recall how it was that you met him at that time,  
14:44:32 20 how that happened?

21 A. The only thing I recall is meeting him at the dinner. I  
22 did speak to him, just as an introduction. And I was seated  
23 three down from him.

24 Q. That was during the dinner?

14:44:55 25 A. Yeah.

26 Q. And when you met Charles Taylor, when you were introduced  
27 to him, do you recall how he was introduced?

28 A. No.

29 Q. Do you recall any comments about Mr Taylor's presence at

1 that dinner?

2 A. Yes. Naomi Campbell told me that Graca was quite annoyed  
3 that he'd been invited to the dinner.

4 Q. Did Ms Campbell explain to you why Graca was annoyed?

14:45:36 5 A. No.

6 Q. Now, you indicated that you were seated three down from  
7 Mr Taylor at the dinner. Do you recall who else was seated with  
8 you or who was seated next to you?

9 A. The minister, I believe it was the Minister of Defence, was  
14:45:52 10 seated on my left, and then it was Naomi Campbell next to him,  
11 and Charles Taylor.

12 Q. And so you have yourself, a person you believe was the  
13 Minister of Defence to your left, and then Naomi Campbell being  
14 next to that person; next to Naomi Campbell was Charles Taylor?

14:46:15 15 Is that your recollection of that seating?

16 A. That's my recollection.

17 Q. And do you remember the seating arrangement for anyone else  
18 at that dinner?

19 A. I think President Mandela was at the top of the table. I'm  
14:46:32 20 quite aware there were people opposite, but I don't recall the  
21 seating. I think Mia Farrow was vaguely opposite me, with her  
22 son.

23 Q. Do you remember the name of the son?

24 A. Not particularly. It might have been Marcus. I'm not  
14:46:51 25 sure.

26 Q. Do you recall any conversation that occurred during this  
27 dinner?

28 A. I was talking to the minister. I don't really recall  
29 particularly what we were talking about - Africa, I think - and



1 whilst we were eating, Naomi leant back and Charles Taylor leant  
2 forward, and Naomi was very excited and told me, "Oh, he's going  
3 to give me some diamonds." And that's really all I recall.

14:47:38

4 Q. You said that Naomi Campbell leaned back. What do you mean  
5 she leaned back?

6 A. She leaned back in her chair to talk to me.

7 Q. And you said that Mr Taylor leaned forward. What do you  
8 mean?

14:47:50

9 A. Well, he was leaning forward, and they were laughing and  
10 nodding, and he was agreeing that there was something - a gift  
11 coming of diamonds.

12 Q. And when Naomi Campbell told you this, you said she was  
13 very excited. "He's going to give me some diamonds." Did she  
14 say who this "he" was?

14:48:13

15 A. Oh, it was Charles Taylor.

16 Q. And at the time that she said that, were you able to  
17 observe Mr Taylor?

18 A. Yes.

19 Q. And at that time, what was he - what was he doing?

14:48:30

20 A. He was smiling and nodding in agreement.

21 Q. And were - during the dinner, were you able to observe the  
22 interaction between Ms Campbell and Mr Taylor?

23 A. Yes. They were being charming to each other.

24 Q. And what do you mean by that?

14:48:50

25 A. It's like mildly flirting.

26 Q. Do you recall --

27 PRESIDING JUDGE: I'm afraid I still don't understand.

28 What is "charming" or "mildly flirting"? What does that mean?

29 THE WITNESS: They're at a dinner party and they're just

1 being affable.

2 MS HOLLIS:

3 Q. So what was it you observed that has you use these words,  
4 which are descriptive words? What behaviour did you actually  
14:49:17 5 observe or what conversation did you observe?

6 A. It's just the way it was done. Naomi, I think, was  
7 flirting with him, and he was flirting back.

8 Q. And what were they doing to each other that you describe --

9 A. They were just enjoying each other's company.

14:49:37 10 Q. So can you tell us exactly what you saw or heard that makes  
11 you say they were flirting or enjoying each other's company? Are  
12 you able to give us a more concrete explanation?

13 A. I just heard them laughing and talking, but I can't recall  
14 the conversation.

14:49:54 15 Q. All right. Do you recall any photographs being taken  
16 before or after the dinner?

17 A. No.

18 Q. Now, you had mentioned Mia Farrow as someone who was at  
19 this dinner. When did you first meet Mia Farrow?

14:50:25 20 A. I don't really recall, but I think she was at the dinner  
21 with her son opposite me.

22 Q. And prior to this trip to South Africa and this dinner, had  
23 you ever met her before?

24 A. Not to my knowledge.

14:50:40 25 Q. How would you describe your relationship with Mia Farrow?

26 A. I don't have a relationship with Mia Farrow.

27 Q. Other than this dinner, do you recall any other occasion  
28 when you saw Mia Farrow?

29 A. No. Possibly on the train, but I don't recall it.

1 Q. Nelson Mandela, when did you first meet Nelson Mandela?

2 A. I met him in August '97.

3 Q. And how did you happen to meet him at that time?

14:51:26

4 A. I was on a trip with Naomi Campbell. She was doing an  
5 advertising shoot with David Bailey, and we met President  
6 Mandela, and I can't remember where but in Johannesburg, and we  
7 went to Soweto.

8 Q. So this was Johannesburg, South Africa?

9 A. That's correct.

14:52:00

10 Q. And after this dinner party, did you ever meet President  
11 Mandela again?

12 A. Yes, I did, in Barcelona.

13 Q. And when was that?

14:52:14

14 A. So sorry, I don't recall the date but quite a few years  
15 later.

16 Q. And other than the two trips to South Africa with Naomi  
17 Campbell that you have just described, did you take any other  
18 trips to South Africa with Naomi Campbell?

19 A. No, I don't recall.

14:52:32

20 Q. Does that mean that --

21 A. I don't. I didn't.

22 Q. So those two trips only?

23 A. Yes.

14:52:44

24 Q. Do you recall anything happening at the end of the dinner  
25 that night?

26 A. At the end of the dinner, everyone stood up and the  
27 minister and Charles Taylor and Naomi Campbell and myself - they  
28 were talking about how to get the diamonds to Naomi and I think  
29 briefly Charles Taylor was there and then left, and the minister

1 was discussing how to - that two men were going to collect them  
2 from Johannesburg which was I believe a couple of hours away and  
3 they were going to bring the diamonds to the guesthouse.

14:53:31 4 Q. Now, you've mentioned this minister several times. Do you  
5 recall the name of this minister?

6 A. No.

7 Q. Can you describe the minister for us?

8 A. He was African, Liberian. He - I believe he was in African  
9 dress and that's all I can say. And probably about 35, 40.

14:53:59 10 Q. Thank you. And who was actually engaged in this  
11 conversation about how the diamonds were going to be taken to  
12 Naomi Campbell?

13 A. The minister and Naomi, and Naomi would always have me  
14 there so that I could help organise anything, but it was pretty  
14:54:19 15 much taken care of.

16 Q. Did you actually take part in this conversation yourself?

17 A. I listened.

18 Q. And do you recall if it was arranged at what location these  
19 diamonds were to be brought?

14:54:33 20 A. The diamonds were to be brought to the guesthouse where  
21 Naomi Campbell was staying.

22 Q. After the dinner was over, where did you go?

23 A. We went back to the guesthouse.

24 Q. And when you say "we went back to the guesthouse", who do  
14:54:50 25 you mean?

26 A. Naomi Campbell and myself.

27 Q. And do you recall any events occurring after you went back  
28 to the guesthouse after dinner?

29 A. Yes. Naomi was very excited about these diamonds that were

1 about to arrive and we were sitting in the lounge area. I think  
2 it must have been around 10 o'clock at night, maybe a bit later,  
3 and we were waiting for these men to arrive. And she had - she  
4 was in communication with her phone, most likely by text. I  
14:55:38 5 believe she was in communication with the driver because - or it  
6 could have been anyone from that dinner party, I don't know, but  
7 somebody was informing her that the car was nearly there. And so  
8 on two occasions she told me, "Come on. Let's go and look in the  
9 garden." So we went out through the big doors, there was still  
14:56:05 10 sentries there, and we went to look in the garden, which was  
11 pitch black, we couldn't see anything and went back and then  
12 waited some more and then the same thing happened again. She  
13 said, "Oh, they're nearly - they're coming, they're coming." So  
14 we went back in the garden to see if we could see these people  
14:56:25 15 and then went back in the lounge. And it was getting late then  
16 and we had an early start, so we went to bed.

17 Q. Now, you said that she was in communication with someone.  
18 How did you know that?

19 A. Because she knew that the men were on their way and she  
14:56:46 20 kept telling me, "Oh, they're nearly here. They're nearly here."  
21 And each time we'd go in the garden.

22 Q. And at the time --

23 PRESIDING JUDGE: Excuse me. What is the significance of  
24 the garden?

14:57:02 25 THE WITNESS: Well, we were looking for the men.

