



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 5 AUGUST 2010
9.00 A.M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Mr Simon Meisenberg
Ms Doreen Kiggundu

For the Registry:

Mr Gregory Townsend
Ms Advera Nsiima Kamuzora
Ms Rachel Irura
Ms Zainab Fofanah
Mr Alhassan Fornah

For the Prosecution:

Ms Brenda J Hollis
Mr Joseph F Kamara
Mr Nicholas Koumjian
Mr Mohamed A Bangura
Ms Kathryn Howarth
Sir Desmond de Silva QC
Ms Maja Dimitrova
Ms Ruth Mary Hackler
Ms Sigall Horovitz
Ms Ula Nathai-Lutchman
Mr Nathan Quick

For the accused Charles Ghankay
Taylor:

Mr Courtenay Griffiths QC
Mr Terry Munday
Mr Morris Anyah
Ms Silas Chekera
Ms Logan Hambriek
Ms Fatiah Balfas
Mr Simon Chapman
Mr Michael Herz
Ms Kathryn Hovington
Mr Isaac Ip
Mr James Kamara
Ms Salla Moilanen

For the witness Naomi Campbell: Mr Ken Macdonald

1 Thursday, 5 August 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 9.02 a.m.]

09:02:20 5 PRESIDING JUDGE: Good morning. Before the proceedings
6 commence, I'm given to understand that there is a photographer
7 that has been permitted to take photographs for one minute, so I
8 will let that photographer do his job.

9 Very well. We will now take appearances, please.

09:03:23 10 MS HOLLIS: Good morning, Madam President, your Honours,
11 opposing counsel. Appearing this morning for the Prosecution,
12 Joseph Kamara, Nicholas Koumjian, Mohamed A Bangura, Kathryn
13 Howarth, Ruth Mary Hackler, Ula Nathai-Lutchman, Nathan Quick and
14 myself, Brenda J Hollis. The Prosecution is also joined this
09:03:50 15 morning by Maja Dimitrova, our case manager, Sir Desmond de Silva
16 QC legal consultant, Sigall Horovitz legal consultant, and our
17 interns, Imogen Parmar, Jacqueline Greene, Gordon Brandt, Gil
18 Shefer and Lena Sokolic.

19 PRESIDING JUDGE: Thank you, Ms Hollis. Mr Griffiths?

09:04:17 20 MR GRIFFITHS: Good morning, Madam President, your Honours,
21 counsel opposite. For the Defence today, myself Courtenay
22 Griffiths; with me Mr Terry Munyard, Mr Morris Anyah and Mr Silas
23 Chekera of counsel. We are also joined by other members of the
24 team today, our legal assistants Logan Hambrick, Fatiah Balfas,
09:04:40 25 Simon Chapman, Kathryn Hovington, Michael Herz and Isaac Ip; and
26 also our case manager Salla Moilanen and our administrator James
27 Kamara.

28 MR MACDONALD: Madam President, your Honours, with the
29 leave of the Court, I'm here to represent Ms Naomi Campbell this

1 morning, my name is Ken Macdonald. Thank you.

2 PRESIDING JUDGE: Mr Macdonald, you're welcome to the
3 Court. Now, Ms Hollis, are you taking charge of the next
4 witness?

09:05:18 5 MS HOLLIS: That is correct, Madam President.

6 PRESIDING JUDGE: Please call your - or first tell the
7 Court who your next witness will be, the language she will
8 testify in and the religion.

9 MS HOLLIS: Madam President, the next witness will be Naomi
09:05:32 10 Campbell. She will testify in English, and I will have to ask
11 the Registry as to which religion, because I do not know.
12 I haven't spoken with the witness.

13 MS IRURA: Your Honour, we have been informed that
14 Ms Campbell will be swearing on the Bible.

09:05:53 15 PRESIDING JUDGE: Please call the witness in. I certainly
16 hope Ms Campbell is not being conveyed from her hotel. Where is
17 she?

18 MS HOLLIS: Madam President, the Prosecution has not met
19 with the witness but it was our understanding that she was here
09:08:02 20 in a witness room waiting to come into court.

21 MR TOWNSEND: May it please the Trial Chamber, Gregory
22 Townsend appearing for the Registrar. My understanding is that
23 she arrived at a quarter to nine, your Honour. It will just be a
24 moment, your Honour, before she's brought in from the witness
09:08:19 25 waiting area. We apologise for the delay. We understand that
26 she will be here in a minute.

27 WITNESS: NAOMI CAMPBELL [Sworn]

28 EXAMINATION-IN-CHIEF BY MS HOLLIS:

29 Q. Good morning, Ms Campbell.

1 A. Good morning, Ms Hollis.

2 Q. Ma'am, would you please give your name?

3 A. Naomi Campbell.

4 Q. And could you tell us your date of birth?

09:10:55 5 A. 22nd of May, 1970.

6 Q. And what was your place of birth?

7 A. London, England.

8 Q. What is the city and country of your current legal

9 residence?

09:11:06 10 A. I live - United States.

11 Q. And could you tell us the city in the United States that is

12 your legal residence?

13 A. New York.

14 Q. New York. Ms Campbell, what is your occupation?

09:11:17 15 A. I'm a model, I'm a self-employed businesswoman and I do a

16 lot of charity work.

17 Q. And, ma'am, how long have you been a model?

18 A. Twenty-five years.

19 Q. I'd like to draw your attention to September of 1997 and

09:11:32 20 ask you, at that time, September of 1997, what was the city and

21 country of your legal residence?

22 A. I believe United States.

23 Q. And in 1997, were you also at that time engaged in charity

24 work?

09:11:48 25 A. Yes, I was.

26 Q. And could you tell us what charities you were supporting at

27 that time?

28 A. I was an ambassador for the Nelson Mandela Children's Fund

29 and I still am today.

1 Q. When you say you were an ambassador for that fund, what
2 does that mean?

3 A. I was made an ambassador to bring - to make - to raise
4 funds and make - raise awareness for underprivileged children in
09:12:14 5 South Africa.

6 Q. So that fund operates in South Africa?

7 A. Yes.

8 Q. In September of 1997, were you involved in any activities
9 in relation to the Nelson Mandela Children's Fund?

09:12:29 10 A. I was, yes.

11 Q. And what were those activities in September of 1997?

12 A. The inauguration of the Blue Train.

13 Q. What is the Blue Train?

14 A. It's a train that goes from Johannesburg to Cape Town, I
09:12:47 15 believe.

16 Q. And do you remember when in September of 1997 you were
17 involved in those activities?

18 A. I don't remember the exact date, no, but I was there.

19 Q. And do you recall for what period of time you were in South
09:13:02 20 Africa in September?

21 A. I believe I was there for 72 hours.

22 Q. And what functions were you involved in in relation to this
23 event?

24 A. I was involved in the inauguration at the station and the
09:13:17 25 ride, the trip through - that the train went from Johannesburg to
26 Cape Town and at the end a fundraiser for the Nelson Mandela
27 Children's Fund.

28 Q. And prior to this trip on the train, did you attend any
29 functions in relation to --

1 A. I attended the dinner in the house that I was staying in.

2 Q. And who hosted this?

3 PRESIDING JUDGE: Excuse me, Ms Hollis. Ms Campbell, could
4 you pause a moment and let counsel finish her question so that
09:13:45 5 your voices don't overlap, for purposes of the record, please.

6 MS HOLLIS:

7 Q. Thank you, Ms Campbell. Could you tell us who hosted that
8 dinner that you attended?

9 A. The dinner was in Mr Mandela's home, presidential home.

09:14:00 10 Q. And do you recall who was present at that dinner?

11 A. Yes. Mia Farrow, Imran and Jemima Khan, Quincy Jones,
12 myself, and Mr and Mrs Mandela, and there were some other people
13 I don't recall, it was 13 years ago.

14 Q. And you said that this dinner was in Mr Mandela's home?

09:14:25 15 A. In the presidential home.

16 Q. Ms Campbell, have you ever met the accused in this case,
17 Charles Taylor?

18 A. Yes, at this dinner.

19 Q. And was that when you first met him?

09:14:38 20 A. First time I ever met him, yes.

21 Q. And how did you happen to meet him at this dinner?

22 A. He showed up to the dinner after we had all been seated and
23 we had already started dinner.

24 Q. And then did he remain for the dinner, do you recall?

09:14:54 25 A. Yes, he did.

26 Q. Do you recall who you sat with during the dinner?

27 A. I sat next to Mr Mandela and Quincy Jones on the other
28 side.

29 Q. And do you recall any others that were in your area at the

1 dinner?

2 A. It wasn't a big table, I remember. It was just for people
3 that were guests of the Blue Train.

4 Q. And when Mr Taylor arrived for this dinner, did you ever
09:15:22 5 have occasion to speak with Mr Taylor?

6 A. Yeah, we all did. He told us where he was from and who he
7 was.

8 Q. And do you recall if Mr Taylor was also at your table?

9 A. There was only one table.

09:15:37 10 Q. So everyone was at this table?

11 A. Yeah.

12 Q. And during the dinner, do you recall did you have any
13 conversations with Mr Taylor?

14 A. I did. He told us all about where he came from and who he
09:15:49 15 was, and basically it was just general conversation at the table
16 with everyone.

17 Q. At the time of this dinner, where were you lodging?

18 A. I was sleeping at - all the guests were sleeping in that
19 presidential home.

09:16:07 20 Q. And was it the presidential home itself or was there some
21 other guest home --

22 A. The presidential --

23 Q. Guest lodge?

24 A. I don't know, actually. I don't know the statistics and
09:16:15 25 the layout of the presidential home in South Africa, if it was
26 the home itself or the guest home, I don't know.

27 Q. And do you recall the layout of that building that you were
28 lodging in; was it one storey, two storey --

29 A. No, that was 13 years ago, I'm sorry, I don't.

1 Q. Do you recall if there was more than one storey?

2 A. Yes, there was more than one storey.

3 Q. And where was your room in that building?

4 A. My room was upstairs.

09:16:40 5 Q. And do you recall to this building, was it open access or
6 was it controlled access or do you recall?

7 A. There was a lot of security around the house, and a lot of
8 staff in the house.

9 Q. And do you recall if Mr Taylor was staying at that house?

09:17:00 10 A. No, he was not staying at that house.

11 Q. And do you recall if any of his entourage were staying at
12 the house?

13 A. No.

14 Q. After the dinner ended, where did you go?

09:17:14 15 JUDGE DOHERTY: Ms Hollis, that "no" is ambiguous. I don't
16 know if the witness means she does not recall or in the negative.

17 THE WITNESS: No, he was not staying at the house.

18 MS HOLLIS:

19 Q. And as for his entourage?

09:17:26 20 A. No, they were not staying at the house.

21 Q. Thank you for clarifying that, Ms Campbell. After the
22 dinner ended, where did you go?

23 A. Upstairs to my room. I'd been travelling the last 48
24 hours, I'd been in New York, Milan, and London to get to South
09:17:46 25 Africa.

26 Q. Do you recall what time the dinner ended?

27 A. Fairly early, because we had an early call the next day,
28 like 7 a.m. we had to be ready, so fairly early, but I don't
29 recall the exact time.

1 Q. Now, as for the dinner itself, you indicated that Mr Taylor
2 was telling the people at the table about himself, where he was
3 from. Do you recall did he have any conversation with you
4 specifically?

09:18:17 5 A. Not specifically, no. He explained about his country being
6 a beautiful country, but not specifically as I was sitting next
7 to Mr Mandela, who when I'm in Mr Mandela's presence,
8 Mr Mandela's my focus.

9 Q. All right. Now, you said that you had an early call the
09:18:37 10 next day and so you went upstairs to your room?

11 A. Everyone went up at the same time.

12 Q. Did anything happen after you went upstairs to your room?

13 A. Yeah. When I was sleeping, I had a knock at my door and
14 I opened my door, and two men were there and gave me a pouch and
09:19:01 15 said, "A gift for you."

16 Q. Do you know what time that was that that happened?

17 A. No, I don't know. I just - I was sleeping so I was woken
18 up from my sleep.

19 Q. And these two men, did you know who they were?

09:19:16 20 A. No, I'm afraid not.

21 Q. Did these two men introduce themselves to you?

22 A. No, they did not.

23 Q. Did you ever learn who they were?

24 A. No, I did not.

09:19:25 25 Q. And you said they knocked at your door and they told you
26 what?

27 A. "A gift for you", and they gave me a pouch.

28 Q. And did they say anything other than that?

29 A. No.

1 Q. Did you ever subsequently learn who this gift was from?

2 A. No. I was - the next morning, at breakfast, I told
3 Ms Farrow and Ms White what had happened, and one of the two
4 said, "Well, that's obviously Charles Taylor", and I just said,

09:19:59 5 "Yeah, I guess it was."

6 Q. Now, you've mentioned a Ms White. Who is Ms White?

7 A. Ms White is my ex-model agent.

8 Q. And so she was on that trip with you at that time?

9 A. Correct.

09:20:10 10 Q. And when the men came to your door and awoke you from
11 sleep, I understand, did you ask them who they were?

12 A. No, I was extremely tired and I wasn't sure if they were
13 from the staff of the house or - I wasn't sure who they were.

14 Q. And this pouch that they gave you, what happened after they
09:20:35 15 gave you the pouch?

16 A. When they gave me the pouch I just put it next to my bed
17 and went back to bed.

18 Q. So at that time you didn't look into the pouch?

19 A. I opened the pouch the next morning when I woke up.

09:20:50 20 Q. And when they came to your door, did you ask them what this
21 pouch was, what was in the pouch?

22 A. No, I took it and I just said, "Thank you", and went back -
23 took it and shut my door.

24 Q. Did they say anything about why they were bringing this
09:21:05 25 pouch to you?

26 A. There was no explanation, no note.

27 Q. So you put the pouch by your bed and then you went back to
28 sleep?

29 A. Correct.

1 Q. At some point did you look into this pouch to see if there
2 was anything in it?

3 A. In the morning I did, yes, when I opened up in the morning.

4 Q. And when you opened up this pouch, what did you discover?

09:21:24 5 A. I saw a few stones in there.

6 Q. And --

7 A. And they were very small, dirty looking stones.

8 Q. And these small dirty looking stones, what did you do with
9 them after you --

09:21:40 10 A. I went downstairs to breakfast and I took all my luggage,
11 my - yeah, my luggage with me, as we were to leave from breakfast
12 to the cars to the train, and I wanted to find my friend, who is
13 someone that I trust and does great things in South Africa with
14 charity, to give them to him to do something with. I didn't want
09:22:02 15 to keep them. And that's exactly what I did.

16 Q. Now, let's explore that in a bit more detail in a moment
17 but, going back to these men who came to your door, what was
18 their race?

19 A. They were black men, two black men.

09:22:22 20 Q. And you had never seen them before?

21 A. Never.

22 Q. And when they came to your door, do you recall what they
23 were wearing?

24 A. I'm sorry, it's 13 years ago, I really don't.

09:22:33 25 Q. All right. So you had these stones. Why did you take them
26 to this person?

27 A. Jeremy is someone that that I've known for a long time and
28 I trust, and, as I said, he is someone that does great things in
29 South Africa for children, so that's why I wanted to give them to

1 him to do something with as I did not want them, and, as I was
2 there in South Africa working on behalf of the Nelson Mandela
3 Children's Fund, it's not my nature when there to take something
4 when I'm trying to raise funds for underprivileged children.

09:23:07 5 Q. And Jeremy is - what's his last name?

6 A. Jeremy Ractliffe.

7 Q. And what was his position at the time?

8 A. At the time I believe he was the head of the Nelson Mandela
9 Children's Fund.

09:23:16 10 Q. What did you think these stones were?

11 A. Well, I was set - when I told to Ms White and Ms Farrow at
12 the breakfast table, one of them, I'm not sure which one of them,
13 said, "Well, they're obviously diamonds".

14 Q. So they recognised them as diamonds?

09:23:30 15 A. I don't remember showing them the diamonds. I don't
16 remember opening the pouch and showing either one of them.

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

19 A. Yes.

09:23:46 20 Q. And what did you tell them exactly that happened?

21 A. I told them exactly what had happened in the middle of the
22 night, my door was knocked at and I opened the door and I was
23 given a pouch, and I told them the whole - what I just told you,
24 and I'm not sure which one of the two said, "Well, that's
09:24:02 25 obviously Charles Taylor".

26 Q. And then they also said that these stones that you
27 described must be diamonds?

28 A. Mm-hm.

29 Q. Did you have the pouch with you at breakfast?

1 A. I had the pouch with me but I don't recall showing -
2 opening the pouch and showing it.

3 Q. Is it possible that you did and you don't recall or are you
4 - your recollection is that --

09:24:19 5 A. It's possible I did but I don't recall. I really - my
6 intention at that moment and at that time was to give them - find
7 Jeremy and give them to him.

8 Q. And where was it that you found Jeremy to give these stones
9 to?

09:24:35 10 A. I can't recall if I found Jeremy outside of the house to
11 put us in the cars or if he met us at the station. I can't
12 recall.

13 PRESIDING JUDGE: Please pause. Ms Hollis, I just seek
14 clarification from the witness. Ms Campbell, you've told us what
09:24:50 15 your colleagues thought these stones were. What did you think
16 the stones were?

17 THE WITNESS: I can't hear you. Could you please repeat
18 the question.

19 PRESIDING JUDGE: What did you think the stones were?

09:24:59 20 THE WITNESS: They were kind of dirty looking pebbles.
21 They were not - they were dirty. I don't know. I find when I'm
22 used to seeing diamonds, I'm used to seeing diamonds shiny and in
23 a box, you know. That's the kind of diamonds I'm used to seeing.
24 So I've never seen - if someone hadn't said they were diamonds
09:25:18 25 I wouldn't have guessed right away that they were diamonds.

26 PRESIDING JUDGE: But did you believe, after being spoken
27 to by your colleagues - let me finish, please. Did you believe
28 that they were diamonds after you were told?

29 THE WITNESS: I assumed so.

1 MS HOLLIS:

2 Q. And, Ms Campbell, what was Jeremy's reaction when you gave
3 this pouch with these stones in it to him?

09:25:48

4 A. I don't recall his reaction. I just said, "Take them, do
5 something with them, and make sure children benefit from them."
6 I didn't want to keep them.

7 Q. So at that point in time, you were of a mind that they were
8 diamonds?

09:26:04

9 A. Yes, because I'd been - I'd had that conversation at the
10 breakfast table.

11 Q. And do you know in your presence, did Jeremy Ractliffe look
12 at the contents of the pouch you had given him?

13 A. I'm not sure if he looked at them in front of me, that's
14 possible, I don't recall, or if he looked at them afterwards.

09:26:18

15 Q. And did he ever talk to you after that about this pouch and
16 these stones you had given him?

17 A. No, he hadn't; until last year, 2009, when you, the United
18 Nations, called up my lawyer to ask about these diamonds was the
19 second time I had spoken to him about them and, to my surprise,
20 he still has them.

09:26:40

21 PRESIDING JUDGE: Ms Hollis, please, we will clarify again.
22 Ms Campbell, can you recall how many stones there were?

23 THE WITNESS: I really don't recall after 13 years. Maybe
24 three, two or three.

09:26:58

25 MS HOLLIS:

26 Q. And when you spoke with Mr Ractliffe last year, did he
27 indicate to you that indeed these were diamonds or did he still
28 not know what they were?

29 A. Yes, I believe yes, he had. Yeah, he did indicate that

1 they were diamonds.

2 Q. When you gave the pouch to Mr Ractliffe and told him to do
3 some good with them, did he inquire of you where you had obtained
4 these stones?

09:27:23 5 A. I don't believe so because he was - I remember I just said
6 I got them and do something with them. Once I had given them
7 over I really just - it was out of my hands and I didn't really
8 care about it any more.

9 Q. And just to have some more detail about this transaction in
09:27:41 10 the middle of the night, as you said: Do you recall why was it
11 you didn't ask where this gift was --

12 A. I was sleeping, and I had just travelled for many hours.
13 I was exhausted. I had done New York, Milan, London, South
14 Africa in the space of three days, which is very normal for me to
09:28:02 15 travel that much, even today. So I remember just being exhausted
16 and having to get up. I knew I had an early call at 7 o'clock;
17 we had to be at the station to do a press conference with
18 Mr Mandela.

19 Q. And as you think back on this event, Ms Campbell, at the
09:28:19 20 time that you were given the gift, did you not inquire as to what
21 it was because you already knew what you were --

22 A. No, I didn't inquire. I told the breakfast table what had
23 happened, and either Ms White or Ms Farrow had said that it's
24 probably Charles Taylor and that they were diamonds.

09:28:39 25 Q. When they said it's probably Charles Taylor, did they
26 explain to you why they said that?

27 A. No, they did not.

28 Q. And when they told you it's probably diamonds, did they
29 explain why they thought that?

1 A. No, they did not.

2 Q. When you spoke with Jeremy Ractliffe last year, did he
3 explain to you why he continued to have these diamonds?

4 A. He said basically - I can't remember if he said that he
09:29:09 5 couldn't get them ready, or I said, "Had you auctioned them for
6 the charity?" And he had said that he didn't have time, or it
7 wasn't possible because of - when we arrived in Cape Town, the
8 event was that evening.

9 Q. To your knowledge, where are these stones today?

09:29:30 10 A. With Mr Ractliffe.

11 Q. And he lives in South Africa; is that correct?

12 A. Correct.

13 Q. And what is his position today?

14 A. I don't know. I think he's no longer the head of the
09:29:41 15 Children's Fund; he's retired, I believe.

16 Q. Now, you said that at the time you went to breakfast and
17 Carole White and Mia Farrow were at breakfast, you said at that
18 time that Ms Carole was an agent for you?

19 A. She was an agent. She is no longer.

09:29:59 20 Q. And what were her duties at that time as an agent for you?

21 A. Her duties were just to - she was actually just
22 accompanying me as a guest, just someone that I wanted to
23 introduce and give the opportunity to meet Mr Mandela.

24 PRESIDING JUDGE: Ms Hollis, before we go into Carole
09:30:14 25 White, I just wanted to clarify with the witness. Ms Campbell,
26 you said your colleagues, Mia Farrow and Carole White, said that
27 it was - it could have been Mr Taylor, or it most likely was
28 Mr Taylor. What did you think?

29 THE WITNESS: I just assumed it was.

1 PRESIDING JUDGE: Why?

2 THE WITNESS: I don't know. I don't know anything about
3 Charles Taylor. Never heard of him before. Never heard of the
4 country Liberia before. I never heard of the term of blood
09:30:42 5 diamonds before. So I just assumed that it was.

6 MS HOLLIS:

7 Q. Ms Campbell, these men who came to your door, did they
8 explain to you how they were able to get past the security to get
9 to your door?

09:30:59 10 A. No, they didn't.

11 Q. And --

12 A. That's why I didn't know if it was staff of the house. I
13 didn't know where and who they came from, and that's why there
14 was the possibility of me thinking they just worked there or
09:31:13 15 security - there was a lot of people around that house at that
16 time.

17 Q. And at the breakfast where you told them about this - where
18 you told them about this event, why was it you told these two
19 ladies about what had happened?

09:31:29 20 A. Because they were - some people had eaten breakfast already
21 and some hadn't come down, and Carole White I trusted at the
22 time, she was my agent, and I told them, you know, someone came
23 to my door and gave me this pouch. It would be normal for me to
24 tell someone I trusted and someone I had worked with.

09:31:49 25 Q. And at that point in time, what was your relationship with
26 Mia Farrow?

27 A. That was the first time I ever met her.

28 Q. And have you met her subsequent to that occasion?

29 A. I met her again a year later in 1998. I did a fundraiser

1 for the Nelson Mandela Children's Fund in the honour of Gianni
2 Versace, the late Gianni Versace.

3 Q. Thank you. And how would you characterise the relationship
4 that you currently would have with Mia Farrow?

09:32:17 5 A. I don't. I didn't - I haven't had one since 1998. I never
6 saw her again.

7 Q. So it was just a casual acquaintance on those two
8 occasions?

9 A. Someone that was supporting the same thing I was,
09:32:29 10 underprivileged children in South Africa. That's about it.

11 Q. When you gave the pouch to Jeremy Ractliffe was anyone else
12 present when you did that?

13 A. His wife.

14 Q. And what is his wife's name, please.

09:32:41 15 A. Gail Ractliffe.

16 Q. Thank you.

17 PRESIDING JUDGE: Perhaps Ms Campbell could explain a
18 little bit in detail what this pouch looked like.

19 THE WITNESS: It was like a cloth, like in a cloth, so
09:33:02 20 I say a pouch. It was like a something cloth, I don't recall
21 after 13 years, but it was something like a cloth.

22 MS HOLLIS:

23 Q. And again in relation to Mr Ractliffe still being in
24 possession of these stones, which you, at this time, believe were
09:33:26 25 diamonds, did he indicate to you why he was unable to get rid of
26 these stones?

27 A. No, you'd have to ask him. He didn't.

28 Q. And, Ms Campbell, is there anything else in relation to
29 this incident that occurred that I haven't asked you about that

1 you think would be important for the judges to know?

2 A. No, I've told you this is a matter of like 12 hours for me
3 and I've told you from the big dinner till the next morning when
4 I handed them over to Jeremy, and that's the extent of it. They
09:33:58 5 were in my possession for, like, I don't know, six hours.

6 Q. And other than this meeting with Charles Taylor at the
7 dinner, since that time, or even later that night, have you had
8 any other contact with Mr Charles Taylor?

9 A. No contact. I have never seen him again since the dinner
09:34:16 10 table.

11 Q. And, Ms Campbell, I notice again that you are answering
12 before I've finished.

13 A. Sorry.

14 Q. Are you a bit nervous?

09:34:22 15 A. No. Well, I didn't really want to be here, so I was made
16 to be here, so obviously I'm just like wanting to get this over
17 with and get on with my life. This is a big inconvenience for
18 me.

19 Q. And you said you didn't want to be here. Why did you not
09:34:36 20 want to be here?

21 A. Because I really don't want anything to do with this and
22 I care about the protection of my family and, as I said on
23 television before, I didn't want to have anything to do with
24 this.

09:34:45 25 Q. And why would you be concerned about the protection of your
26 family?

27 A. Because this is someone that I read up on the internet
28 that's killed thousands of people, supposedly, and I don't want
29 my family in any danger in any way.

1 MS HOLLIS: Madam President, I have no - excuse me for a
2 moment.

3 PRESIDING JUDGE: Ms Campbell, you've said that you
4 believed or assumed that Mr Taylor had given you these stones.

09:35:14 5 Did you ever take up this issue with him the next day?

6 THE WITNESS: Sorry, could you repeat the question?

7 PRESIDING JUDGE: You've told the Court that you assumed
8 that Mr Taylor gave you these stones. Did you ever take up this
9 issue with Mr Taylor the next day?

09:35:30 10 THE WITNESS: I never saw him again, so no.

11 MS HOLLIS:

12 Q. Now, when at breakfast, to follow up on this - when at
13 breakfast you were told that probably they were diamonds and
14 probably they came from Charles Taylor, did you consider thanking

09:35:52 15 him for the gift to you of these diamonds?

16 A. I didn't thank him. I just looked for my friend Jeremy
17 Ractliffe and gave them to him.

18 Q. And I think the question was did you consider thanking
19 Mr Taylor?

09:36:04 20 A. No, I did not consider him and I wouldn't know how, I had
21 no way of contacting him and I had no intentions to contact him.

22 Q. And as you said, since that time, since the dinner, you've
23 had no contact with Mr Taylor at all?

24 A. No.

09:36:18 25 Q. Were you ever in contact with any of his representatives?

26 A. No.

27 Q. And I may have asked you this before, and I apologise if
28 I did, but the men who came to your door, woke you from sleep in
29 the middle of the night, you had indicated you were tired, you

1 had been travelling quite a bit?

2 A. Yeah.

3 Q. But do you recall why it is you did not ask them why they
4 were giving this pouch to you?

09:36:47 5 A. I don't recall because it's 13 years ago, I just took them
6 and it's not abnormal for me to get gifts, I get gifts given to
7 me all the time at any hour of the night, sometimes the
8 concierges without notes of who they are from. It's quite normal
9 for me to receive gifts.

09:37:06 10 Q. And, Ms Campbell, you indicated that you had travelled to
11 South Africa after that, I believe, in 1998 at least you
12 mentioned being there?

13 A. I travelled many, many times, yeah, because working for the
14 Children's Fund.

09:37:19 15 Q. And in the other trips to South Africa were you ever given
16 a package with rough diamonds or stones in it?

17 A. No, I was not.

18 Q. Only this one occasion. And when people give you gifts, if
19 you find out who it is who probably gave you the gift, is it
09:37:40 20 normal that you would send them a thanks of some sort?

21 A. If I know the person very well, and I intend to keep the
22 gift, if it's an occasion, on a birthday, then, yes, I do send
23 thank you notes to thank people who give me gifts or Christmas
24 presents. When it's fans sending me I don't know, I don't
09:38:01 25 normally, no, I don't respond with a thank you.

26 Q. All right, Ms Campbell, thank you very much.

27 A. Thank you.

28 MS HOLLIS: Madam President, I have no further questions.

29 PRESIDING JUDGE: Mr Griffiths, will you be taking

1 cross-examination of this witness?

2 MR GRIFFITHS: Yes, I will, Madam President.

3 PRESIDING JUDGE: Very well, please commence.

4 CROSS-EXAMINATION BY MR GRIFFITHS:

09:38:23 5 Q. Ms Campbell, I certainly don't want to inconvenience you
6 more than you've been inconvenienced already, and I mean that
7 quite sincerely. So I want us to get through this as quickly as
8 possible.

9 Question number one: On that night, neither of the men
09:38:41 10 told you that these diamonds came from Charles Taylor; is that
11 right?

12 A. Correct.

13 Q. Furthermore, the next morning at breakfast, you did not
14 tell either Mia Farrow or Carole White that the men said the
09:38:59 15 diamonds came from Charles Taylor, did you?

16 A. No, I did not.

17 Q. The suggestion about Charles Taylor came from one of them?

18 A. Yes.

19 Q. And so consequently, it is pure speculation that these
09:39:14 20 diamonds came from Charles Taylor; that's correct, isn't it?

21 A. Well, I just assumed that they were.

22 Q. But it's pure speculation, isn't it?

23 A. I just - I don't know, I just assumed that they were.

24 Q. But when either Mia Farrow or Carole White said, "It's
09:39:31 25 probably from Charles Taylor", that was pure speculation, wasn't
26 it?

27 A. I can't speak on the behalf of them but I just - when it
28 was brought up I just said, "Okay, I guess it is".

29 Q. Now, on the same note, had you been to South Africa before?

1 A. Yeah, I'd been there many times. The first time I went was
2 '92 and I've been many times after that, after I met Mr Mandela.

3 Q. And did you know that South Africa is one of the world's
4 biggest producers of diamonds?

09:40:10 5 A. Yes.

6 Q. What about Liberia? Did you know whether Liberia produced
7 diamonds or not?

8 A. I actually never heard of Liberia at that time.

9 Q. Many people haven't until you've turned up today. Now, you
09:40:32 10 appreciate, don't you, that you've been called as a witness by
11 the Prosecution; is that right?

12 A. Yeah.

13 Q. And prior to arriving today, you'd not given them an
14 account of what you were going to say, did you?

09:40:48 15 A. No, I did not.

16 Q. So that this defendant is hearing for the very first time
17 what you, an important witness, is saying about those events in
18 September 1997. Do you appreciate that?

19 A. Correct.

09:41:05 20 Q. Now, we have no basis whatsoever, Ms Campbell, to challenge
21 what you have told these judges because, this is right, isn't it,
22 you were alone in your room that night when the men arrived?

23 A. Correct.

24 Q. You weren't sharing with anyone, were you?

09:41:28 25 A. No, I was not.

26 Q. And what alerted you to the fact that these men were
27 outside?

28 A. They knocked on the door.

29 Q. Did they do anything else?

1 A. No.

2 Q. Now, you've been consistent in your account about these
3 events, haven't you?

4 A. Correct.

09:41:50 5 Q. Because when you were asked on ABC News about this, you
6 immediately and promptly denied that you'd received diamonds from
7 Charles Taylor, didn't you?

8 A. I did.

9 Q. And later, when you arrived on the Oprah Winfrey Show,
09:42:08 10 Oprah recited the transcript of that interview with you, didn't
11 she?

12 A. She did, yes.

13 Q. And you refused to make any comment?

14 A. I did, on the basis that I've said before; that I was
09:42:21 15 afraid for my family.

16 Q. And tell me, when the two men arrived outside your door,
17 was Carole White there?

18 A. I didn't see Carole White, I saw two men. She may have
19 been around the corner, but she was not in front of my face when
09:42:38 20 I opened the door.

21 Q. Now, another detail I'd like your assistance with, and it's
22 this: At any stage on that evening, or night, did you give
23 Charles Taylor your telephone number?

24 A. No, I did not.

09:42:56 25 Q. Did you at any stage that evening communicate with Charles
26 Taylor?

27 A. At the dinner table, yes.

28 Q. After the dinner, did you communicate with him by any
29 means, telephone, text or otherwise?

1 A. No, I did not.

2 Q. Now, how many diamonds or stones were there in that cloth
3 pouch?

4 A. There was a few, two or three, I don't know the exact
09:43:34 5 number. Once I handed them over to Mr Ractliffe I didn't really
6 - it was out of my hands.

7 Q. And how big were they?

8 A. They were very small, and they were dirty looking.

9 Q. When you say very small, are we talking about something,
09:43:50 10 say, the size of a tablet?

11 A. I'm not a diamond expert but - and stones expert, but they
12 were very small. They were small diamonds.

13 Q. I now want to assist you to put some of this account into
14 perspective. We are told by the Prosecution that Nicholas
09:44:17 15 Koumjian, the man talking to Ms Hollis now, contacted Mia Farrow
16 in August of last year. Now, for 13 years, Mia Farrow had never
17 made a mention of this, and did you appreciate that she made a
18 declaration to the Prosecution dated the 9th of November 2009,
19 and guess what, that's exactly two weeks after Carole White
09:44:53 20 launched the lawsuit against you for breach of contract. So
21 she's contacted in August, but it's two weeks after Carole White
22 launches the lawsuit against you that Mia Farrow, for the very
23 first time, puts her signature to a declaration implicating you.
24 Do you follow?

09:45:14 25 A. Yes, I do. I do have a commercial dispute with Carole
26 White. I do not want to speak about it here, I don't want to
27 criticise her.

28 Q. I'm not going to ask you about that. I'm talking about the
29 coincidence of the dates. She is first contacted in August and

1 then guess what, two weeks after Carole White launches the
2 lawsuit she makes this declaration. Do you follow?

3 A. I understand, yes.

09:45:47 4 Q. Now, I'm asking you about that for this reason, and I am
5 not intending to be offensive. You'll see in a moment why I'm
6 asking this question. Are you a boastful person, Ms Campbell?

7 A. Not really. I don't think so.

8 Q. Let me tell you why I'm asking the question. In the
9 declaration signed by Mia Farrow, she says this:

09:46:07 10 "The next morning, when the other guests, my children and
11 I met for breakfast, Naomi Campbell was there and had an
12 unforgettable story. She told us that she had been awakened in
13 the night by knocking at her door, she opened the door to find
14 two or three men, I do not recall how many, who presented her
09:46:32 15 with a large diamond which they said was from Charles Taylor."

16 Detail number one. Did you tell her it was a - a large
17 diamond?

18 A. No, I did not tell the size of the diamonds. I don't
19 believe I even told them how many. No, I didn't - I don't
09:46:55 20 believe I even showed them.

21 Q. Now, the other reason I'm asking you that question is this:
22 Carole White, in interview notes dated the 13th of May of this
23 year, told the Prosecutors this: "The witness does not recall if
24 Ms Campbell told anyone in the guesthouse about the diamonds."

09:47:21 25 Now this: "But knowing Ms Campbell, she feels it unlikely she
26 would have kept it to herself." That is, you're the kind of
27 person who is going to come down to breakfast, just like
28 Mia Farrow said, and start boasting about the gift. Do you
29 follow?

1 A. I understand. I'm someone that lives my life but I'm not
2 about showing what I have.

3 Q. Now, does it surprise you that both Mia Farrow and Carole
4 White appear to be adopting this same attitude towards you; that
09:47:56 5 you're this boastful individual?