26 MS HOLLIS:

27 Q. And this garden was where in relation to the entrance into  
28 the guesthouse?

29 A. Well, it was straight outside the main doors.

1 Q. And when she was saying that, "They're nearly here", and  
2 each time that you would go into the garden, did you observe  
3 whether she had any type of phone with her?

4 A. Yes, she had her phone with her.

14:57:30 5 Q. Were you actually present when she received any kind of  
6 phone call or text message, to your knowledge?

7 A. I was present, yes, but I don't recall if it was a phone  
8 call or a text, but she was in communication and getting  
9 information that these men were nearly there.

14:57:52 10 Q. Now, you indicated at some point you went up and you went  
11 to bed. Do you know what Naomi Campbell did?

12 A. No, Naomi and I both went up and went to bed, and I took  
13 her to her room, said goodnight, and everyone in the house had  
14 gone to bed. We were the last people to go to bed, so.

14:58:14 15 Q. And do you recall anything happening after you had gone to  
16 bed in your room?

17 A. Yes, I went into my room and I was about to get ready for  
18 bed and I heard some chink noises - chinky noises on my window,  
19 like somebody throwing pebbles at the window. So I - I went over  
14:58:40 20 to see what that was and I opened the window and looked down and  
21 there were two guys down on the ground and they - "We have  
22 something for Ms Campbell. We have something for Ms Campbell.

23 Can you let us in?" So I told them to wait and then I went to  
24 knock on Naomi's door and I told her that the guys with the  
14:59:13 25 diamonds had arrived and I didn't think we should let them in, as  
26 the house was quiet.

27 Q. And what happened then?

28 A. Well, she was in her nightdress and I told her to put her  
29 cashmere shawl on, which she did, and I told her she - if we did

1 actually let these guys in she mustn't offer them any alcohol and  
2 we have to be very careful. But I was confident because there  
3 were sentries outside the guesthouse I'd seen that evening.

4 However, when we went downstairs there were no servants at  
15:00:00 5 all in the kitchen area and the doors - the big wooden doors were  
6 bolted. So I didn't really want to let them in but she really  
7 wanted to let them in. So eventually I said to her, you know,  
8 just give them a soft drink and be as quick as we can.

9 Q. Now, Ms White, when you went downstairs you said there were  
15:00:25 10 no servants at all in the kitchen area. Was there anyone  
11 downstairs by these big wooden doors when you and Ms Campbell  
12 went down?

13 A. No, there was no one. And she helped me to open them,  
14 because they were bolted, and they were very heavy, so we opened  
15:00:44 15 them and there were no guards outside either. Anyway, the guys  
16 came in and they sat down in the lounge and we sat opposite them  
17 and gave them a Coca-Cola each and they then took out a quite  
18 scruffy paper and they handed it to Ms Campbell and said, you  
19 know, there were the diamonds. And she opened them and showed  
15:01:20 20 them to me and they were quite disappointing because they weren't  
21 shiny.

22 Q. Now, before we go forward on that, these two men that you  
23 let in and gave Coca-Cola and then they took out a scruffy paper  
24 and handed it to Ms Campbell, did you recognise either of these  
15:01:41 25 two men?

26 A. No.

27 Q. Can you describe them for us?

28 A. They were both quite big, powerful, African men.

29 Q. And what language did they speak when they came in?

1 A. English.

2 Q. And were you able to identify or observe any kind of  
3 accent?

4 A. I don't recall an accent.

15:02:05 5 Q. All right. And you said that the scruffy paper was given  
6 to Ms Campbell and she opened them and showed them to you and  
7 they were quite disappointing because they weren't shiny. Do you  
8 recall how many of these diamonds were in this scruffy paper?

9 A. Five or six, I believe.

15:02:31 10 Q. And then what happened after she showed you these diamonds?

11 A. She let me hold the paper and then afterwards I folded them  
12 up and gave them back to her. And we thanked the guys for  
13 bringing them and let them out and shut the big wooden doors and  
14 bolted them.

15:02:55 15 Q. Now, during the time that these two men were there in that  
16 lounge area, do you recall either of them saying anything other  
17 than telling Ms Campbell that - giving her the scruffy paper and  
18 telling her here were the diamonds? Do you recall them saying  
19 anything else?

15:03:13 20 A. I don't remember anything else.

21 Q. And then after these two men left and you shut and bolted  
22 these big doors, what happened after that?

23 A. Ms Campbell and I went to bed. She took the diamonds off  
24 with her and I went to bed, we went to sleep.

15:03:35 25 Q. And what was your reaction to this gift to Ms Campbell that  
26 night?

27 A. I was quite worried about the gift because if she took them  
28 with her and took them out of South Africa I believed it would be  
29 me that would have to carry them, and I knew that it was illegal



1 to take diamonds from South Africa out of the country.

2 Q. And how was it that you knew that?

3 A. I don't know how I knew it, but I did know it.

4 Q. So then you both went to bed, and do you recall any of the  
15:04:19 5 events of the next morning?

6 A. I recall telling Naomi the next morning that we shouldn't  
7 take these diamonds and we should actually do something good with  
8 them and give them to the children's charity. And she eventually  
9 agreed that would be a good idea, that maybe they could benefit  
15:04:50 10 from the value of the diamonds.

11 Q. Now, Ms White, you said when you saw these diamonds that it  
12 was disappointing, they were disappointing. Were you able to  
13 observe or hear Ms Campbell's reaction to these diamonds when she  
14 looked at them?

15:05:11 15 A. When the men had given them to her she wouldn't be rude  
16 about the diamonds, but we both discussed when they'd gone that  
17 they were not very impressive. They weren't enormously big, but  
18 we had both never seen uncut diamonds.

19 Q. Now, you said that the next morning you told Naomi that you  
15:05:37 20 shouldn't take the diamonds and you should actually do something  
21 good with them and she eventually agreed it would be a good idea  
22 to give them to the children's charity. Do you know what  
23 Ms Campbell did with these diamonds?

24 A. Yes. When we were on the Blue Train we went - that's  
15:06:01 25 myself and Ms Campbell went to visit Jeremy Ractliffe in his  
26 carriage. I would think that would have been after the lunch on  
27 the Blue Train and he was in his carriage with his wife and Naomi  
28 told him the story, how she'd received the diamonds from  
29 Charles Taylor and knew that they shouldn't be taken out of

1 South Africa and felt it would be a good idea to give them -  
2 donate them to the children's charity.

3 Q. To your knowledge, at that time what was Mr Ractliffe's  
4 position?

15:06:45 5 A. He was a chairman of the Nelson Mandela children's charity.

6 Q. And when Ms Campbell gave him these diamonds, did you  
7 actually see the diamonds at that time?

8 A. I think they were in a pouch then and I didn't - I don't  
9 recall seeing them at that time.

15:07:06 10 Q. Do you know how many diamonds Ms Campbell gave to  
11 Mr Ractliffe on that occasion?

12 A. I don't.

13 Q. And what was Mr Ractliffe's reaction when Ms Campbell gave  
14 him these diamonds?

15:07:19 15 A. He was quite shocked and looked quite horrified. He didn't  
16 want them but she said, "Well, I can't take them out of the  
17 country and it could do some good." So reluctantly he did take  
18 the diamonds.

19 Q. You said that he didn't want them. How did you know that  
15:07:46 20 he didn't want them?

21 A. He looked very uncomfortable to accept these diamonds.

22 Q. And did he say anything to Ms Campbell about accepting  
23 these diamonds?

24 A. First he was like, "Well, no, no, I don't want them, no."  
15:08:02 25 Both her and myself pressed him to take them, because what could  
26 we do with them? We couldn't take them legally out of  
27 South Africa, and she was convinced that they would do some good  
28 for the children that she was there trying to help with the  
29 charity.

1 Q. Now, when he said he didn't want them, did he explain to  
2 you why he didn't want these diamonds?

3 A. No. I think that we explained to him that we knew it was  
4 bad to take them out of South Africa and that he could do  
15:08:44 5 something perhaps better with them, but I don't recall him  
6 explaining any more than knowing that we shouldn't take them out  
7 - the diamonds out of South Africa.

8 Q. On this occasion in the Blue Train when you and Naomi  
9 Campbell went to Jeremy Ractliffe and Ms Campbell gave him the  
15:09:04 10 pouch, had you ever met Jeremy Ractliffe before that time?

11 A. Yes.

12 Q. And when was that?

13 A. I met him in August when I was there with Naomi Campbell  
14 and David Bailey, and we visited Soweto, and I think he helped  
15:09:24 15 arrange that, and we also met with President Mandela.

16 Q. And do you recall if there were any photographs taken on  
17 that occasion when you were with Jeremy Ractliffe and met with  
18 President Mandela?

19 A. Yes, there was photographs taken of Naomi, myself, Jeremy  
15:09:44 20 Ractliffe, and someone who I don't remember.