6 A. No, it doesn't surprise me at all.

7 Q. Why not?

8 A. I mean, I have no criticism of either one of them but I'm
9 not - I mean, what they have to say is what they have to say.

09:48:10 10 You really have to ask them.

11 Q. Well, the reason why I'm asking you is this, you see, and
12 I promise you it is not my intention to venture into the legal
13 dispute between you and Carole White, but listen to this. Again
14 from the notes of Carole White's interview with the Prosecution:

09:48:31 15 "The witness is currently in litigation against Ms Campbell
16 over a contract dispute. The witness did not even know Mr Taylor
17 was on trial until her attorney, in the breach of contract
18 matter, contacted her back in January or February after seeing
19 something in the news about Naomi Campbell and a blood diamond.
09:48:57 20 He asked the witness if she knew anything about that and the
21 witness told him the story of what had happened."

22 Now this: "He", that is the lawyer, "urged her", that is
23 Carole White, "to come forward because it might be important."

24 Now, why do you think this story about alleged diamonds in
09:49:24 25 South Africa might be important to this woman who is suing you?

26 A. Well, for obvious reasons, which I don't want to speak
27 about here, and I will leave it to the courts in New York to deal
28 with.

29 Q. But, Ms Campbell, it's quite clear --

1 A. Well, you can read between the lines, yes.

2 Q. This is a woman who has a powerful motive to lie about you.

3 A. It's someone I trusted and worked with, and someone I no
4 longer trust and no longer work with.

09:49:58 5 Q. Someone - you were nodding your head earlier, but the nod
6 doesn't appear on the transcript. This is someone with a
7 powerful motive to lie about you.

8 A. Correct.

9 Q. Now, I want to give you the opportunity, Ms Campbell,
09:50:25 10 because perhaps you have never seen the - well, they're not
11 statements - the accounts given by either Mia Farrow or Carole
12 White, so let me just take a moment with you and let's start,
13 first of all, with Carole White's account.

14 As I say, this interview was conducted with her on the 13th
09:50:52 15 of May of this year in London. She, first of all, sets out the
16 nature of her relationship with you: "Witness first met Naomi
17 Campbell when Ms Campbell was 19 years old?"

18 PRESIDING JUDGE: Mr Griffiths, where are you reading from?

19 MR GRIFFITHS: I'm reading from the interview notes with -
09:51:15 20 it's not in my cross-examination bundle. This is part of the
21 disclosure from - this is part of - this is an annex to the
22 application made by the Prosecution for leave to call three
23 additional rebuttal witnesses.

24 PRESIDING JUDGE: Very well. Go ahead, please.

09:51:42 25 MR GRIFFITHS:

26 Q. "Witness first met Naomi Campbell when Ms Campbell was 19
27 years old. And the witness became her agent from approximately
28 1992 until 2006 when they began working together. Ms Campbell's
29 home agency was Elite Model Management in New York. The witness

1 was with Elite Premier Agency in London and worked very hard to
2 promote Ms Campbell, becoming the biggest billing agent in the
3 world for her and what is known in the industry as her 'mother
4 agent'. The two women became quite close over the years and the
09:52:27 5 witness often travelled with Ms Campbell, even if the job was
6 another agent's job, acting a bit like a chaperone to
7 Ms Campbell.

8 One such trip was to South Africa for the inauguration of
9 the Blue Train, which was similar to the Orient Express in South
09:52:48 10 Africa, travelling from Pretoria to Cape Town. Ms Campbell was
11 invited by President Nelson Mandela to ride the train to help
12 raise funds for the Nelson Mandela Children's Fund. Ms Campbell
13 did a lot of work for the Children's Fund and became a member,
14 which meant she gave \$50,000 a year to the fund."

09:53:12 15 Is that correct?

16 A. That's correct, plus fundraising.

17 Q. Thank you.

18 "The witness and Ms Campbell flew into Johannesburg for the
19 event. They stayed at the presidential guesthouse in Pretoria
09:53:27 20 before the train trip."

21 Is that correct?

22 A. That's correct.

23 Q. So she was staying in the same building?

24 A. She was staying, like, two doors down from my room.

09:53:39 25 Q. And then the witness goes on to describe the premises,
26 which I need not bother with, and mentions that there were guards
27 in dress uniform during the day. And then this:

28 "That night, Mr Mandela had a dinner at the guesthouse
29 which the witness and Ms Campbell attended. Also in attendance

1 was Charles Taylor. The witness remembers being told by
2 Ms Campbell that Graca Machel, Mr Mandela's future wife, was
3 annoyed that Charles Taylor was invited to the dinner. The
4 witness was fairly certain that Ms Machel did not attend the
09:54:24 5 dinner."

6 Now, did you tell Carole White that Nelson Mandela's wife
7 was annoyed that Charles Taylor had been invited to the dinner?

8 A. No, I did not. That's something I wouldn't know, and I
9 don't believe that happened.

09:54:41 10 Q. Because you'd never met the man before, had you?

11 A. No.

12 Q. You knew nothing at all about him?

13 A. I didn't know who he was or - and I don't think some - I
14 don't think that someone would have discussed that with

09:54:54 15 Carole White.

16 Q. And, quite bluntly, Carole White is lying about this, isn't
17 she?

18 A. Well, I'm closer to them and I didn't know, I'm not sure
19 how she would know that.

09:55:08 20 Q. But you didn't tell her that, did you?

21 A. No, I did not.

22 Q. Then this:

23 "The witness remembers that there were probably about eight
24 to ten people sitting at their table at the dinner. Mr Taylor
09:55:26 25 sat next to Ms Campbell."

26 Is that true?

27 A. No, I remember Mr Jones was next to me and he was on the
28 other side of Mr Jones, and I was - on my right Mr Mandela.

29 Q. "Mr Taylor sat next to Ms Campbell. On Ms Campbell's other

1 side was one of Mr Taylor's government officials, perhaps his
2 defence minister, but the witness was not sure."

3 So she's got you sandwiched between Charles Taylor and a
4 member of his entourage, not between Nelson Mandela and Quincy
09:56:07 5 Jones.

6 A. No, that's not where I sat. I sat next to Mr Mandela.

7 Q. But hold on, Ms Campbell, it gets even better than that,
8 because later on in this statement, Ms White says this:

9 "The witness" - that's Carole White - "said that throughout
09:56:24 10 the dinner, Ms Campbell and Mr Taylor were mildly flirtatious
11 with each other. The witness heard Mr Taylor tell Ms Campbell
12 that he was going to send her diamonds. Taylor and his people
13 were staying some distance away, so it was arranged that he would
14 send some men back with the gift."

09:56:50 15 Is that true or false?

16 A. That's not true at all.

17 Q. It's a lie, isn't it?

18 A. My - I was sat next to Mr Mandela and the conversations -
19 if there was a conversation about diamonds, it wasn't to me. We
09:57:05 20 spoke about what I was doing for the Children's Fund. I remember
21 Mr Mandela explained to Mr Taylor what I did for the Children's
22 Fund.

23 Q. Because this morning you've already told us that you did
24 not specifically speak to Charles Taylor that evening, did you?

09:57:23 25 A. I spoke in general. I was interested about Liberia,
26 I never heard of it before, and he said he was the President of
27 Liberia.

28 Q. But you flirting with Charles Taylor, that's a complete
29 lie, isn't it?

1 A. When - as I said before, when I'm with Mr Mandela, and
2 I think everyone in the world feels the same way, my attention
3 and focus is with him, and it's an honour to be in his presence
4 and to be with him in his house.

09:57:51 5 Q. Forgive me if I press you a little further on this,
6 Ms Campbell, but I would like a straight answer. This is a lie,
7 isn't it?

8 A. Correct.

9 Q. Thank you. Now this: Do you remember me asking you right
09:58:07 10 at the outset whether you gave Charles Taylor your telephone
11 number?

12 A. Correct.

13 Q. Listen to this: "Ms Campbell seemed excited about the
14 diamonds and she kept talking about them with the witness."

09:58:22 15 That's with Carole White.

16 A. Mm-hm.

17 Q. "After this dinner, Ms Campbell and Mr Taylor were somehow
18 in communication."

19 A. No, I didn't have any communication at all.

09:58:34 20 Q. So again, this is a lie --

21 A. And I didn't give my phone number.

22 Q. Again, this is a lie, isn't it?

23 A. It's not accurate, no.

24 Q. Nodding of the head doesn't go down on the record.

09:58:48 25 A. No, it's not.

26 Q. It's a lie, isn't it?

27 A. Correct.

28 Q. Thank you. Then this:

29 "That night, it got to be very late and all of the guests

1 had retired to their rooms. The witness heard something hitting
2 her window that sounded like pebbles, and she looked outside and
3 saw two men. The men said they had something for Ms Campbell.
4 The witness did not know how they knew which room to alert or if
09:59:24 5 they just happened to pick a window that turned out to be hers.
6 She alerted Ms Campbell who was excited and wanted to open the
7 doors. But the witness was nervous to let the men in, as all the
8 other guests had retired and there seemed to be no guards or
9 staff present. After looking unsuccessfully for any guards, the
09:59:52 10 witness" - that's Carole White - "let the men in herself.
11 Ms Campbell was in her nightdress but had a big cashmere shawl
12 around her. The witness gave the two men Coca-Colas and sat them
13 down and sat with them and Ms Campbell. The men gave Ms Campbell
14 a scrubby piece of paper, which Ms Campbell opened. Inside were
10:00:24 15 what looked to be about six small greyish pebbles but there could
16 have been five to eight, the witness didn't really remember. The
17 witness thought Ms Campbell was disappointed because she thought
18 she was going to get a big shiny diamond and these just looked
19 like pebbles."

10:00:46 20 Is there any truth in any of that?

21 A. I did think they looked like pebbles, but she was not with
22 me when I received them. I was in my bed sleeping. I do travel
23 with a cashmere shawl, which she knows. The thing about the
24 windows, I don't know about that.

10:01:06 25 Q. But let's just take --

26 A. And I recall it being cloth, but it's 13 years ago.

27 Q. Let's just take it in stages. Who opened the door to let
28 them in - to the men when they knocked?

29 A. To my bedroom door? I opened my bedroom door.

1 Q. Did Ms White open it?

2 A. No, she was not in my room.

3 Q. So Ms White is lying about that, isn't she?

4 A. Yes.

10:01:29 5 Q. Likewise, were the men invited in to sit down and have
6 Coca-Colas?

7 A. I don't know. I was sleeping.

8 Q. Yeah, but did you invite the men into your room and offer
9 them Coca-Colas?

10:01:44 10 A. No, I did not.

11 Q. And did you open the package that night and look at the
12 contents?

13 A. No, I opened it in the morning and looked at the contents.

14 Q. So she is lying about that as well, isn't she?

10:01:57 15 A. Correct.

16 Q. And this detail, "The witness thought Ms Campbell was
17 disappointed", were you expressing any sense of disappointment to
18 Carole White?

19 A. No, I did not, because, as I said before, when I'm there to
10:02:15 20 raise funds for a charity and I'm working, I would never have
21 kept anything like that - that if I could give it to raise money
22 for the children, that's what I would do and that's what I did.
23 That was my intention.

24 Q. Now, also this:

10:02:31 25 "The witness thought about the diamonds all night." That's
26 Carole White. "She knew it was illegal to take diamonds out of
27 South Africa, although she doesn't really know how she knew
28 that."

29 Now, pausing there. Was that something within your

1 knowl edge?

2 A. No.

3 Q. And did Carole White discuss with you or suggest to you
4 that you were acting in some way illegally --

10:03:01 5 A. No.

6 Q. -- by accepting this gift?

7 A. No, she didn't.

8 Q. "The next morning, the witness and Ms Campbell and others
9 boarded the Blue Train." Now, just help me with this detail:

10:03:24 10 You told us you were late for breakfast the following morning.

11 A. I'm always late, so.

12 Q. And when you went downstairs, just picture the scene at
13 breakfast for us. Were Mia Farrow and your then agent,
14 Carole White, sitting together at the breakfast table?

10:03:43 15 A. Yeah, I think some people had had their breakfast, like
16 I said before, and some were still to come down.

17 Q. But the two of them were sitting together?

18 A. Were at the breakfast table.

19 Q. And you went and joined them?

10:03:55 20 A. Correct.

21 Q. Now, what she says is this:

22 "... boarded the Blue Train. The witness knew they had the
23 diamonds and she figured that she would probably be the one who
24 wound up holding them and carrying them. She told Ms Campbell
10:04:12 25 that she didn't think they should keep the diamonds, it could
26 result in a scandal or even prison."

27 A. It's not correct because I looked for Jeremy. I had them
28 and I gave them to Jeremy Ractliffe.

29 Q. But just taking matters in stages, did you have any such

1 conversation with Carole White?

2 A. No.

3 Q. "The witness and Ms Campbell discussed the matter and
4 decided to give the diamonds to Mr Mandela's charity, because
10:04:44 5 they could do some good. That evening or the next day, the
6 witness and Ms Campbell went to see Jeremy Ractliffe in the train
7 compartment he was sharing with his wife."

8 Is that correct?

9 A. No, I gave the stones to Jeremy. When I got on the train,
10:05:03 10 immediately I looked for him and gave them but I'm not - as
11 I said a bit earlier, I don't recall if I gave them - because I'm
12 not remembering if he was at the house to pick us up or if he met
13 us at the train station.

14 Q. "Mr Ractliffe ran the Children's Fund at that time. The
10:05:21 15 witness, Ms Campbell, and Mr and Mrs Ractliffe were in the
16 compartment when Ms Campbell gave the diamonds to Mr Ractliffe
17 who was horrified, but he reluctantly took them."

18 Was Carole White present when you gave the pebbles --

19 A. I don't recall that she was but she could have been but I
10:05:43 20 don't recall. It was 13 years ago.

21 Q. Now, let us take a couple of minutes to look --

22 PRESIDING JUDGE: Actually, Mr Griffiths, I'm interested to
23 establish whether it is true that Mr Ractliffe was horrified. Is
24 it true?

10:06:09 25 THE WITNESS: Sorry, could you repeat the question?

26 PRESIDING JUDGE: Was Mr Ractliffe horrified by the pouch
27 that you handed to him?

28 THE WITNESS: He wasn't - he didn't express that he was
29 horrified to me.

1 PRESIDING JUDGE: You mean he was not disturbed by you
2 handing him unprocessed diamonds?

3 THE WITNESS: No, he took - I asked him to take them and do
4 something good with them. He's someone that I trust and I'd
10:06:35 5 known for a while and I believed that's what he would do.

6 MR GRIFFITHS: Can I continue now, Madam President?

7 Q. Now, let's have a look at the declaration of Mia Farrow,
8 shall we? I have already mentioned that it is dated 9 November
9 2009:

10:06:57 10 "I was contacted by Nicholas Koumjian, a Prosecutor for the
11 Special Court for Sierra Leone, by email on 10 August 2009 and
12 asked if I would consent to speak by phone.

13 I gave Mr Koumjian my phone number. He called and asked me
14 if I recalled meeting Charles Taylor in South Africa and I said
10:07:23 15 I did.

16 He then asked what I recalled about that meeting, and
17 I explained that I had limited contact with Mr Taylor but was
18 happy to relate what I remembered. I travelled to South Africa
19 for an event to raise money for Nelson Mandela's children's
10:07:42 20 charities, at the invitation of the then President of South
21 Africa, Nelson Mandela. I believe this was about 1997.

22 Other guests at the event that I recall included Naomi
23 Campbell, Quincy Jones and Jemima and Imran Khan. We were all
24 staying at the government guesthouse in Pretoria.

10:08:08 25 I remember arriving at the residence of President Mandela
26 for a dinner party. There were others present, when my children
27 and I arrived. I was introduced by Graca Machel, now the wife of
28 Nelson Mandela, to Charles Taylor, President of Liberia.

29 A photographer moved towards us, but Ms Machel quickly

1 moved me away from Mr Taylor, whispering words to the effect, 'We
2 do not want you to be photographed with this man. He should have
3 left. We are trying to get him to leave.' "

4 Now, do you recall at any stage that evening anyone telling
10:08:49 5 you that you shouldn't be photographed with Charles Taylor?

6 A. No, I don't recall it.

7 Q. Because in fact a photograph was taken, wasn't it?

8 A. A group photo, correct.

9 Q. And that's you, is it not, standing next to Charles Taylor
10:09:05 10 and President Mandela?

11 A. Correct.

12 Q. Is that right?

13 A. Uh-huh.

14 PRESIDING JUDGE: Mr Griffiths, that's the kind of picture
10:09:11 15 that should be on the overhead. We don't know what you're
16 showing the witness.

17 MR GRIFFITHS: Very well. I think we served a copy on
18 Court Management and your Honours should have a copy of that
19 photograph in this blue bundle behind the third sticker.

10:09:33 20 THE WITNESS: I've seen the picture. I know it.

21 PRESIDING JUDGE: Please put it on the overhead for the
22 public to see.

23 MR GRIFFITHS:

24 Q. Do you remember the photograph, Ms Campbell?

10:10:06 25 A. I do.

26 Q. Well, normally in these proceedings, one would get a
27 witness to change places and write the names of each individual,
28 but I think we can recognise virtually everyone in that
29 photograph?

1 A. Yeah.

2 Q. So I won't bother. Now, do you recall anyone telling you
3 not to be photographed with --

10:10:29

4 PRESIDING JUDGE: Mr Griffiths, whilst you and the witness
5 are privy to the identities of these people, the judges certainly
6 are not.

7 MR GRIFFITHS: [Microphone not activated].

8 PRESIDING JUDGE: Yes we do, and I would appreciate that
9 the identities of these people are put on the record.

10:10:46

10 MR GRIFFITHS: Very well.

11 Q. Let's go from left to right, please, Ms Campbell.

12 A. Okay.

13 Q. The female with the long hair, who is that?

14 A. Jemima Khan.

10:11:01

15 Q. Yes?

16 A. And then Imran Khan.

17 Q. Yes?

18 A. And then me.

19 Q. Yes?

10:11:11

20 A. Charles Taylor.

21 Q. Yes?

22 A. Mr Mandela, then President Mandela.

23 Q. Yes?

10:11:40

24 A. Graca Machel. I don't - I don't remember her name. She
25 was the partner of Mr Jones at the time.

26 Q. Yes?

27 A. And Mr Quincy Jones, Jemima Khan --

28 PRESIDING JUDGE: Please pause. Please pause, Ms Campbell.

29 I'm asking the Court Manager to ensure that there is a copy

1 on the overhead whilst the witness is speaking. That's the way
2 we normally do it. Now, I appreciate that she was writing
3 something on another copy but there should be a copy on the
4 overhead so that we all follow the evidence.

10:12:20 5 MR GRIFFITHS: They do have two copies available, Madam
6 President.

7 PRESIDING JUDGE: Why wasn't it displayed? Why wasn't it
8 being displayed while the witness was speaking?

9 MS IRURA: Much obliged, your Honour.

10:12:38 10 PRESIDING JUDGE: So what is happening? Was the witness
11 writing the names or what was happening?

12 MR GRIFFITHS: The witness was writing the names on the
13 copy before her and I think there were a couple of unidentified
14 individuals but, beyond that, the witness had successfully
10:12:55 15 identified all the others present in this photograph.

16 Q. Is that right, Ms Campbell?

17 A. Correct.

18 Q. And just so that we know, and I'm sorry to inconvenience
19 you, but I wonder if you could just change places with the Court
10:13:14 20 Manager, just for a moment, and, for everybody's benefit, just
21 using your finger this time rather than writing, just starting
22 from left to right, who is who?

23 A. Jemima Khan, Imran Khan, myself, Charles Taylor,
24 Mr Mandela, Graca Machel, the partner of Mr Jones at the time,
10:13:39 25 Mr Quincy Jones, Mia Farrow, and I can't - I don't recall his
26 name.

27 Q. Thank you very much. You can retake your seat, please.
28 Now, we have a procedure which we have to adopt in this Court,
29 Ms Campbell. I wonder if you could sign the back of the copy

1 that you marked?

2 A. Of course.

3 Q. And put today's date, which is 5 August.

4 Madam President, could I ask for that to be marked for
10:14:16 5 identification, please, MFI-1?

6 PRESIDING JUDGE: It will have to be MFI-11. As you know,
7 we have 10 MFIs before it that are pending. So that document,
8 the photograph that has been marked by the witness, will be
9 marked MFI-11.

10:14:37 10 MR GRIFFITHS: I'm grateful.

11 Q. Now, the witness continued in this way, Ms Campbell:

12 "I did not have further contact with Mr Taylor and I
13 believe he may have departed before the dinner.

14 The next morning, when the other guests, my children and
10:14:56 15 I met for breakfast, Naomi Campbell was there and had an
16 unforgettable story. She told us that she had been awakened in
17 the night by knocking at her door. She opened the door to find
18 two or three men, I do not recall how many, who presented her
19 with a large diamond which they said was from Charles Taylor."

10:15:23 20 Now, that's not correct, is it?

21 A. No, because he was at the dinner, and I didn't tell her a
22 size of the diamond, but I did tell her of the events of my door
23 being knocked upon.

24 Q. Did you tell her about the number of the pebbles that you
10:15:45 25 received?

26 A. No.

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

1 Did you have such a discussion at the breakfast table with
2 Mia Farrow?

3 A. No, not about what I was - my intentions was to find
4 Jeremy. I hadn't told her that.

10:16:16 5 Q. Now, just to be quite clear about this: Are you saying you
6 never had a discussion with Mia Farrow about what you were going
7 to do with those pebbles?

8 A. No, not until I found Jeremy, I did not discuss, because
9 I hadn't found him at that point so I didn't know, you know.

10:16:34 10 Q. So remember right when we started, I indicated to you the
11 coincidence of Mia Farrow making this declaration two weeks after
12 Carole White started the lawsuit. Now, may you have had a
13 discussion with Carole White about what you were going to do with
14 the pebbles?

10:16:57 15 A. That's possible.

16 Q. So if you didn't have such a discussion with Mia Farrow,
17 where do you think Mia Farrow got this from?

18 A. I don't know, but I didn't discuss with her.

19 Q. But if you didn't discuss with Mia Farrow but you may have
10:17:11 20 discussed with Carole White, apart from the Ractliffes, did you
21 discuss this donation with anybody else?

22 A. No, I did not.

23 Q. So where did Mia Farrow get this from?

24 A. I don't know.

10:17:24 25 Q. It wasn't from you?

26 A. It was not from me, no. I just met Mia Farrow, so it's not
27 something I would say to her; what I'm going to do and what my
28 relations was with Jeremy.

29 Q. Now, did you that morning identify the pebbles as diamonds?

1 A. No, at the table someone said that - Charles Taylor's name
2 came up and said, "It has to be him", and that they were
3 diamonds, and, as I said before, I don't remember which one of
4 the two.

10:18:00 5 Q. Tell me, do you know of any connection between Mia Farrow
6 and Carole White?

7 A. I wouldn't know, because I'm no longer working with Carole
8 White, so I don't know if there is a connection. I mean,
9 Mia Farrow has tried to contact me, but I've refused to speak
10:18:18 10 with her, and it's possible that they speak. I really don't
11 know.

12 MR GRIFFITHS: There is one final matter that I'd like to
13 deal with. I wonder if, Madam Court Manager, you could hand this
14 to Ms Hollis, please.

10:19:02 15 Q. Now, the final matter I want to deal with with you,
16 Ms Campbell, is simply this: Do you know if those diamonds were
17 - let me start again. Do you know whether the Nelson Mandela
18 Children's Fund benefited from those diamonds?

19 A. No, because up until last year I had never spoken to Jeremy
10:19:28 20 about them after I'd given them to him, and he still has them, so
21 they didn't benefit.

22 MR GRIFFITHS: Can the witness be shown the documents
23 behind the first tab in this little blue bundle?

24 PRESIDING JUDGE: Is that the Defence bundle?

10:19:59 25 MR GRIFFITHS: Madam President, yes.

26 Q. Now, the first item behind that, in that document, in that
27 folder, is a news item from ABC News. I'm not interested in the
28 first page, Ms Campbell. Can we go quickly to the second page,
29 please. If you look just below halfway on that page, do you see

1 a paragraph which reads as follows: "The donor relations manager
2 for the Nelson Mandela Children's Fund, Mpaki Pule, said that" --

3 PRESIDING JUDGE: Please pause. We need this on the
4 overhead. Thank you.

10:20:48

5 MR GRIFFITHS:

6 Q. "The donor relations manager for the Nelson Mandela
7 Children's Fund, Mpaki Pule, said there is no record the charity
8 received the diamond from Campbell. She did make cash
9 contributions of \$50,000 that year and the year before, the
10 charity officer said?"

10:21:10

11 JUDGE LUSSICK: "The year after".

12 MR GRIFFITHS:

13 Q. "The year after", I'm grateful, "the charity officer said."

14 Now, behind that on the next page, Ms Campbell, do you see a

10:21:23

15 letter bearing the letterhead of the Nelson Mandela Children's
16 Fund?

17 A. Yes.

18 Q. And you'll see it's dated the 4th of August and it's

19 addressed to me.

10:21:36

20 A. Yes.

21 Q. "Dear Mr Griffiths, Prosecutor versus Charles Ghankay

22 Taylor. I am the chief executive officer of the Nelson Mandela

23 Children's Fund. With regard to your inquiry whether or not the

24 NMCF ever received a donation of a diamond or diamonds from

10:21:58

25 Ms Campbell, I can categorically state that the NMCF has never

26 received any donation of a diamond or diamonds from Ms Campbell

27 or from anyone else. It would have been improper and illegal to

28 have done so."

29 Now, as far as you're aware, you tell us, Mr Ractliffe

1 still has the diamonds?

2 A. That's correct, he's told that to my lawyers.

3 MR GRIFFITHS: Could I have a moment, please, Madam
4 President? I have no further questions.

10:22:45 5 PRESIDING JUDGE: Ms Hollis, do you have any questions in
6 re-examination?

7 MR GRIFFITHS: My apologies, Madam President, before I sit
8 down, could I ask, please, that those two documents, the ABC News
9 article and the letter from the Nelson Mandela Children's Fund,
10:23:09 10 be marked for identification MFI-12A and B; A being the ABC News
11 article, B being the Nelson Mandela Children's Fund letter.

12 PRESIDING JUDGE: Very well, the two documents are so
13 marked.

14 MR GRIFFITHS: I'm grateful.

10:23:30 15 PRESIDING JUDGE: Ms Hollis, any questions in
16 re-examination?

17 MS HOLLIS: Thank you, Madam President.

18 RE-EXAMINATION BY MS HOLLIS:

19 Q. Ms Campbell, just a few questions for you. The Defence
10:23:49 20 counsel asked you about your appearance on the Oprah Winfrey
21 Show, do you recall?

22 A. Yes.

23 Q. And that Oprah Winfrey had reminded you of the ABC
24 interview and that you had refused to make comment; correct?

10:24:01 25 A. Correct.

26 Q. And tell us why --

27 A. She showed it to me actually. She showed it to me, yeah.

28 Q. And tell us why you refused to make comment on that.

29 A. As I said before, I did not - I felt that my family --

1 MR GRIFFITHS: Excuse me, I do have an objection.

2 PRESIDING JUDGE: Yes, Mr Griffiths.

3 MR GRIFFITHS: I do have an objection to this line of
4 questioning, for this simple reason: The witness is here to give
10:24:28 5 evidence about her supposed possession and gift of diamonds from
6 this defendant. That's the Prosecution allegation.

7 What my learned friend is now seeking to do is to obtain,
8 through the mouth of this witness, evidence maligning the
9 character of Mr Taylor when the witness is in no position to give
10:24:52 10 evidence about that. The witness has made quite clear her
11 thoughts about Mr Taylor and his supposed killing of thousands of
12 people, she obtained that information from the internet. And I
13 know that my learned friend is now seeking to elicit from the
14 witness the suggestion that she is afraid of Mr Taylor because of
10:25:15 15 that acquired knowledge. In our submission, it is totally
16 irrelevant to the issues raised by the testimony of this witness.

17 PRESIDING JUDGE: Ms Hollis, what is your response?

18 MS HOLLIS: I am following up on a line of questioning that
19 the Defence counsel chose to pursue and the witness answered as
10:25:37 20 to why she declined to comment on something, and her state of
21 mind in relation to this accused may be relevant, very relevant,
22 to issues that your Honours have to determine, and that is the
23 credibility of the evidence before you.

24 So it is the Defence who went into this. As to her
10:25:53 25 declining to comment, she indicated in response, "I did on the
26 basis I said before." I'm simply following up with her what that
27 is, and I believe that the Prosecution is entitled to do that.

28 PRESIDING JUDGE: Please pause. Let me consult.

29 [Trial Chamber conferred]

1 The Defence objection is overruled on the grounds that this
2 is a matter that arose during cross-examination and is rightfully
3 a matter for re-examination.

4 MS HOLLIS: Thank you, Madam President.

10:26:40 5 Q. Ms Campbell, let me again orient you. We were talking
6 about your appearance on the Oprah Winfrey Show and Defence
7 counsel asking you that you declined to make comment about the
8 ABC interview. In response to that you told Defence counsel that
9 you did, that is, decline to make comment, on the basis you said
10:27:01 10 before. Please tell us why you declined to make a comment.

11 A. As I said on Oprah, when I was shown the footage, first of
12 all, I was there to celebrate my 25 years, I was not really there
13 to talk about the situation of ABC, and I felt that my family's
14 life was in danger. And as I said before to you, I read that
10:27:26 15 supposedly thousands of people had been killed and I didn't want
16 my mother or my family to be in any danger.

17 Q. And, Ms Campbell, this concern that you had, is it correct
18 that it was based on your belief, your later belief, that it was
19 Charles Taylor who gave you these diamonds?

10:27:50 20 A. It's what I read.

21 Q. And the concern about talking about it, is it correct that
22 it was based on your later belief that Charles Taylor gave you
23 these diamonds?

24 A. Yes, my concern was what I read that allegedly had taken
10:28:05 25 place in the past, so I think it [microphone not activated] --

26 Q. And why did that make you concerned?

27 PRESIDING JUDGE: Sorry, Ms Hollis, sorry, the witness's
28 answer was not completely captured on the record and I think it's
29 my fault because I had the gavel on. But the witness said "it's

1 because of what I read", read where?

2 THE WITNESS: Oh, sorry, read in internet, read papers,
3 heard from friends.

4 MS HOLLIS:

10:28:41 5 Q. So based on what you had read --

6 A. Obviously after my lawyers were called up and I was asked
7 to testify and I said I didn't want to be involved, I read, you
8 know, like anybody would.

9 Q. And so after you had read, then that gave you concern about
10:29:00 10 coming to this Court and talking about these events?

11 A. That's exactly why I didn't want to come here.

12 Q. Now, the Defence counsel also asked you about this lawsuit
13 between you and Carole White; correct?

14 A. Correct.

10:29:15 15 Q. And she filed a lawsuit and you filed a counterclaim; is
16 that right?

17 A. Correct.

18 Q. Now, in the lawsuit --

19 A. I'm not going to discuss it. I don't think it's correct to
10:29:24 20 discuss it here.

21 Q. I do have one question that perhaps you'll be able to
22 answer, and it goes to the Defence counsel's questions to you
23 about the timing of statements by Mia Farrow and declarations.
24 And I simply want to ask you this, I'm not interested in the
10:29:41 25 merits of this, okay?

26 A. Oh, okay.

27 Q. But what I want to ask you is this: In the lawsuit that
28 was filed by Carole White --

29 A. And her brother.

1 Q. And her brother. Was the name Mia Farrow mentioned in that
2 lawsuit?

3 A. Actually, I really don't know. You'd have to speak to my
4 lawyers about that. It's possible but I don't - it's very -
10:30:03 5 there's a huge pile of papers, about 60 or 70 stacks of pages, so
6 for that - for me to answer you to that, I wouldn't know. You'd
7 have to ask my lawyers.

8 Q. Fair enough. And in the countersuit that you filed, did
9 you include Mia Farrow in that lawsuit at all?

10:30:26 10 A. So far, no, I don't believe I have, but again, I've been
11 speaking to my lawyers so many times on this it's possible I
12 have. You'd have to ask them really.

13 Q. All right. Thank you. The Defence counsel also put to you
14 that it was pure speculation that the diamond was from Charles
10:30:48 15 Taylor. And you said that you had assumed that it was from
16 Charles Taylor. Do you remember telling the Defence counsel
17 that?

18 A. Yes, I do.

19 Q. Ms Campbell, has anyone identified himself or herself as
10:31:03 20 the person who gave you that diamond or those diamonds?

21 A. No, never.

22 Q. Now, you were shown a photograph and you wrote some names
23 on that photograph. Could I see the photograph that has been
24 marked for identification, please?

10:31:33 25 So if the witness could be shown that, it could be put on
26 the overhead, please. Just put that one on the overhead, the one
27 that's marked. Put that on the overhead, please.

28 And, Ms Campbell, we look at this photograph and Charles
29 Taylor is standing between you and Nelson Mandela; correct?

1 A. Correct.

2 Q. And do you remember when this photograph was taken?

3 A. Oh, it's either before or after the dinner, but I can't
4 recall, it's so long ago. I don't know.

10:33:00 5 Q. So it was in connection with the dinner?

6 A. Yeah.

7 Q. All right. That can be removed. And then if we could
8 please look at the document that has been marked 12B.

9 Ms Campbell, you remember that Defence counsel read to you
10:33:30 10 the statement that was obtained from Carole White?

11 A. Correct.

12 Q. And you recall that he read to you the portion that
13 indicated that when the diamonds were given to Mr Ractliffe he
14 was horrified. You remember him reading that part to you?

10:33:46 15 A. Correct, I remember.

16 Q. And if we could look at tab 2, that's MFI-12B, please. And
17 if we look at this, we see that at the last sentence of the first
18 paragraph, it says: "It would have been improper and illegal to
19 have done so." And the writer of this document is referring to
10:34:19 20 receiving diamond or diamonds from you, and the writer indicates
21 it would have been improper and illegal to have done so.

22 Ms Campbell, are you aware of any laws in South Africa in
23 September of 1997 which would have made it illegal to possess
24 unprocessed diamonds?

10:34:39 25 A. No, I was not aware.

26 Q. Mr Ractliffe, you said that at the time you gave him these
27 diamonds, he was in charge or managing this fund. Where did he
28 live at that time?

29 A. I don't know. In South Africa.

1 Q. In South Africa?

2 A. Yeah.

3 Q. Would Mr Ractliffe have been aware of any such laws?

10:35:05

4 A. I don't know. Maybe. I don't know. You'd have to ask
5 him.

6 Q. And if it were illegal to receive such diamonds, that could
7 account for his being horrified; isn't that correct?

8 A. I don't recall him being horrified. Otherwise I don't
9 think he would have taken them at all.

10:35:18

10 Q. When you asked Mr Ractliffe to accept these diamonds, did
11 he indicate any concern to you about accepting them?

12 A. Not that I can remember. He may have said something to me,
13 very possible, yes, but I don't remember what it was.

10:35:37

14 Q. And you - when you spoke to him more recently and he
15 indicated he still had the diamonds, did he explain why he still
16 had the diamonds?

10:35:55

17 A. I think because there was not enough time, as I said,
18 because we got in in, like, I don't know - we got in the same day
19 of the benefit, which was at night, I remember - I recall, in
20 Cape Town, at the end of the train ride, so I don't think he had
21 enough time.

22 Q. You gave him the diamonds in 1997; correct?

23 A. Correct, whatever I got - yeah.

10:36:12

24 Q. You indicated you spoke to him last year and he still had
25 the diamonds?

26 A. Last year.

27 Q. So that would have been what, my math is not good, 12 years
28 later?

29 A. Correct. I only contacted him when you contacted my

1 lawyers.

2 Q. So in 12 years you're saying he wouldn't have had time to
3 have processed those diamonds?

10:36:33

4 A. I have no - once I gave them to Jeremy they were out of my
5 hands. I didn't really care what he did with them, as long as he
6 did something good is what I trusted him to do.