21 MS HOLLIS: Madam President, could I ask, before I move on  
22 to another document, could I ask that the document behind tab 3,  
23 Blue Train Launch, Programme of Events for Ms Naomi Campbell be  
24 marked for identification.

15:10:07 25 PRESIDING JUDGE: That is in fact exhibit D-428.

26 MS HOLLIS: I thought --

27 PRESIDING JUDGE: According to my records --

28 MS HOLLIS: -- it was an unmarked summary of programme.  
29 Perhaps I have that wrong.

1           PRESIDING JUDGE: Mr Anyah, you remember the document that  
2 was shown to the previous witness, MFI-14.

3           MR ANYAH: Yes, Madam President. That document is actually  
4 the document behind tab number 2, which is Summary of Programme,  
15:10:39 5 the Blue Train; it is not the document which counsel now wishes  
6 to be marked for identification, which is behind tab number 3.

7           PRESIDING JUDGE: Very well. Very well. The document  
8 behind tab number 3, which is entitled "Blue Train Launch  
9 Programme of Events for Ms Naomi Campbell" is marked MFI-11.

15:11:05 10           MS HOLLIS: Thank you, Madam President. And if the witness  
11 could please be shown the document, which is behind tab 1 in the  
12 binder of Prosecution documents for Carole White and Mia Farrow,  
13 and if that could be put on the overhead, please.

14 Q. And, Ms White, do you recognise that photograph?

15:11:53 15 A. Yes, I do.

16 Q. And what is that photograph?

17 A. It's a photograph taken by David Bailey of President  
18 Mandela signing a book, and I'm there, Naomi's there, and Jeremy  
19 Ractliffe's there.

15:12:14 20 Q. And you've mentioned a David Bailey. Who was David Bailey?

21 A. David Bailey's a photographer from England.

22 Q. And, Madam Witness, at this time I would ask that you be  
23 given this document, and if you would please draw an arrow to  
24 each person that you recognise and then write their name above

15:12:36 25 that arrow. And if you would, at the bottom of that photograph,  
26 Ms White, if you would sign your name and put today's date, which  
27 is the 9th of August 2010. And then, Ms White, if you could  
28 please move to the chair that the bailiff is in at this time, and  
29 then if you could show us what you have identified on that

1 photograph; if you could use a pen to show us what you have  
2 identified on that photograph. Yes, please, if you would - you  
3 will see --

15:14:07 4 A. Okay. There's me, Carole White; President Mandela; a  
5 gentleman whose name I don't recall; Jeremy Ractliffe, and Naomi  
6 Campbell.

7 Q. Thank you very much. And, Madam President, I would ask  
8 that this be marked for identification.

9 PRESIDING JUDGE: The document 5019-A is marked MFI-12.

15:14:31 10 MS HOLLIS:

11 Q. Now, after this event in September of 1997, and after  
12 Ms Campbell had given Jeremy Ractliffe a pouch with what you  
13 understood to be diamonds in it, did you ever have contact with  
14 Jeremy Ractliffe again after that?

15:14:48 15 A. I don't recall having contact with him, apart from email or  
16 letter.

17 Q. And the emails or letters contact, you recall that you did  
18 have such contact, or you don't know?

19 A. I don't really remember but I believe we did have contact  
15:15:16 20 by letter, fax probably at that time.

21 Q. And do you recall what the purpose of that contact would  
22 have been?

23 A. Probably thanking me for my help and my assistant's help.

24 Q. Ms White, you said that you worked with Ms Campbell as her  
15:15:34 25 model agent until about 2006. Do you continue to represent  
26 Ms Campbell today?

27 A. I don't.

28 Q. Is there in fact a lawsuit between the two of you today?

29 A. There is.

1 Q. And without going into the merits or details of that  
2 lawsuit, I would ask you, is Mia Farrow mentioned in that  
3 lawsuit?

4 A. She's not.

15:15:58 5 Q. Is she a part of that lawsuit in any way?

6 A. None whatsoever.

7 Q. And Ms Campbell has counter-sued you. Correct?

8 A. Correct.

9 Q. Is Mia Farrow mentioned in that counter-suit at all?

15:16:11 10 A. No.

11 Q. Is she a part of that counter-suit in any way?

12 A. No.

13 Q. The lawsuit and the counter-suit, does it have anything to  
14 do with the diamonds?

15:16:24 15 A. No.

16 MS HOLLIS: Madam President, I have no further questions  
17 for the witness.

18 PRESIDING JUDGE: Mr Griffiths, please.

19 CROSS-EXAMINATION BY MR GRIFFITHS:

15:16:45 20 Q. Ms White, did you watch the testimony of Naomi Campbell  
21 last Thursday?

22 A. I did not. I saw two snippets on the news.

23 Q. Weren't you interested in what she was going to say about  
24 you?

15:17:03 25 A. At the time she was testifying I had other things to do and  
26 I was not in my - I was not near a television.

27 Q. Weren't you interested in what she had to say about you?

28 A. Very interested, but I couldn't see the whole testimony,  
29 only what was put on the news.

1 Q. Sky Television, which is available in the UK --

2 PRESIDING JUDGE: Sorry, could I ask first of all what news  
3 you saw the snippets on?

15:17:49

4 THE WITNESS: BBC News and maybe Sky, but I was out that  
5 evening as well, so I just saw little bits.

6 MR GRIFFITHS:

7 Q. Sky showed it live in the morning, along with BBC News; and  
8 Sky showed it all again that night, and you still didn't get a  
9 chance to watch it?

15:18:08

10 A. No, I was not around. I was shopping with my son in the  
11 morning when Naomi Campbell was testifying, and I know it was on  
12 live, because people were calling me; and in the evening I was  
13 out at a dinner party.

14 Q. What did Naomi Campbell say about you last Thursday,  
15 Ms White?

15:18:29

16 A. I know Naomi Campbell, from news reports, called me a liar.

17 Q. We'll come back to the question of whether you're a liar in  
18 a moment, but before we do that, have you got any particular  
19 plans for this evening, Ms White?

15:18:55

20 A. No. I was thinking I might be on a plane back to London.

21 Q. Are you not due to be interviewed live on the Anderson  
22 Cooper show for CNN tonight?

23 A. I know Anderson Cooper would like to interview me tonight  
24 but he won't be.

15:19:20

25 Q. Were you supposed to be interviewed on the Anderson Cooper  
26 show live tonight?

27 A. It was a possibility.

28 Q. Were arrangements not made for you to appear on that show  
29 live tonight, Ms White?

1 A. Not by me, no.

2 Q. So what is your connection with this Anderson Cooper show?

3 A. I don't have a connection.

4 Q. Can I have a straight answer. Were you meant to appear on

15:19:58 5 that show tonight --

6 MS HOLLIS: I object to that. The witness gave an answer.

7 And I object to the characterisation of that question.

8 PRESIDING JUDGE: I'm not satisfied by the answer yet.

9 Please ask.

15:20:12 10 MR GRIFFITHS: That's why I'm trying to ask her a straight

11 question.

12 Q. And my straight question is: Were you supposed to appear

13 on the Anderson Cooper show tonight?

14 A. I know that Anderson Cooper requested that I would appear

15:20:31 15 on that show. I also know that the BBC requested that I would

16 appear on one of their programmes. Many people have asked me to

17 appear on TV tonight, including ABC, and Al Jazeera.

18 Q. Ms White, I'm going to try once more: When Anderson Cooper

19 made that request, did you agree?

15:20:59 20 A. I did not agree. My attorney might have agreed, but I

21 didn't agree. It was a possibility that I might have been on

22 that show.

23 Q. Your attorney might have agreed on your behalf. How do you

24 know that?

15:21:19 25 A. My attorney told me that they had requested my appearance

26 on a show. Nothing was confirmed. I told him that I did not

27 want to go on a show until the trial was over and I still wasn't

28 sure whether I would.

29 Q. How do you know --



1 PRESIDING JUDGE: Sorry, was that until the trial is over  
2 or until your testimony is over?

3 THE WITNESS: Until the testimony was over. But I still  
4 was not sure. I hadn't made my mind up if I would even do that,  
15:21:57 5 I don't particularly enjoy doing interviews.

6 MR GRIFFITHS:

7 Q. How do you know your attorney may have agreed on your  
8 behalf that you would go on the show?

9 A. My attorney was contacted by Anderson Cooper and they  
15:22:14 10 requested that I might go on their show. My attorney asked me if  
11 I would go on the show and my answer to him was, "I'm not sure if  
12 that's something I want to do. I'd like to see what happens if"  
13 - "at the end of the testimony how I feel." But I was undecided.

14 Q. Ms White, let me try once more. A few minutes ago, in  
15:22:41 15 answer to one of my questions, you said this: "My attorney might  
16 have agreed, but I didn't agree." How do you know that your  
17 attorney might have agreed? It's a very simple question?