7 Q. So he never explained why 12 years later he still had them?

8 A. You'd have to ask him.

9 Q. Did he offer to give them back to you?

10:36:49

10 A. No. I didn't ask for them back and --

11 Q. Did he indicate what, if anything, he was going to do with
12 them after your phone call to him?

13 A. I really don't know. You'd have to speak to him about
14 that.

10:36:59

15 Q. And just to clarify one thing, so the record is very clear,
16 these men who came to your door, are we talking about the door to
17 the lodge or are we talking about the door to your room?

18 A. To my room. The door to my room.

19 Q. The door to your room on the second floor of that building?

10:37:17

20 A. The door to my room; I don't remember what floor I was on,
21 but the door to my room.

22 Q. And also, could you help us: Do you know how to spell
23 Mr Ractliffe's last name?

24 A. R-A-T-C-L-I-F-F-E [sic].

10:37:33

25 Q. Now today, as we are in this courtroom, are you aware of
26 any laws that were in existence in 1997 regarding the possession
27 of unprocessed diamonds?

28 A. No, I was not aware.

29 Q. As we are in court today, are you aware of such laws?

1 A. As I'm - yes, today, yes, obviously.

2 Q. And you were informed about that by your attorneys; is that
3 correct?

10:38:05

4 A. Correct. And I'd heard about the term "blood diamonds" in
5 like, what, 2003.

6 Q. So in 1997 when you received these diamonds you had not
7 heard of blood diamonds?

8 A. Well, blood diamonds didn't exist in 1997, I understand.

10:38:18

9 Q. So when you received this pouch and were told they were
10 possible diamonds, your reaction wasn't that it was something
11 illegal; is that right?

12 A. No.

10:38:32

13 Q. And these pebbles again, just to be clear, because you've
14 been asked about this on direct [sic] examination, these pebbles
15 or stones, what was it about receiving stones that made you tell
16 the people at the breakfast table about that?

10:38:49

17 A. Well, as I said before, I was there to raise funds for the
18 Nelson Mandela Children's Fund. I didn't think it would have
19 been honest of me to have kept them. I thought that the charity
20 should benefit from them. I wouldn't have been there otherwise.
21 I was there for the charity. So that's why I wanted them to go
22 to the charity.

10:39:02

23 Q. I understand that. At the breakfast table, what was it
24 about these pebbles or stones that made it of interest for you to
25 tell these people?

26 A. It wasn't about the pebbles or stones themselves, it was
27 about the way I was woken up.

28 Q. Ms Campbell, isn't it correct that your account today is
29 not entirely truthful because of your fear of Charles Taylor?

1 A. No, that's not correct. I'm --

2 MR GRIFFITHS: Madam President, that is cross-examination,
3 an attempt to impeach one's own witness. In our submission, it
4 is totally improper.

10:39:47 5 PRESIDING JUDGE: Yes, Ms Hollis. It is improper. It is
6 improper to impeach your own witness by saying that her account
7 is not totally truthful.

8 MS HOLLIS: I accept that.

9 PRESIDING JUDGE: And you know the procedure, surely.

10:40:04 10 MS HOLLIS: May I put on the record our position on that,
11 Madam President, simply for the record? May I be allowed?

12 PRESIDING JUDGE: For what it's worth, but I've made the
13 ruling.

14 MS HOLLIS: I appreciate the ruling. I'm not contesting
10:40:16 15 the ruling. I'd like to put our position on the record, however.
16 Our position is this: That, for all practical purposes, this
17 witness is not a Prosecution witness. She has not availed
18 herself of contact with us. We didn't even know arrangements for
19 her arrival. And so, for those reasons, we believe that it is
10:40:36 20 not really a - excuse me, was there a comment from the other side
21 of the Bench?

22 PRESIDING JUDGE: Not that I heard. Please finish your
23 sentence.

24 MS HOLLIS: Thank you. That for that reason, this witness,
10:40:54 25 for all practical purposes, was not a Prosecution witness, and
26 that is simply what I would like to make the record on, Madam
27 President. Thank you.

28 PRESIDING JUDGE: Ms Hollis, if this witness is not a
29 Prosecution witness, whose witness is she?

1 MS HOLLIS: In our view, Madam President, if we were
2 actually characterising this as a witness, she was a witness who
3 was called to be more of a court witness because of her material
4 relationship with the events.

10:41:22 5 PRESIDING JUDGE: Well, Ms Hollis, I will publicly state
6 for the record that Ms Campbell is not a court witness, and that
7 she was subpoenaed by the Court at your request, as the
8 Prosecution, and the Court regards her as a Prosecution witness.

9 MS HOLLIS: And we accept that.

10:41:41 10 PRESIDING JUDGE: Before I release the witness, I will
11 inquire if the judges have questions for the witness.

12 JUDGE LUSSICK: Yes.

13 Ms Campbell, regarding the function at Nelson Mandela's
14 place, I think it would be correct to say that everybody present
10:42:06 15 was there by invitation?

16 THE WITNESS: Correct.

17 JUDGE LUSSICK: Right. And were there security guards
18 there to prevent non-invited people from getting into the dinner?

19 THE WITNESS: There were security guards all over the
10:42:22 20 grounds that I remember.

21 JUDGE LUSSICK: Now, on the question of the gift of
22 diamonds, you've told us that you just assumed that they came
23 from Charles Taylor?

24 THE WITNESS: Yes, because he didn't actually give it to me
10:42:39 25 himself, like you know, so --

26 JUDGE LUSSICK: No, I'm not actually asking that.

27 THE WITNESS: Yeah.

28 JUDGE LUSSICK: I'm just prefacing my question by saying
29 that you have told us that you only assumed that they came from

1 Charles Taylor.

2 THE WITNESS: Yes.

3 JUDGE LUSSICK: But have you considered that they may have
4 come from somebody else present at that dinner?

10:42:58 5 THE WITNESS: When we discussed it at breakfast, I think it
6 was Mia Farrow that said there's no one else at that table that
7 would give such a gift. So the assumption was made and I said,
8 "Okay, I guess it was".

9 JUDGE LUSSICK: All right. Thank you.

10:43:20 10 PRESIDING JUDGE: Ms Campbell, I have one or two questions
11 for you.

12 My first question stems from Judge Lussick's question. The
13 people we have seen depicted in the photograph, MFI-11, were
14 those the only guests at the dinner?

10:43:42 15 THE WITNESS: Yeah. There may be - there was one table,
16 there couldn't have been no more than maximum 14 people at that
17 dinner, and we were the guests, I guess the special guests, of
18 the Blue Train and Nelson Mandela Children's Fund.

19 PRESIDING JUDGE: Because Carole White is not depicted in
10:44:06 20 this photograph.

21 THE WITNESS: Because she wasn't a guest invited, like -
22 she came because of me, so she got to meet Mr Mandela, which many
23 people in the world want to meet until this day, because of me,
24 so I shared the opportunity with her in inviting her to come.
10:44:24 25 She wasn't forced to come on the trip. And she wasn't coming to
26 be a chaperone. She was coming because it was a trip of a once
27 of a lifetime that I probably would never do again.

28 PRESIDING JUDGE: So was she at this dinner?

29 THE WITNESS: She was, but I guess she didn't feel that she

1 wanted to be in the photo.

2 PRESIDING JUDGE: And where, in relation to you, was she
3 sitting at the table?

10:44:49

4 THE WITNESS: She was across from me. She sat across the
5 table.

6 PRESIDING JUDGE: And where in relation to Charles Taylor
7 was Carole White sitting?

8 THE WITNESS: Across also, because he was on the same side
9 as me.

10:45:04

10 PRESIDING JUDGE: Now, do you remember whether Mr Taylor
11 took the ride on the Blue Train with the rest of the crowd --

12 THE WITNESS: No, he didn't.

13 PRESIDING JUDGE: -- the next day?

10:45:15

14 THE WITNESS: I think you would know that in the press,
15 because there was a big press conference. He didn't get on the
16 train. I don't know if he was invited - I don't think he was
17 invited.

18 PRESIDING JUDGE: Those would be my only questions. And,
19 Ms Campbell, we want to thank you for your testimony.

10:45:32

20 THE WITNESS: Thank you very much.

21 PRESIDING JUDGE: And for taking time out of your busy
22 schedule, and we wish you a safe journey home.

23 THE WITNESS: Thank you very much. Thank you.

24 PRESIDING JUDGE: The witness may be escorted out, please.

10:46:06

25 In view of the time, I'm wondering the best way forward.

26 I was thinking that since the next Prosecution witness is due on
27 Monday we would, for the rest of this day, use this time to
28 continue Mr Sesay's testimony. Would that be feasible,
29 Mr Griffiths?

1 MR GRIFFITHS: Well, I don't know whether that's feasible
2 or not, Madam President, for this reason: I recall the
3 representatives of WVS telling me that they would have difficulty
4 moving the witness beyond a certain hour. And I don't know,
10:46:48 5 given the current time, whether it's still possible to get him
6 here for today. I think that is an inquiry which will have to be
7 addressed to those responsible.

8 PRESIDING JUDGE: Mr Townsend, could you address the Court
9 on the availability of the witness?

10:47:24 10 MR TOWNSEND: Yes, your Honour. As it's almost 11, I would
11 suggest we take the adjournment, at least now or soon before 11,
12 and I've been in touch with the Dutch Transport Police and
13 I understand that Mr Sesay could be here within an hour. So
14 I would suggest we come back at 12 and resume session at 12, and
10:47:45 15 I will inform everyone if that witness can't be produced at that
16 time.

17 MR GRIFFITHS: Madam President, can I indicate one further
18 practical difficulty? In light of what we were told yesterday by
19 the Court, I had assumed that Mr Sesay would not be back until
10:48:03 20 Tuesday and consequently, the material which I was using to
21 examine the witness is not with me at court.

22 PRESIDING JUDGE: But, Mr Griffiths, it was you, if
23 I recall, who reminded me that there is Friday as well.

24 MR GRIFFITHS: Yes, but if we look at the transcript for
10:48:19 25 yesterday, we were told that the witness would not be required
26 until Tuesday.

27 PRESIDING JUDGE: That was my first thinking until the
28 parties raised to my attention that this witness that has just
29 left the Court would be a very short witness and that there would

1 be time on Friday, and possibly the rest of today. And then
2 I said to Mr Sesay, "In any event, you will be called and
3 interposed as and when the time comes". I didn't say Mr Sesay
4 would be called back on Tuesday.

10:48:53 5 MR GRIFFITHS: Well, in any event, Madam President, I'm not
6 in a position to proceed with the witness today unless I'm given
7 time to go home, collect the papers, and come back.

8 PRESIDING JUDGE: And you do not think that you can do that
9 by 12 o'clock?

10:49:09 10 MR GRIFFITHS: No.

11 PRESIDING JUDGE: Okay. I'm going to consider adjourning
12 the proceedings to 2.30, but I've been reminded that there were
13 some MFIs that were marked that we need to decide what you want
14 to do with.

10:49:39 15 MR GRIFFITHS: Yes, there were two of them.

16 PRESIDING JUDGE: Three.

17 MR GRIFFITHS: That was MFI --

18 PRESIDING JUDGE: Three, actually.

19 MR GRIFFITHS: We marked the second MFI-12A and B. Could
10:50:00 20 I ask then that the first MFI-11, the photograph taken at the
21 event in South Africa in September 1997, be admitted into
22 evidence, please?

23 PRESIDING JUDGE: The said photograph is admitted as
24 exhibit D-424.

10:50:25 25 [Exhibit D-424 admitted]

26 MR GRIFFITHS: And MFI-12A, a news article emanating from
27 ABC News, that that too be admitted into evidence.

28 PRESIDING JUDGE: Ms Hollis, I do beg your pardon. Do you
29 object?

1 MS HOLLIS: No problem at all, Madam President, and we have
2 no objections to either of these MFIs, in fact none to of the
3 three.

10:50:57

4 PRESIDING JUDGE: Right. The ABC News article is admitted
5 as exhibit D-425A. The letter dated 4 August 2010 by the CEO of
6 the Nelson Mandela Children's Fund addressed to Mr Griffiths is
7 admitted as exhibit D-425B.

8 MR GRIFFITHS: I'm grateful.

9 [Exhibits D-425A and B admitted]

10:51:29

10 PRESIDING JUDGE: The Court is adjourned to 2.30 this
11 afternoon for continuation of the Defence case.

12 [Break taken at 10.52 a.m.]

13 [Upon resuming at 2.30 p.m.]

14:31:44

14 PRESIDING JUDGE: Good afternoon. I note a change of
15 appearances.

16 MR KOU MJIAN: Yes, your Honour, for the Prosecution this
17 afternoon: Brenda J Hollis, Maja Dimitrova, Nicholas Koumjian.

14:32:11

18 MR GRIFFITHS: For the Defence this afternoon: Myself
19 Courtenay Griffiths, with me, Mr Silas Chekera, Ms Logan
20 Hambri ck, Ms Kathryn Hovington, Mr Michael Herz and Mr Simon
21 Chapman.

22 PRESIDING JUDGE: Thank you. Mr Sesay, good afternoon. As
23 we continue with your evidence-in-chief, you are still bound by
24 your oath to tell the truth.

14:32:29

25 WITNESS: DCT-172 [On former oath]

26 EXAMINATION-IN-CHIEF BY MR GRIFFITHS: [Cont'd]

27 Q. Mr Sesay, when did you personally first meet Abu Keita?

28 A. I met with Abu Keita first in Koindu when Varmuyan Sherif
29 and him came to sell ammunitions to us in early '97.

1 PRESIDING JUDGE: Mr Interpreter, when who came?

2 THE INTERPRETER: Varmuyan Sherif.

3 MR GRIFFITHS: I understand there is a difficulty with the
4 defendant's LiveNote and he is unable to follow the proceedings.

14:33:36 5 MS IRURA: I will assist. Your Honours, we won't be able
6 to continue because even though the technician is assisting, he
7 is assisting to restore the broadcast screen but Mr Taylor has -
8 can view LiveNote presently while we continue. I have managed to
9 switch one of the screens to the transcript, so he can see the
14:36:20 10 transcript but the technician is logging into the computer that
11 normally provides LiveNote to Mr Taylor, so we can continue
12 because he can view LiveNote presently.

13 PRESIDING JUDGE: Very well.

14 MR GRIFFITHS: I am grateful.

14:36:39 15 Q. Now, you were saying, Mr Sesay, that the first time you saw
16 Abu Keita was in early 1997 when he arrived in Koindu with
17 Varmuyan Sherif; is that right?

18 A. Yes.

19 Q. And he came with ammunition; is that right?

14:37:10 20 A. Yes.

21 Q. And from where had that ammunition come?

22 A. They brought the ammunition from Voijnama, which was their
23 headquarters, the ULIMO headquarters at that time.

24 Q. Now, that's question number one. Question number two is
14:37:45 25 this: As far as you are aware, independently of yourself, when
26 was the first time Abu Keita came in contact with the RUF?

27 A. Well, first Abu Keita met with the RUF, that is Mike Lamin
28 and others, in late 1996 when they crossed into the Pujehun
29 District and they surrendered to ULIMO. From there he came and

1 met with Sam Bockarie in December 1996 in Foya.

2 JUDGE DOHERTY: Sorry, Mr Griffiths, "when they crossed
3 into the Pujehun District". Who crossed into the Pujehun
4 District? Mike Lamin? Because I recall a different journey.

14:38:53 5 MR GRIFFITHS:

6 Q. Well, explain for us, please, Mr Sesay, when did Abu Keita
7 first meet with the RUF?

8 A. Well, when the government troops used to attack RUF from
9 Zogoda to Pujehun and the RUF, at that time headed by Mike Lamin,
14:39:21 10 crossed the border to Liberia, we had to surrender to ULIMO.
11 That was the first time that Abu Keita met with the RUF, when
12 they were disarmed, the RUF.

13 Q. Now, as far as - no, before I get there. Until when would
14 you say Abu Keita continued to have a relationship with the RUF?

14:40:00 15 A. December 1996 when Sam Bockarie and other RUF men went to
16 Foya.

17 Q. And for how long did the relationship with Abu Keita
18 continue?

19 A. Well, it continued up to 1997, like up to May of '97, and,
14:40:32 20 after that, it resumed in December of '98. When he came he
21 brought about --

22 THE INTERPRETER: Your Honours, can the witness repeat this
23 part of his answer and can he kindly repeat slowly.

24 MR GRIFFITHS:

14:40:51 25 Q. Mr Sesay, the interpreter lost track of what you were
26 saying. So what you were saying was it continued up to 1997,
27 right up to May of '97, and, after that, it resumed in December
28 of '98 when something happened?

29 A. I said the relationship continued in 1998, December, when

1 Abu Keita brought 20 to 25 of his Mandingo people and he came and
2 told Sam Bockarie that he was afraid, he had fear for his life,
3 and so that was why he had come to Sam Bockarie for safety, to
4 the RUF.

14:41:45 5 Q. And having come to the RUF for safety, for how long did he
6 remain with the RUF?

7 A. He remained with the RUF until 2001, after the disarmament
8 of Kono and he came to Makeni and went to Freetown. Then I made
9 to understand that he went to Guinea.

14:42:16 10 Q. And did you see him after that?

11 A. No. After that I did not see him.

12 Q. Mr Sesay, have you heard of an event called the Camp
13 Johnson Road incident in Monrovia?

14 A. No. I'm not familiar with that.

14:42:42 15 Q. Prior to Abu Keita coming to RUF-held territory in December
16 1998 with 20 or so men, had he been engaged in any hostilities in
17 Monrovia, to your knowledge?

18 A. Well, he did not explain that area to me. What I
19 understood from him was that he was under threat from the
14:43:14 20 Liberian securities. That's why he went to Sam Bockarie and his
21 men for rescue. That was why he went there to stay with Sam
22 Bockarie.

23 Q. And the final preliminary matter I want your assistance
24 with before we look at some transcripts, is this: Was Abu Keita
14:43:36 25 ever a member of the RUF?

26 A. Well, when he came in December of '98 he stayed with the
27 RUF up to 2001.

28 Q. But by the fact of him staying, did that make him a member
29 of the RUF?

1 A. No. He did not command respect like we did, we the
2 commanders did, in the rank and file. He was not recognised as a
3 commander of the RUF, even within the RUF, no.

14:44:38 4 JUDGE LUSSICK: Is the witness saying that Abu Keita was
5 not a member of the RUF or just wasn't a commander of the RUF?

6 MR GRIFFITHS: Well, I will ask the witness directly,
7 your Honour.

8 Q. What is it, Mr Sesay? Was he a member of the RUF? Let's
9 start with that.

14:44:59 10 A. He was not a member of the RUF.

11 Q. Was he a commander in the RUF?

12 A. No, he was just a guest to the RUF.

13 Q. Whilst living within RUF territory as of December 1998 did
14 Abu Keita become involved in any military operations alongside
14:45:29 15 the RUF?

16 A. No. He did not take up any command responsibility within
17 the RUF.

18 MR KOUMJIAN: May I just point out that the witness did not
19 at all answer the question.

14:46:05 20 PRESIDING JUDGE: I don't know if something was lost in
21 translation, but, Mr Sesay, the question simply put was: Whilst
22 Abu Keita was living in the RUF-controlled testimony [sic] as of
23 December 1998, did he become involved in any military operations
24 alongside the RUF? Your answer was, "He did not take up any
14:46:37 25 command responsibility within the RUF", but that's not the
26 question you were asked. The question was: Did he become
27 involved in military operations alongside the RUF? Now please
28 answer that question.

29 THE WITNESS: Yes, my Lord, because in January of '99 he

1 was with Mike Lamin when they were in Segbwema. And from there
2 he was not involved in any fighting with the RUF up until the
3 disarmament.

4 PRESIDING JUDGE: What was he doing in Segbwema?

14:47:21 5 THE WITNESS: He was with Mike Lamin. Mike Lamin
6 supervised the operation that was going on in Segbwema, but I did
7 not hear that he went to the battlefield to fight, but he was
8 there with Mike Lamin.

9 PRESIDING JUDGE: Was he just keeping him company? What
14:47:43 10 was he doing there? The question was: Was he involved in
11 military activities, military operations?

12 THE WITNESS: He did not go to the battlefield to fight.
13 He was with Mike Lamin in Segbwema. That is what I knew.

14 PRESIDING JUDGE: Doing what with Mike Lamin?

14:48:09 15 THE WITNESS: Mike Lamin was the one who supervised the
16 operation in Segbwema, so he said the two of them came from Buedu
17 and they went to Segbwema, so he accompanied Mike Lamin. But he
18 was not the commander. It was Mike who was the commander.

19 MR GRIFFITHS:

14:48:27 20 Q. Now, Mr Sesay, did the men, the 20 or so men who came with
21 Abu Keita, did they fight alongside the RUF?

22 A. Yes, some of them fought.

23 Q. When and where?

24 A. Like when Abu Keita went to Segbwema with Mike Lamin,
14:49:01 25 Colonel Leo and others were at the battlefield with the RUF.

26 Q. Now, having dealt with those preliminary matters, I would
27 like to direct your attention now to some transcript.

28 Transcript, open session, 23 January 2008, page 1962, line 3:

29 "Q. Now sometime after you were recalled to the AFL,

1 Armed Forces of Liberia, did fighting break out in
2 Monrovia?

3 A. Yes.

4 Q. Can you briefly explain what that was about?

14:50:14 5 A. Fighting broke out on Camp Johnson Road because
6 Roosevelt Johnson was appointed as minister of - as a
7 minister in Taylor's government and then he went on sick
8 leave - when he went on sick leave - when he came back he
9 was at Camp Johnson Road and then he saw Joe Wally who was
14:50:37 10 a former bodyguard to the late Samuel Doe, so he was at
11 Roosevelt Johnson's house and then they ordered that he was
12 to be arrested.

13 Q. In the fighting related to the return of Roosevelt
14 Johnson, who was fighting on each side?

14:51:00 15 A. Well, it was the SSU and the SSS.

16 Q. Okay. You have to explain to everyone here what those
17 refer to."

18 And he goes on to explain what that means, which need not
19 detain us. And picking it up from line 25:

14:51:20 20 "And their mission was to arrest Roosevelt Johnson and then
21 Roosevelt Johnson escaped the arrest and went to the American
22 embassy. That caused a lot of shootouts. Then from there I was
23 also arrested by one bodyguard of the SSU."

24 Line 13.

14:51:47 25 "Q. Who were the forces? You mentioned the SSU and the
26 SSS who were part of Charles Taylor's forces. Who were
27 they fighting against in that battle in Monrovia?

28 A. They were fighting against Roosevelt Johnson to arrest
29 him."

1 Now pausing there, the name Roosevelt Johnson, and this is
2 relevant to matters I'm going to deal with in a moment, is that a
3 name familiar to you, Mr Sesay?

4 A. Yes.

14:52:21 5 Q. Who was Roosevelt Johnson?

6 A. He was the leader of the ULIMO-J.

7 Q. And you have mentioned earlier that Abu Keita was ULIMO, to
8 which faction of ULIMO did Abu Keita belong?

9 A. He belonged to the ULIMO-K, the ULIMO-Kromah.

14:52:53 10 Q. Line 22:

11 "Q. Now at any time prior to your arrest or in the few
12 weeks prior to your arrest had you met with Roosevelt
13 Johnson?

14 A. Yes, I met with Roosevelt Johnson.

14:53:10 15 Q. Can you explain what happened at that meeting?

16 A. Roosevelt Johnson called both parties, the former
17 ULIMO-J and those who were members of the former ULIMO-K.
18 He said we should have a ceremony together because we
19 fought against each other, we killed each other, and he
14:53:33 20 said the war was over so he said we should be one. That
21 was the meeting I had with him.

22 Q. Was this before the fighting or during the fighting?

23 A. It took place before the fighting. That was why I was
24 arrested, because they said they saw me there.

14:53:51 25 Q. You said you were taken to Saw Beach Prison" - and he
26 explains where Saw Beach Prison is. Line 17:

27 "I was taken to Saw Beach Prison. I was there for one week
28 when - and I was not charged to go to court, I was just in
29 detention there. And later I was freed by one SS director for

1 operations who was Varmuyan Sherif."

2 Now Varmuyan Sherif of course you knew, didn't you,
3 Mr Sesay?

14:54:40

4 A. Yes, I know that he was a member of the ULIMO-K before the
5 government in Liberia - before the elections in Liberia in '97.

6 Q. Now were you aware that Abu Keita had been implicated in
7 this incident, Camp Johnson Road, which had resulted in him being
8 arrested and detained?

14:55:06

9 MR KOUMJIAN: Objection. That misstates the evidence that
10 was read.

11 PRESIDING JUDGE: Mr Griffiths?

12 MR GRIFFITHS: I'm sure it's my fault but I really don't
13 understand the objection.

14:55:24

14 MR KOUMJIAN: I would be happy to explain if it's
15 necessary.

16 MR GRIFFITHS: Yes, please.

14:55:40

17 MR KOUMJIAN: Mr Abu Keita testified he took no part in the
18 Camp Johnson Road fighting. He indicated he was arrested by
19 Charles Taylor's securities because they had seen him at a
20 meeting with Roosevelt Johnson a week before the fighting but he
21 had taken no part in the fighting. He was a member at that time
22 of the AFL, if I recall, based at the barracks in Monrovia.

23 PRESIDING JUDGE: Mr Griffiths, do you - would you like to
24 rephrase your question in light of that observation?

14:56:17

25 MR GRIFFITHS: Actually, no, I don't. The question is
26 quite simple; had been implicated, because he was present at the
27 meeting. It doesn't mean that he was individually involved in
28 the fighting. It is a fairly straightforward question.

29 PRESIDING JUDGE: But you said implicated in the incident.

1 MR GRIFFITHS: Yes, Camp Johnson Road, because he had been
2 seen at this meeting which preceded the incident.

3 PRESIDING JUDGE: Let's not argue about this. Try and
4 rephrase your question, Mr Griffiths, to reflect the accuracy.
14:56:52 5 Being implicated in the incident is ambiguous.

6 MR GRIFFITHS:

7 Q. Mr Sesay, were you aware prior to Abu Keita arriving in
8 Buedu in December 1998 that he had been arrested following a
9 violent incident in Monrovia at Camp Johnson Road?

14:57:24 10 A. No. At that time I did not know because he did not explain
11 that to me. What I heard from him was that his life was being
12 threatened in Liberia, that was why he had come to Sam Bockarie.

13 Q. Right. Had he told you that he had been put in detention,
14 in prison in Monrovia following some violent incident? Did he
14:57:55 15 tell you that?

16 A. No, he did not tell me that.

17 Q. Now, I ask you all of that, Mr Sesay, for this reason, and
18 I am hoping to save time here, so I hope there will be no
19 objection: In due course, over the course of pages 1966, for the
14:58:21 20 assistance of others, and 1967 of the transcript of 23 January
21 2008, he explains that he was taken from detention to a meeting.
22 And let's pick it up now at page 1968, please, line 18:

23 "Q. So you said about a week after the first meeting at
24 Musa Cisse's house they came and picked you up, and tell us
14:58:59 25 what happened then.

26 A. Yes. We went down to Benjamin Yeaten's house. Then
27 there was a meeting there where I saw Sam Bockarie of the
28 RUF, I saw Eddie Kanneh. Then I saw the War Council leader
29 of the RUF, SB Rogers, and the adjutant of the RUF, who was

1 Rashid, and Benjamin Yeaten himself and then he" - that is
2 Benjamin Yeaten - "asked me to join the RUF in Sierra
3 Leone. Then I said 'no problem, sir' I said 'as long as
4 that was an instruction from you', I said 'I would
14:59:57 5 implement it, sir.' So I asked him to allow me to prepare
6 myself and then he accepted."
7 Next page:
8 "Q. Sir, was there anyone else present at the meeting that
9 you can recall?
15:00:18 10 A. Yes. There was Montgomery and Varmuyan Sherif himself
11 came and met us at the meeting."
12 Line 15:
13 "Q. After you agreed to join the RUF what happened then?"
14 A. Then I said I should prepare myself and then we were
15:00:40 15 driven from Benjamin Yeaten's house. That was the time I
16 saw a satellite phone with Sam Bockarie and he said it was
17 given to him by Benjamin Yeaten."
18 Line 28:
19 "Q. You said that he said you should go fight with the
15:01:07 20 RUF. Did he explain why he was asking you to do that or
21 where he got the idea?
22 A. I don't have any idea other than the one he told me;
23 that I should join the brothers."
24 Line 13:
15:01:28 25 "Q. Did Benjamin Yeaten explain anything else to you when
26 he said you should go join the RUF?
27 A. He says he wants a stand-by force to be in Sierra Leone
28 so then I should be the commander of that troop, to be
29 based in Sierra Leone.

1 Q. Did he indicate whether you would be in command? You
2 said the commander of that troop. What did he say about
3 the troop that you're talking about?

4 A. He said I was going to be the commander of a troop that
15:02:10 5 was going to be in Sierra Leone with Sam Bockarie.

6 Q. Do you recall if he gave a name for that unit, the
7 troops?

8 A. He said the troop would be called the Scorpion unit and
9 that I would be the commander to be based with Sam Bockarie
15:02:35 10 in Sierra Leone."

11 Now, do you know anything about any of that, Mr Sesay?

12 A. No. I did not hear that.

13 Q. Did Abu Keita ever tell you that he had been sent to be a
14 commander in Sierra Leone by Benjamin Yeaten, Fifty?

15:03:10 15 A. No, he never told me that.

16 Q. Did Abu Keita ever tell you that he had been sent to
17 command a unit called the Scorpion unit?

18 A. No, he did not tell me that and we did not have any
19 Scorpion unit in the RUF. We did not have such a name. No such
15:03:39 20 unit functioned within the RUF.

21 Q. Was there, for example, a group of Liberians brought to
22 Sierra Leone by Abu Keita who had the name Scorpion unit?

23 A. No. The 20 to 25 men that he brought with him, they were
24 all Mandingos from his own tribe and none of them came with guns,
15:04:12 25 so they were not in the uniform.

26 PRESIDING JUDGE: If I may inquire, these 20 to 25 men that
27 Abu Keita came with, was he their commander?

28 THE WITNESS: Yes, but they were all his tribesmen. He was
29 the head for them.

1 PRESIDING JUDGE: Yes, them being his tribesmen, does that
2 have any significance?

3 THE WITNESS: Yes, ma'am, because the ULIMO-K was
4 predominantly Mandingo people. That was what I knew. And even
15:05:07 5 the problem that they had with ULIMO-J emanated from some of
6 those things.

7 PRESIDING JUDGE: So he was their commander. Did they have
8 a name?

9 THE WITNESS: No, ma'am, they did not have any name.

15:05:29 10 MR GRIFFITHS:

11 Q. When they arrived in Sierra Leone, that group, did they say
12 that they had been sent by anyone to be in Sierra Leone?

13 A. No, they did not say that.

14 Q. Now, Mr Sesay, do you confidently state that there was no
15:05:54 15 such thing as a Scorpion unit headed by Abu Keita?

16 A. No. At the time they came I never heard such a name. To
17 say that the men who came were with Abu Keita belonged to a
18 Scorpion unit, I have only heard that name in this courtroom.
19 And within the RUF there was no unit that was referred to as the
15:06:22 20 Scorpion unit, no.

21 MR GRIFFITHS: Could the witness please be shown exhibit
22 P-28.

23 Q. Now, Mr Sesay, this is a document I have shown you before,
24 but in light of your answer, I want you to deal with an aspect of
15:07:01 25 this exhibit. Look at the number 4 on the left of the page:

26 "Revolutionary brothers behind enemy line forces, name,
27 Scorpion unit is here commanded by Major General Keita."

28 Now, when we go to the bottom of the page, and we have
29 looked at this before, the very bottom of the page, please,

1 "General Issa Sesay." So help us: Was there a Scorpion unit
2 commanded by Abu Keita or not?

3 A. No. There was no Scorpion unit within the RUF. And I
4 never heard that Abu Keita commanded a unit called the Scorpion
15:08:08 5 unit. This is my first time hearing this, and even for this
6 document, this is my first time seeing it.

7 PRESIDING JUDGE: What? You have seen exhibit P-28 before.
8 Mr Sesay, are you saying that today is the first time that you
9 are looking at this document?

15:08:34 10 THE WITNESS: My Lord, I am talking about the courtroom. I
11 am saying that it is in this courtroom, that is the first time my
12 seeing it within this courtroom.

13 MR GRIFFITHS:

14 Q. Let's go back - let's put that away, please, and let's go
15:08:51 15 back to page 1970, line 24:

16 "A. He said the troop would be called the Scorpion unit
17 and that I would be the commander to be based with Sam
18 Bockarie in Sierra Leone.

19 Q. Did he indicate to you what plan he had for those
15:09:18 20 troops, whether there were any operations planned?

21 A. He did not give me any details of the operation plan,
22 sir.

23 Q. Was there any mention of any areas in Sierra Leone?
24 Did he indicate any particular area of Sierra Leone, such
15:09:37 25 as, well, Port Loko?

26 A. He said we would - should be based in Buedu, Buedu in
27 Kailahun District."

28 Pause there. Mr Sesay, just to deal with a detail I
29 overlooked, can we go back to page 1968 please, line 21, in

1 describing this meeting at which he was given this assignment by
2 Benjamin Yeaten shortly after having been released from prison,
3 Abu Keita told these judges that he saw Sam Bockarie at the
4 meeting, along with other senior members of the RUF and also
15:10:41 5 Eddie Kanneh.

6 Help us. Do you recall Sam Bockarie talking to you about
7 having attended a meeting in Monrovia at which Abu Keita and
8 Varmuyan Sheriff were present.

9 A. No. Sam Bockarie did not tell me that.

15:11:17 10 Q. Page 1971, line 15:

11 "Q. Sir, did he indicate any attacks were planned?

12 A. No. He said I should be based in Sierra Leone with Sam
13 Bockarie."

14 Line 20:

15:11:36 15 "He said he had planned with the boss, who is Charles
16 Taylor, who had given him the instruction to send me to Sierra
17 Leone."

18 And then he goes on to describe various individuals. Now,
19 let's pick up the account at page 1979 please, line 16:

15:12:26 20 "Q. And after you went back to your house, did you get
21 called back again?

22 A. Yes.

23 Q. Tell us what happened next.

24 A. Marzah, Sampson, Jungle, they came with the pick-up, a
15:12:39 25 Toyota Land Cruiser pick-up, a green one. They said Chief
26 Benjamin Yeaten said I should go. When I went, he said I
27 should prepare to go to Sierra Leone. Then I said, 'No
28 problem.' Then I went and told my wife that I would be
29 leaving to go to Sierra Leone. Then I was issued with one

1 AK-47 and one silent weapon pistol which contained eight
2 rounds. It contained eight rounds. I was issued with 10
3 boxes of ammunition to move to Sierra Leone.

15:13:16

4 Q. Sir, where did you get the pistol, the AK-47, and these
5 boxes of ammunition?

6 A. They were issued to me by Chief Benjamin Yeaten, the SS
7 director, at his house.

8 Q. Did he give you anything else besides the weapons and
9 ammunition?

15:13:28

10 A. And one Yaesu radio for communication and three
11 bodyguards. They were all issued rifles."

12 And then he goes on to describe what a Yaesu radio is.

13 Line 15:

15:13:49

14 "Q. Now you also mentioned boxes of ammunition. When you
15 say a box of ammunition, can you describe what you mean?"

16 He then goes on to describe the wooden box and the sardine
17 tins inside, and that continues over the page.

18 Page 1982, line 8:

19 "A. I was given three bodyguards.

15:14:05

20 Q. Were these people that you knew before?

21 A. No, sir. They were Liberians.

22 Q. Do you know if they belonged to any fighting faction or
23 army?

24 A. They belong to the former NPFL."

15:14:23

25 Line 18:

26 "A. I was given escort by Marzah, Sampson and Jungle, and
27 one bodyguard of Musa Cisse, and one other driver who was
28 called Yellowman and the three bodyguards. We started
29 moving towards Lofa County. When we got there, we got to

1 Voinjama. We met the police commander in charge of
2 Lofa County who was called Colonel Toma, and then he
3 informed us that Sam Bockarie is on his way coming, so we
4 should stay. We were to remain in Voinjama in his house,
15:14:51 5 and then we waited there and Sam Bockarie came. Then
6 Marzah, Sampson and Jungle, the car that we drove on, Sam
7 Bockarie and SB Rogers, Eddie Kanneh and his bodyguard,
8 Foday and Rashid, they used that vehicle. The vehicle that
9 Sam Bockarie drove on - Sam Bockarie - and they later
15:15:13 10 called him on the Yaesu area from the RUF-controlled area
11 that Issa Sesay should come and meet me at Foya."