18 A. Well, my attorney was relaying an invite for me to go on a  
19 show. He asked me --

15:23:06 20 Q. Ms White, I'm going to interrupt you. How do you know that  
21 your attorney might have agreed on your behalf? It's a simple  
22 question, and I would like a very simple answer.

23 A. Well, I don't know that actually.

24 Q. So why did you tell these judges that a few minutes ago?

15:23:24 25 A. Because he might have but he hadn't got my permission to do  
26 so, and I believe he was asking me the question whether I would  
27 go on the show or not.

28 Q. How do you know he might have? It's a very simple  
29 question. Are you trying to evade my questions, Ms White?

1 A. No, I'm not. I - most certainly not. My attorney told me  
2 that Anderson Cooper had asked if he could give - do an interview  
3 with me, and he --

4 Q. How do you know he might have agreed? Simple question.

15:24:00 5 A. I don't know.

6 Q. So why did you tell the judges that a few minutes ago, if  
7 you don't know?

8 A. Well, he might --

9 Q. Are you in the habit of saying things you don't know about?

15:24:10 10 MS HOLLIS: I'm going to object on two bases. The first  
11 basis is he's interrupting the witness's answer. The second  
12 basis is an attorney from either side may ask difficult  
13 questions, but they may not be disrespectful or harass a witness,  
14 and I object to the tone of voice and the level of voice he is  
15:24:27 15 using in this questioning.

16 PRESIDING JUDGE: Yes, Mr Griffiths. There is no need to  
17 raise your voice at the witness, really. That can be quite --

18 MR GRIFFITHS: [Microphone not activated].

19 PRESIDING JUDGE: Let me finish. Let me finish. That can  
15:24:40 20 be quite intimidating to the witness. Now, I do appreciate that  
21 you've asked many questions around this area, and perhaps the  
22 witness has not answered in exactly the way you'd want to, but  
23 please, keep your tone down.

24 And if we can just revert back to the question, the  
15:25:01 25 relevant question.

26 MR GRIFFITHS:

27 Q. How do you know your attorney might have agreed? Simple  
28 question.

29 A. My attorney was contacted by Anderson Cooper, who wanted me

1 to be on his TV show. My attorney asked me if it's something I  
2 wanted to do. I was unsure. I'm just saying that my attorney  
3 might have told Anderson Cooper that I might go on his show, but  
4 I have not agreed to.

15:25:41 5 Q. Ms White --

6 PRESIDING JUDGE: Ms White, did your attorney actually say  
7 yes to Mr Cooper on your behalf? Do you know that?

8 THE WITNESS: I don't believe so, because he'd have to have  
9 my permission, but he possibly indicated that I might be  
10 interested to go on the show.

15:25:59

11 MR GRIFFITHS:

12 Q. How do you know that?

13 A. Well, he's my attorney and he was asked if I'd go on the  
14 show, and he would have said to them he would see whether I  
15 wished to be interviewed, and when he asked me, I was unsure  
16 whether I would go on the show or not.

15:26:19

17 Q. Ms White, did your attorney say to you, "Carole, guess  
18 what? I've told Anderson Cooper that you might appear on their  
19 show?" Did he say that to you?

15:26:41

20 A. He might have said that to me.

21 Q. Finally.

22 PRESIDING JUDGE: No, no, no.

23 MS HOLLIS: I object.

24 PRESIDING JUDGE: No. Ms White, did your lawyer say that  
25 to you or didn't he?

15:26:51

26 THE WITNESS: Well, my lawyer had said really pretty much,  
27 I guess, what that gentleman's just said, that he told them that  
28 I might appear on the show and he would ask me.

29 PRESIDING JUDGE: So the answer, in short, is yes?

1 THE WITNESS: I guess so, but it wasn't yes from me is what  
2 I'm trying to say.

3 MR GRIFFITHS:

4 Q. Who is Annie Wilshire?

15:27:30 5 A. Annie Wilshire is one of my booking agents.

6 Q. Based where?

7 A. In London.

8 Q. Did you have a blood diamond party in your offices last  
9 Friday night?

15:27:49 10 A. Not that I know of.

11 Q. According to Annie Wilshire's Facebook page, you did. Do  
12 you want to have a look at some of the photos?

13 A. I don't --

14 Q. Let me ask you the question again, Ms White. Did you have  
15:28:13 15 a blood diamond party in your offices last Friday night?

16 A. No.

17 Q. Didn't you?

18 A. No. It was my brother's birthday last Friday night.

19 Q. Were you in company with Annie Wilshire last Friday night?

15:28:35 20 A. I was at my office until 6.30, 7.00 last Friday night, and  
21 then I went for drinks with my brother in Covent Garden.

22 PRESIDING JUDGE: That really doesn't answer the question,  
23 which, in my view, was quite simple.

24 THE WITNESS: Yes, I was with Annie Wilshire.

15:28:58 25 MR GRIFFITHS:

26 Q. Thank you. Was there any difficulty in answering the  
27 question in that way, that "I was with Annie Wilshire"?

28 A. No, there's no difficulty in that. Just the blood diamond  
29 party, I don't understand.

1 Q. Did you have drinks in company with Annie Wilshire last  
2 Friday night which you styled as a blood diamond party? Yes or  
3 no?

4 A. I had drinks with Annie Wilshire, and I don't - have never  
15:29:27 5 styled anything as a blood diamond party.

6 Q. I want you to have a look at this photograph, please.

7 PRESIDING JUDGE: In the meantime, could we have a spelling  
8 for that surname, Annie's surname, please.

9 MR GRIFFITHS: W-I-L-S-H-I-R-E. And the first name is  
15:29:46 10 A-N-N-I-E. I'm sorry, I only have the one copy at the moment.  
11 Can we put that on the overhead, please?

12 MS HOLLIS: Could I see that first, please? I have not  
13 seen this. I don't know what he's talking about.

14 MR GRIFFITHS: My apologies. I'm told by my case manager  
15:30:18 15 that we do have copies. So can I hand in four copies for your  
16 Honour and a copy for my learned friend? I have further copies  
17 if anyone needs one.

18 PRESIDING JUDGE: We might need one for the overhead. Can  
19 you please put one on the overhead? Sorry?

15:31:36 20 MS IRURA: Your Honour, a moment is needed for the machine  
21 to come on.

22 MR GRIFFITHS:

23 Q. Ms White, do you recognise the individuals shown in this  
24 photograph?

15:31:50 25 A. Yes.

26 Q. Are they employees of you?

27 A. Yes.

28 Q. Is this a photograph taken last Friday night?

29 A. No.

1 Q. When was this taken?

2 A. Thursday night.

3 Q. Ah. So was the blood diamond party on the Thursday night,  
4 the night after Naomi Campbell gave evidence?

15:32:19 5 MS HOLLIS: I'm going to object to the way this was phrased  
6 as well. This witness has said repeatedly that she doesn't know  
7 anything about a blood diamond party and that she didn't have a  
8 blood diamond party.

9 PRESIDING JUDGE: Ms Hollis, this is cross-examination. If  
15:32:36 10 counsel wants to put a proposition, the witness is perfectly  
11 capable of responding appropriately. The question may be put as  
12 asked.

13 MR GRIFFITHS: I'm grateful.

14 Q. Was the blood diamond party on the Thursday night,  
15:32:48 15 Ms White?

16 A. I'm sorry, this was a party on the Thursday night, 5  
17 August, and it was a party to a new house we've bought for - to  
18 put our models in. It's nothing to do with a blood diamond  
19 party.

15:33:15 20 PRESIDING JUDGE: Sorry, the witness said it was party to  
21 new house? What does that mean?

22 THE WITNESS: We bought a new house to accommodate models  
23 that come to London, and this was the first time my team of  
24 bookers had got to see the new house, and that's why we were  
15:33:34 25 there.

26 PRESIDING JUDGE: And this was at the new house?

27 THE WITNESS: Yes.

28 MR GRIFFITHS:

29 Q. And did anyone at this party on the Thursday night refer to

1 it as a blood diamond party?

2 A. Not to my knowledge. I really have no idea about that.

3 Q. Or a blood diamond night?

4 A. No.

15:34:04 5 Q. Well, have a look at this photograph, then. What you have  
6 there is a blow-up of this, and there's a caption underneath it.  
7 Have a look.

8 I have copies for your Honours and the witness.

9 What's the caption, Ms White?

15:35:12 10 A. The caption is "Annie Wilshire's photos, blood diamond  
11 night."

12 Q. "Blood diamond night" is the caption to a photograph taken  
13 of a party held last Thursday night at a new house opened by you;  
14 is that right?

15:35:33 15 A. Correct.