12 Now, the sequence is this, Mr Sesay, just so you understand
13 what was being said by Abu Keita: Having been given that
14 assignment by Benjamin Yeaten, he then leaves Monrovia armed and
15:15:49 15 escorted by, amongst others, Marzah, Sampson and Jungle; they go
16 to Voinjama where you meet them and escort them to Buedu. Did
17 that happen?

18 A. No. I did not go and meet Sam Bockarie in Foya. No, that
19 did not happen.

15:16:18 20 Q. Did you go and meet Abu Keita at Voinjama along with other
21 armed men?

22 A. No, no, never. It did not happen.

23 Q. Now, you had said earlier, Mr Sesay, unprompted by any
24 question from me, that when Abu Keita arrived in December 1998,
15:16:43 25 they did not carry guns. Do you remember that?

26 A. I recall. None of them brought guns with them and Abu
27 Keita himself did not have a pistol.

28 MR KOU MJIAN: I am sorry, I just do not recall that, and I
29 would appreciate a reference, if we have one.

1 PRESIDING JUDGE: He did. I recall it. I can't tell you,
2 but he did say that they weren't carrying guns.

3 MR GRIFFITHS: I am grateful.

15:17:16

4 THE WITNESS: My Lord, please, I would want them to give me
5 two minutes so that I use the restroom.

6 PRESIDING JUDGE: Very well. You may be escorted out,
7 please.

8 [In the absence of the witness]

15:17:24

9 MR GRIFFITHS: That will give me an opportunity of finding
10 the reference so that I can enlighten Mr Koumjian.

11 MR KOUMJIAN: If that was today, I can find it easily. I
12 didn't know if that was today or another day.

13 PRESIDING JUDGE: It was today.

15:18:33

14 MR KOUMJIAN: I found it on line 88 at the bottom of my
15 LiveNote, first line of page 89.

16 PRESIDING JUDGE: That's the thing that he just said.

17 MR KOUMJIAN: My colleagues tell me page 83.

18 PRESIDING JUDGE: It is page 83, line 12, 13, 14.

15:19:29

19 MR GRIFFITHS: Madam President, it appears that we might
20 have a slightly longer hiatus than we planned because the
21 defendant would also like to take advantage of the facilities
22 once Mr Sesay returns.

23 PRESIDING JUDGE: Very well.

24 [In the presence of the witness]

15:20:33

25 PRESIDING JUDGE: Mr Taylor may be escorted out, please.

26 Right, Mr Griffiths, please continue.

27 MR GRIFFITHS: Yes.

28 Q. Mr Sesay, so we get then to page 1985 and we are
29 describing, through the testimony of this witness, his arrival in

1 Sierra Leone. Page 1985, please, line 3:

2 "Q. After you went to Foya, then where did you go?

3 A. When I got to Foya, I met Issa Sesay in Foya. He said,
4 'Abu Keita, you have delayed. I have been waiting for you
15:23:15 5 all day.' Then I said to him, 'But the road is bad.'"

6 Line 16:

7 "Q. So Issa Sesay was waiting for you there in Foya?

8 A. In Foya, yes.

9 Q. And where did you go after meeting Issa Sesay?

15:23:34 10 A. When I met with Issa Sesay, we moved to Buedu. We
11 drove from Foya to Buedu."

12 Over the page, line 25:

13 "A. When we got to Buedu, the RUF soldiers, Issa Sesay
14 instructed them, the military commander called Kaisuku, to
15:23:57 15 make an apartment available to me very close to him and Sam
16 Bockarie."

17 Page 1987 please, line 18:

18 "Q. When you got to Buedu, you've described it a bit, was
19 there any construction going on?"

15:24:19 20 Line 22:

21 "Issa Sesay took me to a site where they were building an
22 airstrip that there was a Caterpillar and manpower to dig the
23 hill to level the ground. The length was about 3 miles and that
24 they said they were expecting planes to come down there to bring
15:24:38 25 supplies. And whilst they were building, a jet bombarded the
26 Caterpillar at the airstrip. So we used to work in the evening
27 on the airstrip."

28 Now, first of all, when Abu Keita arrived in Buedu were you
29 the person that went to fetch him from Foya, Mr Sesay?

1 A. Not at all. Not me.

2 Q. When Abu Keita arrived in Buedu, and you have already told
3 us you recall him returning in or about December of 1998, did
4 anyone escort him into RUF territory?

15:25:29 5 A. No.

6 Q. In December of 1998 at the time Abu Keita arrived in Buedu,
7 where were you living?

8 A. I was living in the house that you brought before the Court
9 that day, the house that was opposite Sam Bockarie's house. That
10 was where I was living.

11 Q. Thank you. And did you instruct someone to provide or make
12 available an apartment for Abu Keita?

13 A. No, I did not do that.

14 Q. Who is Kaisuku?

15:26:23 15 A. Kaisuku was the MP commander. He was the overall MP
16 commander in the RUF.

17 Q. Was Kaisuku based in Buedu at this time?

18 A. Yes, Kaisuku was in Buedu.

19 Q. And at or about this time in December 1998, is it correct
15:26:50 20 to say that the RUF were engaged on building an airstrip at or
21 near Buedu?

22 A. Yes, RUF was building the airstrip for a long time before
23 December '98.

24 Q. And is it correct to say that following Abu Keita's arrival
15:27:17 25 a jet bombarded the Caterpillar at the airstrip?

26 A. The jet bombed the Caterpillar in November of 1998. That
27 was when the jet bombarded the Caterpillar.

28 Q. Now I need to jump forward, Mr Sesay, in order to come back
29 so that we can put the testimony of this witness in some context.

1 PRESIDING JUDGE: Mr Griffiths, this may not be important,
2 but I will ask anyway. You asked if Abu Keita arrived before or
3 after the Caterpillar was bombarded and, Mr Sesay, was that
4 before or after Keita's arrival, the bombardment.

15:28:12 5 THE WITNESS: My Lord, it was before the jet bombarded the
6 Caterpillar that Keita and others came to Buedu.

7 MR GRIFFITHS:

8 Q. So was Keita in Buedu at the time of the bombardment?

9 A. No, he had not yet come to Buedu.

15:28:35 10 Q. Okay, so the Caterpillar was bombarded before he arrived?

11 A. Yes. It was not a Caterpillar, but a grader.

12 Q. Now, at page 2133, transcript of 24 January 2008, this
13 proposition was put to the witness from which he did not dissent,
14 line 22:

15:29:18 15 "And now the time frame I am referring to is the entire
16 period of time you were in Buedu, which you told us was September
17 1998 - well, in Sierra Leone, September 1998 through the end of
18 2002."

19 So what Mr Abu Keita was telling the judges was he arrives
15:29:46 20 in September 1998 and he remains until the end of 2002. Is that
21 correct, Mr Sesay?

22 A. No, that's a lie. It's a lie.

23 Q. And also I'll provide you with this synopsis before we go
24 to look at some of this in detail. At page 2138, testimony of 24
15:30:21 25 January 2008, the witness was asked this question:

26 "Q. Can you tell us the different places where you fought
27 while you were in Sierra Leone?

28 A. Yes.

29 Q. Please go ahead.

1 A. I told you the first operation was Mosquito Spray into
2 Liberia. The LURD rebels crossed from Guinea and attacked
3 Voinjama, Kolahun in Lofa County, and then we were called
4 from Buedu. Sam Bockarie, Issa Sesay, Morris Kallon,
15:30:58 5 including myself, we moved to Foya. There we met the other
6 commander, the AFL commander who was in Foya called Colonel
7 Stanley. He was the commander in charge of Foya. And we
8 met Christopher Varmoh, who was the commander in charge in
9 Varmoh called Skinny. Benjamin Yeaten, he and Sam Bockarie
15:31:25 10 were coordinating while we were on the front lines. When
11 we took over Kolahun, we took over Voinjama, Sam Bockarie,
12 Benjamin Yeaten and the defence minister, Daniel Chea - a
13 helicopter arrived in which Daniel Chea was and then Sam
14 Bockarie and Benjamin Yeaten and the defence minister, they
15:31:49 15 used the helicopter to go to Monrovia. That was the first
16 operation. The second --" and he is asked:
17 "Q. What year did that operation take place?
18 A. That was 1999.
19 Q. What month?
15:32:06 20 A. It was in August.
21 Q. And there was a second operation, you said?
22 A. Yes.
23 Q. When did that take place?
24 A. 2000.
15:32:19 25 Q. And in which country was that operation?
26 A. In Guinea.
27 Q. Well I would like to know, if you please, whether you
28 fought in Sierra Leone between 1998 and 2002?
29 A. Yes.

1 Q. And where did that fighting take place.

2 A. Bunumbu, Segbwema, Jumo Kafebu, Gbava, into Kolahun
3 and Kenema Districts."

4 So let's put that together and, as I say, we will come to
15:32:57 5 the detail in a moment. Between December 1998 when he arrives
6 until the end of 2002, according to Abu Keita he is involved with
7 you, Issa Sesay, in fighting against Mosquito Spray in
8 Lofa County. That's in 1999, August. Then in 2000 he is
9 fighting in Guinea and, whilst in Sierra Leone, thirdly, he is
15:33:30 10 involved in fighting between 1998 and 2002 in Bunumbu, Segbwema,
11 Jumo Kafebu, Gbava, into Kolahun and Kenema District. Do you
12 recall any of that, Mr Sesay?

13 A. Me - for me the things that you've spoken about, they did
14 not happen because I did not fight with - against the LURD rebels
15:34:04 15 with him in Liberia and, for example, now you are mentioning
16 Morris Kallon's name, I was with Morris Kallon in Makeni from
17 January to March.

18 Q. Of which year?

19 A. During the infighting - of 1999. And we withdrew to
15:34:20 20 Magburaka and I left Morris Kallon in Magburaka. He stayed there
21 from March to October 1999 and I rejoined him when we came back
22 to Makeni. So Keita and I did not go to fight against the LURD
23 in Liberia in '99. That never happened. Because in August I was
24 in Buedu. It was in August that I went to accompany Johnny Paul
15:34:44 25 Koroma in Foya when he went to Monrovia. I was in Buedu. I
26 never went across the border with Keita to fight and he himself
27 did not go across the border in August 1999 to fight against the
28 LURD rebels. That is not true.

29 Q. How do you know he did not go across the border to fight in

1 August 1999 against the LURD rebels?

2 A. Because the two of us used to keep company in Buedu. He
3 was staying at the same house with Lawrence Womandia. It was a
4 short distance from my house, very short. So in the morning he
15:35:22 5 will come to my house and we will have breakfast together, yes.
6 We will play drafts together. So I knew he never went to Liberia
7 to fight against the LURD rebels.

8 And the areas where he said he fought in Jumo Kafebu and
9 other area, Jumo Kafebu, the RUF had controlled there in '98,
15:35:54 10 some part of '98, late '98. And the time he and Mike Lamin went
11 to Bunumbu, Segbwema, that was in '99, around January '99. And
12 when Sam Bockarie called for Mike Lamin to go to Lome in May it
13 was when Abu Keita came to Buedu and he stayed there when Mike
14 Lamin headed the delegation for Lome.

15:36:27 15 Q. Now he is asked this, page 1988, another topic:

16 "Q. How long between the time you arrived in Buedu and you
17 saw Sam Bockarie again?

18 A. It took a couple of weeks before Sam Bockarie returned.
19 It was Marzah and Sampson and Jungle, they came first.

15:36:52 20 They brought fuel and medicines to Issa Sesay and a few
21 boxes of ammunition and then they went back

22 Q. Do you recall sometime after Abu Keita's arrival
23 receiving such items from Marzah, Sampson and Jungle?"

24 That's you, Issa Sesay, receiving those items from them.

15:37:23 25 A. No. That did not happen. Abu Keita did not come to Buedu
26 in September. It was December 1998 that Abu Keita came to Buedu.
27 When Sam Bockarie came from his trip, it was the following day
28 that Abu Keita arrived in Buedu with the men that I had spoken
29 about; those brothers of his. It was in December '98 that Abu

1 Keita came to Buedu and I left him in Buedu when I went to Kono.
2 But in September, October, Abu Keita was not in Buedu, not even
3 in November.

4 Q. You say when Sam Bockarie came from his trip. Which trip?

15:38:06

5 A. When he went to Burkina Faso and to Libya and he returned
6 in December '98. I said it was the following day that Abu Keita
7 and his brothers came.

8 Q. Page 1993 please. We are still on this same theme.

9 Question, line 7:

15:38:40

10 "Q. Do you remember the next time you saw - the first time
11 you saw Sam Bockarie, after you had gone to Buedu?

12 A. Yes.

13 Q. Where did you see him?

14 A. I saw him in Foya.

15:38:51

15 Q. First of all, how long after you arrived in Buedu
16 approximately was it before Sam Bockarie came back?

17 A. I told you it took a couple of weeks.

18 Q. How did you know to go to Foya? Why did you go to
19 Foya?

15:39:06

20 A. Because Issa Sesay said Sam Bockarie was coming. He
21 had received a radio call that we were to go to a meeting.

22 Q. Was that you would go to meet him?

23 A. Yes, I and Issa drove.

24 Q. When you saw Sam Bockarie did you see, was he with any
25 vehicle or vehicles?

15:39:30

26 A. Yes. He came with two trucks, one pick up with
27 ammunition and man power.

28 Q. Can you describe the trucks that you saw Sam Bockarie
29 with on this occasion?

1 A. It was the six tyre truck which the Libyan
2 Government gave to Charles Taylor.

3 Q. Do you recall the colour of the trucks?"
4 Over the page, line 4: "Beige".

15:40:05 5 Line 7:

6 "Q. Were you able to find out or estimate how much
7 ammunition Sam Bockarie brought on that occasion?

8 A. He brought 300 boxes of ammunition. That was the first
9 time he said he had a huge quantity."

15:40:26 10 And just so that we know when this was, if we go to page
11 1997 we see - yes, line 11:

12 "Q. Just so we are clear, this is a conversation when Sam
13 Bockarie told you about going to Burkina Faso, he told you
14 after coming back to Buedu with the 300 boxes of

15:41:24 15 ammunition; is that right?

16 A. Yes.

17 Q. So we know then the timing of this 300 boxes of
18 ammunition."

19 So let's go back to page 1994. Line 20:

15:41:49 20 "Q. Did the ammunition - did the trucks continue across
21 the border, or how was the ammunition taken to Sierra
22 Leone?

23 A. The trucks went as far as Buedu.

24 Q. You mentioned manpower, can you explain that. You
15:42:20 25 mean when you said Sam Bockarie had with him manpower.

26 A. He came with men from Liberia. It was a mixture of
27 Liberians and Sierra Leoneans, about 150 men. I was
28 expecting that they were the men that Benjamin Yeaten was
29 talking about whom he said I was going to command. I was

1 expecting that those were the men but the men were later
2 taken to Bunumbu, the RUF training camp. The training
3 commander was Monica Pearson and one Colonel Morris. Those
4 were the training commanders at Bunumbu camp."

15:43:13 5 Further down the page, please:

6 "Q. Was anyone, any other individuals" - line 24 - "on the
7 convoy that you knew?

8 A. I would think about that, sir.

9 Q. Do you know where the convoy started from?

15:43:30 10 A. They said the men were taken from Camp Naama.

11 Q. What about the ammunition, do you know where the
12 ammunition came from?

13 A. They said the ammunition was from Monrovia."

14 Now, Mr Sesay, did you travel with Abu Keita into

15:43:49 15 Lofa County where you met two trucks loaded with 300 boxes of
16 ammunition?

17 A. No, that did not happen, not at all. I did not travel
18 together with Keita. In fact, he was not in Buedu - that he was
19 in Buedu and I travelled with him to receive Sam Bockarie, no.

15:44:17 20 Q. Mr Sesay, during your time with the RUF, do you recall any
21 period when the RUF received a consignment of 300 boxes of
22 ammunition?

23 A. No. The RUF never had a consignment that was up to 300
24 boxes, from 1991 right up to the end of the war, never did we
15:44:44 25 have a consignment like that.

26 Q. As far as you can recall, what was, roughly, the size of
27 the largest consignment of ammunition the RUF ever received?

28 A. I can recall, like that 1991 when Mr Sankoh brought the
29 reinforcement, that is with Antony Mekunagbe and Sam Tuah, the AK

1 rounds were up to 100 boxes. That was the largest supply RUF
2 ever had when they brought it to fight against ULIMO.

3 Q. Just so we can identify that date, how long after the start
4 of the invasion did that consignment of 100 boxes arrive in
15:45:48 5 Sierra Leone?

6 A. That was after six months. It was six months into the
7 invasion but, in fact, it was mixed with G3 rounds.

8 Q. So that was the largest consignment ever received by the
9 RUF; is that right?

15:46:13 10 A. Yes.

11 Q. And just so we are clear, Mr Sesay, was there ever a time
12 when the RUF either received or captured 300 boxes of ammunition?

13 A. Yes. RUF captured large ammunition in Kono but the AK
14 rounds were not up to 300. But if you put everything together,
15:46:39 15 because they were mixed set of ammunition, but if you mixed - put
16 them together they were over 300 boxes that we captured in Kono
17 but they were not only AK rounds, they were HMG rounds, G3
18 rounds, calibre rounds and AK rounds.

19 Q. Now, the second aspect of this account --

15:47:01 20 JUDGE DOHERTY: Sorry, Mr Griffiths, where did the detail
21 of the AK rounds come into this? I heard a general statement of
22 300 boxes of ammunition. Is the witness saying it was limited to
23 AK rounds ammunition?

24 MR GRIFFITHS: Well, let me ask the witness. My
15:47:18 25 understanding was that he was describing the quantity captured at
26 Kono and how that was made up of different rounds. But let me
27 ask the witness.

28 Q. Mr Sesay, you tell us that the RUF captured a large
29 quantity of ammunition in Kono, and you were going on to explain

1 how that quantity was made up. Can you explain to us again,
2 please, so that it is clear on the record.

3 A. Yes. You asked me if the RUF had ever received a quantity
4 of ammunition that was up to 300 boxes, and I said, yes, we
15:48:04 5 captured a large quantity of ammunition in Kono. It was up to
6 300 boxes but it was a mixed set of ammunitions.