16 Q. Can you be seen in this photograph?

17 A. Yes, I'm at the back.

18 Q. Right. So what I'd like you to do now, please, as you were  
19 asked to do by Ms Hollis, I'd like you to go through that  
15:35:50 20 photograph, the larger version, and I'd like you to put arrows  
21 and names to the people we can see. All right. Thank you. I  
22 wonder if you'd mind changing places for a moment and just taking  
23 us through the individuals you've named.

24 A. Do you want me to name them?

15:37:10 25 Q. Yes, please.

26 A. Annette Koonjeam, Carol e White, Sissy Best, Paul Hunt,  
27 Mariella Kroell, Annelou Jennings.

28 Q. Before I forget, could you put today's date and sign the  
29 back of that photograph, please.

1 PRESIDING JUDGE: Could you please put the picture back on  
2 the overhead. We want to see the people that she wrote.

3 Sorry, the lady who appears as Pamelon, what is her  
4 surname?

15:38:37 5 THE WITNESS: Sorry?

6 PRESIDING JUDGE: Pamelon, the lady on the right-hand side  
7 most of the photo. What's her name?

8 THE WITNESS: Annelou Jennings.

9 PRESIDING JUDGE: Ms Annie Wilshire is not in this  
10 photograph, is she?

11 THE WITNESS: No.

12 PRESIDING JUDGE: And Paul's surname is what?

13 THE WITNESS: Hunt.

14 PRESIDING JUDGE: Okay. We've taken note.

15:40:00 15 MR GRIFFITHS: Very well.

16 Q. Now, does it surprise you, Ms White, that an employee of  
17 you coincidentally last Thursday night describes an event which  
18 you attended as a "blood diamond night"? Does that surprise you?

19 A. Yes, it does.

15:40:21 20 Q. And was there any discussion about the evidence of  
21 Ms Campbell at this gathering which you attended?

22 A. I'm sure that there was some discussion about Naomi  
23 Campbell's testimony. However, as I said, I hardly saw it and it  
24 wasn't a party about that. It was showing my bookers where their  
15:40:53 25 models were going to live, and it was after work and we had some  
26 bottles of fizzy wine and pizza and I was talking mainly about  
27 work to a lot of my colleagues. It doesn't surprise me - it does  
28 surprise me, that terminology, because I'm not crass enough to  
29 arrange a party like that. That would be absurd.



1 Q. What about a member of your staff saying something like  
2 this in response to what an inconvenience, a quote from  
3 Ms Campbell's testimony last Thursday, this is said:

15:41:48 4 "That is the Campbell line. When she said that, the whole  
5 agency laughed. Wait for Carole to bring her down on Monday at  
6 The Hague."

7 Does that surprise you?

8 A. It does surprise me in a way. As I said, I was not there  
9 when she was testifying but I do know that the whole of my office  
15:42:10 10 was watching it on the live Sky link. And I don't really know  
11 why she would say that.

12 Q. Well, just so that you don't believe - believe that I am  
13 lying to you, have a look at this --

14 PRESIDING JUDGE: Incidentally, Ms White, what time was  
15:43:12 15 this party?

16 THE WITNESS: The party was at 7 and finished at 9.30.

17 MR GRIFFITHS:

18 Q. Do you recognise this as being a Facebook page, Ms White?

19 A. I do.

15:43:40 20 Q. Do you see just below the photos --

21 PRESIDING JUDGE: Excuse me, we don't have enough copies.  
22 I certainly don't have a copy of this.

23 MR GRIFFITHS:

24 Q. "Jeanna Ridout, what an inconvenience. Friday at 11.05  
15:44:33 25 a.m." 11.05 a.m. The UK is one hour behind The Hague, so that's  
26 10 o'clock here in The Hague. So at that time would your  
27 employees be in the office?

28 A. 11.05 on Friday morning, yes.

29 Q. It would be 12 in The Hague, I'm sorry. My fault. It

1 would be 12 in The Hague. I've got it the wrong way around.

2 Would all your employees be in the office by midday?

3 A. Yes.

4 Q. So let's just see what's happening, shall we? Jeanna

15:45:21 5 Ridout, is she an employee of yours?

6 A. She used to be, but that's being used by someone else. I  
7 guess. Actually, sorry, it's Facebook, isn't it?

8 Q. Mm-hm.

9 A. Yeah, yes, she is an ex-employee.

15:45:36 10 Q. So we've got an ex-employee who was communicating with a  
11 current employee, Annie Wilshire, and Wilshire says, "That is the  
12 Campbell line. When she said that the whole agency laughed.  
13 Can't wait for Carole to bring her down on Monday at The Hague."  
14 Now, would you have been in the office at this time last

15:46:08 15 Thursday?

16 A. I thought this was Friday, isn't it?

17 Q. Would you have been in the office last Friday?

18 A. Yes.

19 Q. And were you in the office on the Thursday?

15:46:21 20 A. Yeah - no, not all day.

21 Q. When were you in the office on the Thursday?

22 A. On the Thursday I wasn't in the office till after lunch.

23 Q. And when you got in after lunch did your employees say to  
24 you, "Guess what, Carole, you should have been watching that

15:46:46 25 Naomi Campbell this morning. We were all laughing"? Anything  
26 said like that to you when you got in?

27 A. Well, they couldn't understand why I hadn't watched it.

28 But I don't really recall, but it was a source of great interest  
29 to my employees.

1 Q. And they mentioned that fact to you?

2 A. What fact?

3 Q. That they'd been watching and what Naomi had said?

4 A. Yes.

15:47:19 5 Q. Thank you. "Jeanna Ridout, I have the diamonds." "Annie  
6 Wilshire, Kidney stones." "I hear that's what happens in  
7 Liberia." This was a topic of major conversation in your office,  
8 wasn't it?

9 A. Well, I don't know, because I don't use Facebook but I can  
15:47:45 10 see that it obviously was on Facebook.

11 Q. Ms White, Naomi Campbell was perhaps your biggest, highest  
12 paying contract until you parted, wasn't she?

13 A. Yes.

14 Q. And you've taken a lawsuit out against her which is worth  
15:48:17 15 many millions of dollars if you succeed. Isn't that right?

16 A. Possibly, yes.

17 Q. Because the contract you had signed with Naomi Campbell for  
18 the distribution of scents and other cosmetics bearing her name,  
19 you got 25 per cent of everything she earned under that contract,  
15:48:45 20 didn't you?

21 A. Yes.

22 Q. And so consequently, when the contract was terminated you  
23 were losing between \$300,000 and \$500,000 a year, weren't you?

24 A. I'm not sure, but I was losing about 300 I would say.

15:49:06 25 Q. About 300,000 a year?

26 A. Uh-huh.

27 Q. 300,000 a year for how many years?

28 A. Well, the contract was abruptly stopped I think in 2008.

29 PRESIDING JUDGE: What would be the answer to the question,

1 300,000 a year for how many years?

2 THE WITNESS: Oh, you want to know how many years? About  
3 10 or 11 years.

4 MR GRIFFITHS:

15:49:43 5 Q. So you're - I want to be sure I understand. You're owed  
6 something like ten times 300,000?

7 A. No.

8 Q. What are you owed?

9 A. I'm probably owed about 600,000.

15:50:07 10 Q. Are you sure?

11 A. Yeah. I was paid my royalties until - I'm not a hundred  
12 percent sure of the dates, but I think about until August 2008.

13 Q. Now, I want you --

14 JUDGE DOHERTY: Mr Griffiths, I'm not clear. Was this  
15:50:28 15 contract made to run for a period of 10 or 11 years from  
16 beginning to end, or had it run 10 to 11 years before it was  
17 terminated?

18 THE WITNESS: It had run about 11 years and the contract  
19 was beneficial to both Naomi Campbell and myself as long as the  
15:50:52 20 company who produced the perfume wanted the contract to go on.  
21 So there were, I believe, five-year renewals and it kept being  
22 renewed, and so it could go on for another 20 years.

23 MR GRIFFITHS:

24 Q. So what is the true position, Ms White? For how many  
15:51:24 25 years' worth of lost royalties are you suing Naomi Campbell?

26 A. Well, at the moment for the last two years.

27 Q. That's all?

28 A. And to have the contract put back to where it was. She's  
29 just stopped paying my business - she's broken the contract, if

1 you like.

2 Q. Ms White, let me be quite straight with you. I am asking  
3 you these questions because I'm going to suggest in due course  
4 that you have a very powerful motive for lying about Ms Campbell.  
15:52:10 5 That's why I want to know what's this worth to you. So help us.  
6 How many years' worth of royalties do you expect to get if you  
7 win this lawsuit?

8 A. I expect to get the two years that have not been paid and  
9 any future years that the perfume continues to be produced. So  
15:52:40 10 it's how long is a piece of string. I would expect another 10,  
11 maybe even 20 years of royalties because the contract goes with  
12 the perfume. As long as the perfume's produced, the contract  
13 goes with it.

14 Q. So the reality of the situation is you're not looking to  
15:53:04 15 just get \$600,000, you're looking for much, much more than that,  
16 aren't you?

17 A. I'm looking for the contract to be resumed, yes.

18 Q. You're looking for much, much more than that, aren't you?

19 A. Yes.

15:53:18 20 Q. Thank you. Because I suggest, you see, that you don't come  
21 to this Court with clean hands, you come with an agenda. Do you  
22 follow me?

23 A. I follow your train of thought, yes.

24 Q. And I suggest that your motive in lying about Naomi  
15:53:43 25 Campbell is to provide you with ammunition for use against her in  
26 the lawsuit.

27 A. That's not true.

28 Q. Well, help me with this then. I have here a copy of  
29 interview notes conducted with you on the 13th of May, and I'd

1 I like you to keep this in front of you, because we'll be referring  
2 to various aspects of it in due course.

3 PRESIDING JUDGE: Mr Griffiths, please remind me what tab  
4 the interview notes are under.

15:54:26 5 MR GRIFFITHS: Your Honours should have this as part of the  
6 - as an appendix to the motion filed by the Prosecution. I'm  
7 also told that they're in tab 12 of the bundle served by Mr Anyah  
8 this morning.

9 PRESIDING JUDGE: Mr Griffiths, under or behind tab 11 we  
15:55:27 10 have the interview notes dated 13 May 2010.

11 MR GRIFFITHS: That's what I'm directing the witness's  
12 attention to.

13 Q. Now, Ms White, I hope I have made my position abundantly  
14 clear, and why I make that suggestion is this - let's have a  
15:55:56 15 look, please, for now, at page 4, paragraph 17.

16 Now, before we come to look at that paragraph, Ms White, do  
17 you recall being interviewed on the 13th of May of this year by  
18 Nicholas Koumjian and Ruth Mary Hackler, lawyers working for the  
19 Prosecution in this case?

15:56:25 20 A. Yes.

21 Q. And this was in London, was it not?

22 A. Yes.

23 Q. Let's have a look at paragraph 17:

24 "The witness is currently in litigation against Ms Campbell  
15:56:41 25 over a contract dispute. The witness did not even know Mr Taylor  
26 was on trial until her attorney, in the breach of contract  
27 matter, contacted her back in January or February after seeing  
28 something in the news about Naomi Campbell and a blood diamond.  
29 He asked the witness if she knows anything about that and the

1 witness told him the story of what had happened. He urged her to  
2 come forward because it might be important."

3 Why did your lawyer think it might be important for you to  
4 come forward with this story?

15:57:26 5 A. My lawyer asked me, I think in January, if what I knew  
6 about Naomi Campbell - did I know anything about Naomi Campbell  
7 and the blood diamond, and I emailed him back saying yes, I do,  
8 and told him the story of my visit to the President Mandela's  
9 guesthouse and on the Blue Train with Naomi Campbell, and I told  
15:58:02 10 him the story of the diamonds. At the time he told me about that  
11 I had no idea that there was a trial --

12 Q. Ms White, can I interrupt you?

13 A. Yeah.

14 Q. My question was very simple, and I wasn't asking you for a  
15:58:21 15 recitation of what you've told us already. Why did your lawyer  
16 think it might be important for you to go public with this story?

17 A. He thought it was important for me to go public with the  
18 story, when he realised that it was important to this trial, and  
19 he asked me if he could contact the Prosecution.

15:58:52 20 Q. Ms White, did your lawyer say to you, "This could assist  
21 you in your claim against Naomi Campbell, so let's go public"?

22 A. No.

23 Q. Are you telling us the truth about that?

24 A. I am totally telling you the truth. No, he did not.

15:59:13 25 Q. So tell me then, Ms White, when it comes to that lawsuit in  
26 New York, I'm sure, in light of what you've just told us, you'll  
27 tell your lawyer, "Don't bring up this story about the blood  
28 diamonds and Naomi Campbell when you're cross-examining her."  
29 You're going to do that, aren't you, because this isn't important

1 to your claim; is that fair?

2 A. I really don't actually understand what you're saying, I'm  
3 sorry.

15:59:44

4 Q. I'm saying: Are you going to say to your lawyers, when you  
5 go to Court in New York: "Do not mention blood diamonds to Naomi  
6 Campbell." Are you going to do that?

7 A. Why would we mention it in a business contract dispute?

8 Q. Right. So you're not going to mention it?

9 A. I don't see how it's relevant.

16:00:00

10 Q. You see, I'm suggesting, and I'll be quite blunt with you,  
11 you are not being totally frank with this Court at all. You know  
12 full well why your lawyer told you that it might be important;  
13 you know full well, and you're not telling these judges the  
14 truth. Do you understand what it is I'm suggesting to you?

16:00:24

15 A. No.

16 Q. I'm suggesting that you're not telling these judges the  
17 truth about why you decided to come forward. Do you follow?

18 A. You are suggesting that, but it's just not true.

16:00:48

19 MR GRIFFITHS: Before I forget, Madam President, can I ask,  
20 please, that the photograph marked by the witness be marked for  
21 identification, and I would like the large photograph, the one  
22 with the caption and the Facebook page, to have the same MFI  
23 number but be classed as A, B and C, please.

16:01:28

24 PRESIDING JUDGE: The large photograph, as marked by the  
25 witness, accompanied by the smaller version of the photograph  
26 with the caption and, thirdly, the Facebook page with yet a  
27 smaller caption - picture of the - a smaller version of the  
28 photograph, are marked MFI-13A, B and C respectively.

29 MR GRIFFITHS: I'm grateful.



1 Q. Now, you accept, Ms White, that Naomi Campbell was your  
2 biggest client, is that right?

3 A. Over the years she possibly was, but I did have very big  
4 clients.

16:02:15 5 Q. Uh-huh?

6 A. As big as her.

7 Q. And the bottom line is you earned a lot of money from her,  
8 didn't you?

9 A. Yes.

16:02:24 10 Q. And not only money, you received a lot of favours as a  
11 result of your relationship with her, didn't you?

12 A. Favours? How do you mean?

13 Q. Would you have had the opportunity of meeting Nelson  
14 Mandela if it were not for Naomi Campbell?

16:02:46 15 A. No, probably not, I --

16 Q. Thank you. Because on that visit in September 1997 you  
17 weren't invited, were you?

18 A. I was contacted to - by the organisers to ask Naomi  
19 Campbell if she would like to go on this charity event.

16:03:14 20 Q. Ms White, the invitation was to Naomi Campbell --

21 A. That's absolutely correct.

22 Q. Thank you. And it was Naomi Campbell who decided to take  
23 you along to give you the opportunity of meeting Nelson Mandela;  
24 that's right, isn't it?

16:03:33 25 A. Not quite. Naomi Campbell asked me to go along - she could  
26 have asked anyone, I appreciate that - but I had already met  
27 Nelson Mandela.

28 Q. And in the August, since you mention it, when you met  
29 Nelson Mandela, you were there as a guest of Naomi Campbell,

1 weren't you?

2 A. No, I wasn't; I was there acting as her agent, looking  
3 after her during the time she was doing a job for Sales House in  
4 South Africa.

16:04:06 5 Q. Is that true?

6 A. That's correct.

7 Q. But in September, it's right, isn't it, you were her guest?

8 A. Yes.

9 Q. And just so that we're clear about this, who paid for your  
16:04:24 10 airline ticket to travel to South Africa and back?

11 A. I would think the organisers.

12 Q. No. Your airline ticket, not Naomi Campbell's?

13 A. Yes.

14 Q. Who would have paid for yours?

16:04:38 15 A. Yes, they would have paid for mine.

16 Q. Are you sure?

17 A. I'm not sure, but to the best of my knowledge that's  
18 probably what would have happened.

19 Q. Can we just lay down a couple of ground rules here,  
16:04:50 20 Ms White. When you're not sure about something, just say so.  
21 When you don't know something, just say so. Who paid for your  
22 ticket?

23 A. I would think the Blue Train organisers.

24 Q. And no doubt you travelled first class?

16:05:07 25 A. If I was accompanying Naomi Campbell I would have travelled  
26 with her.

27 Q. And you travelled first class?

28 A. Most likely.

29 Q. Thank you.

1 PRESIDING JUDGE: But I don't understand these answers,  
2 Ms White. We're not conjecturing about some third party. You  
3 are the one that travelled. Now, did you travel first class or  
4 not?

16:05:31 5 THE WITNESS: To the best of my memory, yes.

6 MR GRIFFITHS:

7 Q. In fact, if we look at the Blue Train Launch Programme of  
8 Events, Ms Naomi Campbell: "Depart London for Johannesburg on  
9 South African Airways first." What does the "first" stand for if  
10 not first class? Do you want to have a look at it?

16:06:04

11 A. Where is it?

12 Q. It looks like this.

13 PRESIDING JUDGE: MFI-11.

14 MR GRIFFITHS: MFI-11, that's correct.

16:06:18

15 Q. My copies aren't clear, but it says quite clearly "first  
16 class".

17 JUDGE LUSSICK: I've got MFI-14 and it says "business  
18 class".

19 MR GRIFFITHS: MFI-11, which is the one bearing

16:06:49

20 Ms Campbell's name at the top, says "first class".

21 THE WITNESS: Yes, it's first class.

22 MR GRIFFITHS: Thank you.

23 JUDGE LUSSICK: I was talking about the first leg,  
24 Mr Griffiths, so you go ahead. I do see now the "London-  
25 Johannesburg" is first class.

16:07:51

26 MR GRIFFITHS: Thank you.

27 Q. Because the first leg of Ms Campbell's journey from Milan  
28 to London, that was business class; and then with you she  
29 travelled first class on South African Airways; that's correct

1 isn't it?

2 A. Yes, correct.

3 Q. So, you see, the bottom line, Ms White, is this: I suggest  
4 you're the one who owes Naomi Campbell and you're the one who has  
16:08:19 5 betrayed her, because I'm going to suggest she gave you,  
6 for example, the opportunity to meet a man once described by the  
7 Western media as a terrorist, now as a living saint. You  
8 wouldn't have had that opportunity were it not for her, would  
9 you?

16:08:41 10 A. Possibly not.

11 Q. Thank you. Next topic: When did you last speak to Mia  
12 Farrow, by any means?

13 A. I think the last time I spoke to Mia Farrow would have been  
14 in '97 on the Blue Train.

16:09:03 15 Q. Have you, or any representative on your behalf, contacted  
16 Mia Farrow since?

17 A. I haven't. I know of no representative on my behalf that  
18 would have contacted Mia Farrow.

19 Q. Are you willing to provide your telephone records to prove  
16:09:29 20 that?

21 A. I'm quite willing. I've never been in touch with Mia  
22 Farrow.

23 Q. The reason I'm asking, and I'll be quite straight with you.  
24 Mia Farrow first makes a statement to the Prosecution two weeks  
16:09:58 25 after you launch your lawsuit in New York, even though the  
26 Prosecution had contacted her several months before. And what I  
27 want to ask you is this: Is that a pure coincidence?

28 A. That is a pure coincidence.

29 Q. Because just so that we're clear, your lawsuit, and I'm

1 Looking at the last page, was launched on 26 October 2009, and  
2 guess what, Mia Farrow's signed declaration is dated 9  
3 November 2009, exactly two weeks afterwards. Have you been in  
4 contact with Mia Farrow at any time since 1997?

16:10:57 5 A. No.

6 Q. And we can have the telephone records, can we?

7 A. If you wish.

8 PRESIDING JUDGE: Ms White, has Mia Farrow been in contact  
9 with you since 1997?

16:11:13 10 THE WITNESS: I've never spoken to her since then.

11 MR GRIFFITHS:

12 Q. You've never spoken to her since September 1997; is that  
13 true?

14 A. I don't think so.

16:11:25 15 Q. Well --

16 A. Well --

17 Q. "I don't think so" is no use to me. I've told you about --

18 A. Okay. No, I have not spoken to her. I have not seen her  
19 since '97.

16:11:35 20 Q. Which is right? You don't think so or you might have or  
21 you didn't? Which one is right?

22 A. I have not spoken to her, seen her since '97.

23 Q. What about any representative on your behalf?

24 A. I have no knowledge of any representative on my behalf.

16:11:55 25 Q. For example, has your lawyer contacted Mia Farrow?

26 A. Not to my knowledge.

27 Q. Were you aware, before arriving at this court, that Mia  
28 Farrow had made a declaration to the Prosecution?

29 A. I'm sorry, what do you mean?

1 Q. Were you aware, before you entered this courtroom, that Mia  
2 Farrow had given a signed so-called declaration to the  
3 Prosecution setting out her recollection of events in  
4 South Africa?

16:12:32 5 A. Well, I was aware that she had gone to the press about this  
6 and had been asked to come to testify, but it's only what I've  
7 read in the press.

8 Q. Were you aware that she had made a signed declaration to  
9 the Prosecution in November of last year?

16:12:55 10 A. No.

11 Q. You've never heard that from anyone?

12 A. No.

13 Q. Not from your lawyer?

14 A. Well, I have not heard, in November, I did not know she'd  
16:13:11 15 made a signed declaration to the Prosecution. I'm sort of aware  
16 that she must have done to get herself here by now.

17 Q. Are you telling us, Ms White, that when you discussed this  
18 matter with your lawyer and he told you that it could be  
19 important, that he didn't mention to you that Mia Farrow had  
16:13:42 20 already made a declaration, didn't he?

21 A. No.

22 Q. So the first time you knew that Mia Farrow had given a  
23 signed statement to the Prosecution was when?

24 A. Probably in the last few days.

16:13:58 25 Q. How did you find that out?

26 A. Because she was coming here, so I knew she must have made a  
27 statement.

28 Q. Has your lawyer contacted any representative acting for Mia  
29 Farrow?

1 A. Not to my knowledge.

2 Q. Has any representative of yours contacted any  
3 representative of Mia Farrow's, to your knowledge?

4 A. No.

16:14:31 5 Q. Now, your previous answer was, "Not to my knowledge."

6 A. No.

7 Q. Now, something like that wouldn't happen without you  
8 knowing about it, would it?

9 A. No.

16:14:43 10 Q. So if it did happen, you should know?

11 A. One would hope so.

12 Q. They wouldn't go off contacting either Mia Farrow herself  
13 or her representatives without telling you about it, would they?

14 A. Who are "they"?

16:15:03 15 Q. Any of your representatives, like that man sitting over  
16 there, your lawyer. That's who I mean.

17 A. No.

18 Q. In September of 1997, Ms White, what did you know about  
19 so-called blood diamonds?

16:15:27 20 A. Nothing.

21 Q. Did you, for example, know they were - trading in them was  
22 illegal?

23 A. I don't know. I don't think so.

24 Q. And in September of 1997, before attending that dinner,  
16:15:49 25 what did you know about Charles Taylor?

26 A. I knew he was the President of Liberia.

27 Q. And what did you know about Liberia?

28 A. I know that Liberia is a country in West Africa, and I  
29 believe it was where the slaves from the United States went up,

1 and it was set up by the United States as a country. That's what  
2 I think I know about Liberia.

3 Q. Were you aware that in September of 1997, Charles Taylor  
4 had only been President for just over a month?

16:16:36 5 A. No, I wasn't aware of that, but --

6 Q. Because he was inaugurated in August 1997. Were you aware  
7 of that?

8 A. No.

9 Q. What's the Kimberley Process?

16:16:50 10 A. The Kimberley Process, I think, is something about using  
11 good diamonds that aren't - haven't been extorted from poor  
12 countries.

13 Q. But this is fair, isn't it: Back in September 1997, before  
14 Hollywood discovered the notion, you had no idea whatsoever about  
16:17:23 15 blood diamonds, did you?

16 A. I wouldn't have - no, I don't, no.

17 Q. You were totally unaware back then - and we need, you see,  
18 sometimes to forget what we've learnt subsequently. Way back  
19 in September 1997, none of this registered with you, did it?

16:17:45 20 A. None of what? The blood diamonds, no.

21 Q. Blood diamonds.

22 A. No.

23 Q. I want you to help me with another matter. As you drive up  
24 to this compound - no, let me start elsewhere.

16:18:12 25 This presidential lodge in Pretoria, is it in the city of  
26 Pretoria itself, or is it out in the suburbs or is it out in the  
27 countryside? Where is it?

28 A. I don't know.

29 Q. Well, let me try and approaching it differently. As you



1 drive up to the main gates leading into the compound, are you  
2 surrounded by fields?

3 A. I don't know.

4 Q. How come? Weren't you there?

16:18:53 5 A. I was there, but I don't recall fields. I just --

6 Q. Just help us. How did you get to the compound? Was it in  
7 a car?

8 A. Yes.

9 Q. Well, help me: Whilst you were looking out of the windows  
16:19:04 10 of that car as you approached a compound, what did you see?

11 A. I was probably asleep. I'd just got off the flight. I  
12 don't recall seeing fields.

13 Q. What surrounds the compound, if anything? Is it a wall, a  
14 fence, trees, bushes, what?

16:19:27 15 A. I was aware of trees.

16 Q. Do you have to go through a gate in order to enter the  
17 compound?

18 A. I don't recall.

19 Q. Do you recall there being sentries or a checkpoint which  
16:19:47 20 you had to go through in order to enter the compound?

21 A. I think there were sentries, checkpoint.

22 Q. And then once you get into the compound, what do you see?

23 A. Gardens.

24 Q. Large gardens?

16:20:08 25 A. Yeah.

26 Q. And then there's the baronial -style lodge which you've  
27 described, yes?

28 A. Yes.

29 Q. There's at least one other building where the President

1 lives; is that right?

2 A. Yes.

3 Q. Any other buildings on the site?

4 A. I don't recall.

16:20:31 5 Q. Now, Charles Taylor and his entourage were not staying in  
6 the compound, were they?

7 A. I don't know. I think they were staying in Johannesburg.

8 Q. The reason why I'm asking you about - well, let me go on a  
9 bit further. No doubt, because it's the President of the

16:20:59 10 Republic of South Africa, there's a great deal of security around  
11 that compound; is that right?

12 A. Yeah.

13 Q. Were they armed men?

14 A. Yes.

16:21:23 15 Q. Lots of them?

16 A. I don't recall.

17 Q. Apart from that, there was undoubtedly lots of staff  
18 servicing this compound, weren't there?

19 A. In the bit I was in, there were servants, and sentries  
16:21:38 20 outside the gates.

21 Q. Yes. And tell me, can you help me with this? What time of  
22 night was it that these two men turned up throwing stones at your  
23 window?

24 A. I think it was most likely after midnight, 1 o'clock.

16:22:01 25 Q. The reason I'm asking, you see, there's testimony before  
26 this Court that Charles Taylor and his entourage weren't staying  
27 in the compound; they were staying elsewhere. So I'd like you to  
28 help me. How did two burly black men make it through all the  
29 security without being spotted, into the presidential compound,

1 gone midnight, to throw stones at your window? How did they  
2 manage it?

3 A. I have no idea. It's a question I ask myself.

4 Q. The reason I ask is this. Let's approach it another way.

16:22:49 5 You tell us that when you arrived, you saw large group of black  
6 people; is that right?

7 A. Sorry, I don't recall what you --

8 Q. You know when Graca Machel told you, "You don't want to be  
9 too close to that man" or Naomi Campbell told you, "You don't  
10 want to be too close to that Charles Taylor", you remember that?

16:23:08 11 A. No, Naomi Campbell told me that Graca Machel was not keen  
12 to have him at dinner.

13 Q. Did you see a group of black men at the compound when you  
14 arrived?

16:23:30 15 A. At the guesthouse.

16 Q. How many of them?

17 A. I don't know.

18 Q. Just give us an idea.

19 A. I don't know.

16:23:40 20 Q. Were there lots of black men in and around that compound?  
21 Bearing in mind, of course, you know, it's Africa. Were there  
22 lots of black men hanging around that compound?

23 A. The only thing I recall is the guards, sentries outside the  
24 guesthouse.

16:24:03 25 Q. Were there other black men in and around that compound?

26 A. I don't know. I'm sure there were.

27 Q. I'm asking for this reason, you see, because I'm going to  
28 suggest that the men who came to that compound did not say they  
29 were from Liberia. Because, if they were Liberians, as you have

1 quite dishonestly told this Court, they couldn't have got into  
2 the compound at that time of the night. So, if two men came to  
3 that window, they must have been staying in the compound. Do you  
4 follow? Do you follow me?

16:24:55 5 A. I can see where you're going, but two men came into the  
6 compound with diamonds. They were two black men.

7 Q. And they did not say they were from Liberia or from the  
8 Liberian President.

9 A. They said that they had a gift for Naomi Campbell.

16:25:14 10 Q. They did not say they were bearing a gift from the Liberian  
11 President.

12 A. I don't recall.

13 Q. They did not say that, did they?

14 A. I don't recall it.

16:25:27 15 PRESIDING JUDGE: Ms White, this is important. And so we  
16 would appreciate a straight answer, a straight answer would be  
17 very helpful to the Bench. Now, the question is: "These men did  
18 not say they were bearing a gift from the Liberian President, did  
19 they?"

16:25:51 20 THE WITNESS: They said they had a gift for Ms Campbell.

21 PRESIDING JUDGE: That is not what I asked, ma'am. I asked  
22 whether they said, in your hearing, that this gift was from the  
23 Liberian President or not. They didn't say that - this is the  
24 proposition - did they?

16:26:09 25 THE WITNESS: [Microphone not activated].

26 MR GRIFFITHS: Thank you.

27 PRESIDING JUDGE: Sorry?

28 THE WITNESS: Sorry?

29 PRESIDING JUDGE: What was the answer, ma'am?

1 THE WITNESS: No.

2 MR GRIFFITHS:

3 Q. Just so that we're clear for the record, the men did not  
4 say that they were bearing a gift from the Liberian President,  
16:26:26 5 did they?

6 A. No.

7 Q. Thank you.

8 PRESIDING JUDGE: And the record has to reflect a "no" at  
9 page 191 line 5.

16:26:40 10 MR GRIFFITHS: I'm grateful.

11 Q. Now, the dinner held that night was by invitation only,  
12 wasn't it?

13 A. Yes.

14 Q. Well, let me helpfully use the Prosecution's bundle of  
16:27:21 15 documents and, behind divider 5, can the witness be shown this  
16 photograph, please.

17 PRESIDING JUDGE: That will be exhibit --

18 MR GRIFFITHS: D-424, Madam President.

19 PRESIDING JUDGE: D-427, I think.

16:28:04 20 MR GRIFFITHS: Well, I think the Defence put this one in  
21 first, Madam President. It was MFI-11 with Naomi Campbell last  
22 Thursday, and I think it should be D-424.

23 PRESIDING JUDGE: Yes, indeed, you're right.

24 MR GRIFFITHS:

16:28:33 25 Q. Now, there are 10 people in this photograph, Ms White, but  
26 in fact there were a lot more people present at the dinner,  
27 weren't there?

28 A. I don't recall.

29 Q. Well, help me with this: You're not in this photograph,

1 are you?

2 A. No.

3 Q. But you were there?

4 A. Yes.

16:28:57 5 Q. The Liberian defence minister, who you thought was the  
6 defence minister, he was there?

7 A. Yes.

8 Q. Wasn't he?

9 A. Yes.

16:29:06 10 Q. He's not in the photograph. Mia Farrow's children were  
11 there. They're not in the photograph, are they?

12 A. No.

13 Q. So just give us an idea. Whilst this photograph was being  
14 taken, no doubt the remaining guests would have been somewhere

16:29:24 15 else in the dining room, yes?

16 A. Yes.

17 Q. So help us. How many additional guests were there, apart  
18 from the 10 we see in the photo?

19 A. Probably about 15, totalling.

16:29:45 20 Q. And help me, of those 15 --

21 PRESIDING JUDGE: Sorry. Ms White, you mean five  
22 additional people, apart from these?

23 THE WITNESS: Yeah. Four to five.

24 MR GRIFFITHS:

16:30:03 25 Q. Four to five?

26 A. Uh-huh.

27 Q. Apart from the people we see in the photograph?

28 A. Uh-huh.

29 Q. Wasn't it more like 10 or so additional people, apart from

1 those we see in the photograph, about 20 people in all, roughly?

2 A. It could have been, I don't know.

3 Q. I'm asking for this reason: These additional people, how  
4 many of them were black males?

16:30:28 5 A. Sorry, were black?

6 Q. How many of these additional people, not shown in the  
7 photograph, were black males?

8 A. I don't know. I don't know. Two.

9 Q. I'm asking for this reason: Were there other candidates  
16:30:53 10 for the role of donor of diamonds to Naomi Campbell. Do you  
11 follow me? Do you follow?

12 A. Were there other candidates too?

13 Q. Were there other black men present at the dinner who are  
14 not shown in the photograph?

16:31:13 15 A. I don't know. The minister, definitely.

16 Q. So at least one other, yes?

17 A. Yes.

18 MR GRIFFITHS: I note the time, Madam President. Would  
19 that be a convenient point?

16:31:27 20 PRESIDING JUDGE: Certainly.

21 Ms White, this is the time of the day that the proceedings  
22 come to an end. We will continue with your testimony tomorrow  
23 morning at 9, but I must caution you, you are not to discuss your  
24 evidence with anybody, and that includes your lawyer in court.

16:31:47 25 Do not discuss your evidence with anybody tonight.

26 So the Court is adjourned to tomorrow at 9 o'clock.

27 [Whereupon the hearing adjourned at 4.32 p.m.

28 to be reconvened on Tuesday, 10 August 2010 at

29 9.00 a.m.]

## I N D E X

### WITNESSES FOR THE PROSECUTION:

MI A FARROW	45649
EXAMINATION-IN-CHIEF BY MR KOUMJIAN	45649
CROSS-EXAMINATION BY MR ANYAH	45663
CAROLE WHITE	45752
EXAMINATION-IN-CHIEF BY MS HOLLI S	45752
CROSS-EXAMINATION BY MR GRI FFITHS	45777

### EXHIBITS:

Exhi bi ts P-558A and B admi tted	45751
Exhi bi t D-426 admi tted	45751
Exhi bi t D-427A and B admi tted	45751
Exhi bi ts D-428 to D-432 admi tted	45752