7 Q. A mix of what?

8 A. AK rounds, G3 rounds, HMG, that is GMG rounds, calibre
9 rounds, BZT rounds and even 90 calibre rounds were mixed; but all
15:48:39 10 of them were at the ammo dump. It was up to 300 boxes that were
11 parked after at the ammo dump.

12 Q. Thank you. Now, the other thing that we are told about -
13 or these judges were told about with regard to this incident,
14 that there were 150 man power brought in this convoy led by Sam
15:49:14 15 Bockarie and that these men were later taken to Bunumbu to be
16 trained by Monica Pearson and Colonel Morris. Now you are
17 supposed to be present when this - when you meet this convoy in
18 Foya. So you tell us, Mr Sesay, these men who supposedly came
19 from Camp Naama, did you see them?

15:49:40 20 A. No. I did not see such people, no. And no other person
21 came from Liberia to the RUF-controlled area to join the RUF,
22 apart from Abu Keita and his men that he brought, those 20 to 25
23 men. And even the training base that he is talking about now
24 that they were sent to be trained, that is not true, because
15:50:09 25 immediately after the capture of Kono, that is around late
26 January to early February, Sam Bockarie moved the training base
27 to Bunumbu, from Bunumbu to Yengema, so there was no training
28 there. That is a lie.

29 MR KOUMJIAN: Excuse me. I thought I heard the witness say

1 something about Liberia that was not translated.

2 PRESIDING JUDGE: Where do you think he said anything about
3 Liberia?

4 MR KOU MJIAN: It was not translated - in the last answer,
15:50:50 5 we can just ask him, but I thought that something he said was not
6 translated about Liberia but --

7 MR GRIFFITHS:

8 Q. Mr Sesay, did you make mention of Liberia in your last
9 answer?

15:51:03 10 A. Yes, I said nobody came from Liberia to Kailahun in
11 December '98 when they were trained in Bunumbu. I said that is a
12 lie. That did not happen.

13 Q. Now a further detail, Mr Sesay. Do you recall Abu Keita
14 showing either you or any other senior commander a piece of paper
15:51:44 15 bearing Charles Taylor's signature assigning him to Sierra Leone?

16 A. No. From the time Abu Keita came in '98 until the time he
17 left in 2001, during disarmament, he never showed me such a
18 paper.

19 Q. And tell me, whilst living in Buedu, did Abu Keita have
15:52:20 20 access to RUF communication facilities?

21 A. No. I never witnessed him sending a radio message, never,
22 in Buedu. And even when the two of us came to Makeni in October
23 1999, I never saw him send a radio message anywhere.

24 Q. Did you hear of him, for example, communicating with
15:52:52 25 Benjamin Yeaten over the radio?

26 A. No. That never happened. It did not happen in Buedu,
27 while he was there and even the time that the two of us were
28 there in '99, and even when the two of us went to Makeni in late
29 '99, that did not happen, never.

1 Q. Very well. Let me just assist you with some testimony.

2 Page 1999, testimony of 23 January 2008. Line 8:

3 "Q. When you were in Monrovia where did you see him, at
4 what place or house?

15:53:51 5 A. I saw him at Benjamin Yeaten's house but he was not in
6 that meeting, sir.

7 Q. When you spoke to Sam Bockarie, did he discuss what
8 your assignment would be in Buedu?

9 A. In Buedu he told me that the Scorpion unit - there was
15:54:04 10 not going to be any double command on the grounds of the
11 RUF. He said there would be only one command. There was
12 not going to be two commands, so every one of us should
13 take command from him.

14 Q. When you had that discussion with Bockarie, was anyone
15:54:24 15 else present?

16 A. Yes, Jungle was there, Sampson was there, Marzah also
17 was there, but then I had been informed, they said Keita,
18 there is no big deal in that. We just have to cooperate.
19 That was the time he came with the letter of assignment for
15:54:42 20 me."

21 He is asked to repeat the answer.

22 "Q. Who came with the letter of assignment for you? Who
23 gave you the letter of assignment.

24 A. Sam Bockarie. Sam Bockarie. General Sam Bockarie.

15:55:00 25 Q. When you say letter of assignment, can you explain what
26 that was?

27 A. When I was coming to the RUF I had not been with the
28 RUF before. I said it should be in writing that I was
29 going to be the commander of the Scorpion with the RUF and

1 then he told me yes. From there we talked to Benjamin
2 Yeaten and he told me, 'Yes, Sam Bockarie has already given
3 you the document?' And I said yes, sir. Then he said,
4 'Okay, that document was signed by President Taylor', and
15:55:39 5 he said I should maintain that document very well."
6 He goes on to describe it being destroyed in a fire. Page
7 2001, line 3:
8 "Q. Then you said after you got the paper you had another
9 conversation; is that correct?
15:56:06 10 A. Yes, over a Yeasu radio."
11 Are you sure he wasn't allowed to use the radio
12 communications to communicate with Benjamin Yeaten, Mr Sesay?
13 MR KOUMJIAN: Excuse me. The witness has not yet said
14 that. When asked if he had access to the radio he said he never
15:56:28 15 used it, so the question is leading.
16 PRESIDING JUDGE: I thought the witness said - denied
17 earlier categorically that Abu Keita did not have access to a
18 radio.
19 MR GRIFFITHS: That was the evidence I heard.
15:56:51 20 PRESIDING JUDGE: Which would make the question admissible.
21 Please go ahead.
22 MR KOUMJIAN: At this point, it is page 103 on my LiveNote,
23 the last few lines.
24 PRESIDING JUDGE: What are you pointing to? What are you
15:57:09 25 alluding to, Mr Koumjian?
26 MR KOUMJIAN: Your Honour, the witness was asked if he had
27 access. The question was: "Did Abu Keita have access to RUF
28 communication facilities?" I see the witness began his answer
29 "no", so I withdraw my objection.

1 MR GRIFFITHS: I am grateful.

2 Q. So looking at this passage on page 2001, Mr Sesay, this
3 statement that Abu Keita was in contact over the radio with
4 Benjamin Yeaten, is this true or false?

15:57:56 5 A. It's false.

6 Q. Now, let's see if we can make some progress with the
7 remainder of this witness's evidence before the close of play
8 today. Let's go to page 2005 please, line 14:

9 "Q. Can you tell us, when Sam Bockarie came to Buedu with
10 the 300 boxes of ammunition what was the atmosphere amongst
11 the RUF present in Buedu?

12 A. They were very happy and then he called a muster, he
13 called a meeting, and then those of us who were vanguards,
14 he invited us into his house to discuss about the
15 ammunition and then the plan that we should take towards
16 the ammunition.

17 Q. Okay. Let us take these slowly. You mentioned several
18 meetings with Sam Bockarie. On that day when Sam Bockarie
19 came back, what was the first meeting he had that you
15:59:30 20 recall?

21 A. The first meeting you know was not with me in
22 particular, but it was the whole RUF. He called Issa Sesay
23 who was in that meeting, Lawrence Womandia was there, SB
24 Rogers, Lawrence Womandia, Akim, Leather Boot, and he said
15:59:55 25 that is the material, that is the ammunition, and the
26 operation is that we should take over Kono and Makeni and
27 to terrorise the highway. He said because Kono was a
28 strategic area for us to get arms so that the mining will
29 continue.

1 Q. Where did this meeting with these commanders take
2 place?

3 A. The meeting took place at his house and then from there
4 that a vanguard meeting, which was in closed doors in his
16:00:32 5 bedroom. The people who they call vanguards, those were
6 the people who brought the war into Sierra Leone. Those
7 were the ones they call the vanguards."

8 He provides further clarification of that and then, when we
9 go to page 2007, line 6:

16:00:59 10 "Q. This first meeting that Bockarie had at the house
11 after bringing the materials, you mentioned some
12 commanders. Can you explain to us" - line 12 - "you said
13 Bockarie said Kono was strategic, did he explain why?

14 A. He said because we needed to generate funds for the
16:01:21 15 RUF. Then the only place where we can get more resources
16 to generate funds was Kono, so we could be able to do
17 mining.

18 Q. So after the meeting at the house you said there was a
19 meeting in Bockarie's bedroom of the vanguards?

16:01:41 20 A. Yes.

21 Q. Were you allowed into that meeting?

22 A. No, they never allowed me to attend the meeting, sir,
23 it was only for vanguards and I was not a vanguard."

24 Now let's pause there. First of all, this sequence of
16:01:59 25 events, as described by the witness, does that accord with your
26 recollection of meetings held at Bockarie's house prior to the
27 operation which you led to capture Kono?

28 A. No. We did not hold a meeting in Bockarie's house.

29 Q. Where was the meeting held?

1 A. The meeting was held at Waterworks and it's about half a
2 mile plus from Buedu.

3 Q. And help us, was Abu Keita present in any meeting to plan
4 the attack on Kono?

16:02:50 5 A. No. He did not attend that meeting. Not at all. He was
6 not there.

7 Q. Why not?

8 A. Well, Abu Keita was not a commander. He only came to seek
9 refuge with Sam Bockarie. So he was not in any position to
10 attend the meeting where we planned for the attack on Kono.

11 Q. Line 25, page 2007:

12 "Q. After the closed-door vanguard meeting was there
13 another meeting?

14 A. There was a muster parade, it was not a meeting, where
15 all the soldiers assembled at the military grounds before
16 Kaisuku's office. That was the time he instructed Issa
17 Sesay that this mission - that the mission is that there
18 should be no retreat, no surrender, you should make sure
19 you take over Kono and Makeni. And then he said President
16:03:38 20 Tayl or said they should be very vigilant and maintain the
21 ground of the RUF during that muster parade."

22 What is a muster parade, Mr Sesay?

23 A. Well, a muster parade is when soldiers assemble at a place
24 in the morning to offer prayers every morning and every evening
16:04:02 25 to pray, and if any commander he had any information he would
26 tell the soldiers during the muster parade. And if the soldiers
27 or the fighters had problems they would come forward and explain
28 themselves to the commander during a muster parade.

29 Q. So that a muster parade would be comprised of how many men?

1 A. Well, that depends on the location where it is hosted but,
2 as far as I know, a muster parade is not a place where people go
3 and plan for attacks. It is not a place where people go and
4 discuss military operations, like attacks. A muster parade is a
16:05:18 5 prayer ground, a place where the commander will be privy to the
6 problems that affect the fighters.

7 Q. Now do you recall at any muster parade it being announced,
8 or you being instructed - because you recall the witness says
9 specifically about you:

16:05:47 10 "That was the time he instructed Issa Sesay that this
11 mission, there should be no retreat, no surrender. They should
12 make sure they take over Kono and Makeni, and that they were to
13 terrorise the highway."

14 Do you recall any such instruction being given to you,
16:06:13 15 Mr Sesay?

16 A. No. Sam Bockarie did not give any instruction during a
17 parade before I departed to attack Kono. He did not give me any
18 instruction during parade.

19 Q. Was there a discussion - was there a discussion at any of
16:06:36 20 the - at any meeting held prior to the attack on Kono in December
21 1998 as to Kono's strategic importance as a diamond producing
22 area?

23 A. No, we did not discuss that. When Sam Bockarie, myself and
24 the others - I mean myself, Sam Bockarie, Mike Lamin, SYB Rogers,
16:07:07 25 Eddie Kanneh, Lawrence Womandia, Rashid Sandy, when we held the
26 meeting at Waterworks, Sam Bockarie did not talk anything about
27 diamond issues. He only told me that I should prepare myself to
28 go and attack Kono.

29 Q. Now tell me, Mr Sesay, if you weren't attacking Kono for

1 diamonds, why was it being attacked in December 1998?

2 A. Well, one, we had RUF troops in Kono, since February 1998
3 they had been there, and ECOMOG was in Kono and Kamajors also
4 were there. And the ECOMOG - we were fighting against the ECOMOG
16:07:54 5 and the Kamajors at that time.

6 Q. And so? I'm not sure I understand your answer, Mr Sesay?

7 A. Well, could you ask me the question again.

8 Q. Of course. If the RUF were not attacking Kono in order to
9 secure it because it was a diamond producing area, why was it
16:08:27 10 attacked?

11 A. Well, Kono is part of Sierra Leone and, before the attack
12 on Kono, RUF was already deployed in Kono. So if the RUF was not
13 deployed in Kono we wouldn't have obviously decided to go and
14 attack Kono. But the RUF was deployed in Kono and they were
16:08:51 15 almost sharing part of the town with ECOMOG.

16 PRESIDING JUDGE: So are you saying attacked Kono because
17 the RUF were there?

18 THE WITNESS: Yes, RUF were there and the ECOMOG were there
19 and the RUF were deployed very close to ECOMOG and Sam Bockarie
16:09:14 20 had said that the mercenaries that Tejan Kabbah had called for,
21 the Sandline, they were in Kono mining. So he said we should
22 attack Kono and destroy President Kabbah's plans.

23 PRESIDING JUDGE: That means remove the Sandline miners?

24 THE WITNESS: Yes, ma'am, to remove the Sandline and the
16:09:40 25 ECOMOG from Kono.

26 PRESIDING JUDGE: But isn't that what counsel is asking
27 you? Isn't that what you're asking?

28 MR GRIFFITHS:

29 Q. Let me put it in simple terms, Mr Sesay, I hope: When the

1 capture of Kono was discussed, was the discussion about "We need
2 to seize Kono to get diamonds" or was it about seizing Kono for
3 any other reason?

16:10:28 4 A. Yes. The attack on Kono, like Sam Bockarie said it, he
5 said President Kabbah had brought mercenaries and those are the
6 Sandlines, they were the ones helping him to fight against the
7 RUF. So he said we should seize Kono so that we will sabotage
8 President Kabbah's plan together with the Sandlines.

16:10:58 9 Q. Okay. Now, according to this witness, you had been
10 instructed to terrorise the highway. Did you terrorise Kono
11 after you captured it?

12 A. No. I did not terrorise the people of Kono because even
13 the enemies against whom I was fighting, some surrendered and we
14 did not kill them. So, why should I terrorise the people?

16:11:24 15 Q. Thank you. Now page 2008. On that page Abu Keita also
16 told these judges this, line 10:

17 "Q. After this meeting, was there an offensive?

18 A. Yes. That was the time we took the offensive against
19 Kono and Makeni, and then myself, there was an operation
16:11:54 20 from Segbwema, from Bunumbu to Segbwema to Jumo Kafebu,
21 Gbava and Bendu Junction."

22 Now, we had mentioned these locations before, Mr Sesay, and
23 what I am wanting to ask you now is this: At the time you
24 embarked upon the attack on Kono, were you aware of a
16:12:22 25 simultaneous attack involving Abu Keita on the locations he told
26 these judges about?

27 A. No, because before my departure to Kono, there was no plan
28 to attack Segbwema. It was after I had captured Kono, that was
29 when the ECOMOG withdrew from Bandajuma Yaweh, Bunumbu, Manowa,

1 and that was the time Sam Bockarie sent Mike Lamin, telling them
2 to attack Segbwema, but before my departure for Kono we hadn't
3 such a plan. It was because Kono fell to us and the ECOMOG
4 withdrew from that area, that was when Sam Bockarie said they
16:13:12 5 should attack Segbwema.

6 Q. And just to be clear, when Sam Bockarie gave that order,
7 was it an order also directed at Abu Keita?

8 A. No. It was Mike Lamin that was directed by Sam Bockarie.

9 PRESIDING JUDGE: If I may enquire, Mr Sesay, this attack
16:13:50 10 on Segbwema, did the 20 to 25 men that came with Abu Keita
11 participate in that attack?

12 THE WITNESS: Yes. They went with Abu Keita, but they were
13 not armed. I think it was Mike Lamin who gave arms to some of
14 them during the attack on Segbwema.

16:14:20 15 PRESIDING JUDGE: And when they participated in this
16 attack, they did so under whose command?

17 THE WITNESS: They did it under Mike Lamin's command
18 because Mike Lamin was the commander in charge of the attack.

19 JUDGE DOHERTY: Mr Sesay, are you saying that 20 to 25 men
16:14:46 20 went on an attack with their two hands the one length and nothing
21 in those hands?

22 THE WITNESS: No, my Lord. I said during the attack some
23 of them were issued arms by Mike Lamin, but, my Lord, we used to
24 go on a fight, on an attack, we have some armed men and some are
16:15:14 25 not armed. Sometimes we only have 80 armed men or we have 50
26 unarmed men.

27 THE INTERPRETER: Your Honours, could the witness be asked
28 to repeat that area slowly?

29 PRESIDING JUDGE: Mr Sesay, you have to explain this again

1 to us. The interpreter could not catch up with you. We need to
2 understand how unarmed men can go on an attack. It is
3 interesting. Explain please.

4 THE WITNESS: My Lord, that is something very common within
16:15:49 5 the RUF, that when the RUF plan an attack, you will have the
6 armed men and you know the amount of the armed men, and you will
7 have the unarmed men, and the unarmed men, they will be at the
8 rear during the attack, behind the armed men. If fighters got
9 wounded, the unarmed men would collect them and take them to the
16:16:12 10 rear, and then they will be able to get treatment. It was not
11 everybody in the RUF, not all fighters carried guns. We have so
12 many unarmed men.

13 MR GRIFFITHS:

14 Q. Now, the witness continues, that same page, page 2008, line
16:16:37 15 28:

16 "Q. Just so we have an idea, about how long before Kono
17 Town fell did Sam Bockarie come back with the 300 boxes of
18 ammunition?

19 A. When Sam Bockarie came, that was the time he said the
16:16:57 20 materials have come, and that was the time the offensive
21 started.

22 Q. We're just trying to get an idea of approximately how
23 much time before Christmas day, before Kono fell, did Sam
24 Bockarie come with the ammunition, how many days, or
16:17:15 25 weeks, or months. Can you estimate?

26 A. I am unable to estimate that, sir.

27 Q. How soon after Sam Bockarie came with the ammunition
28 did the operation start?

29 A. Just when he came with the ammunition. There was no

1 wasting time. The operation started straight. It was only
2 the meeting that he had in Buedu. Immediately after the
3 meeting, Issa Sesay was dispatched.

4 Q. Where was Issa Sesay sent?

16:17:47 5 A. Issa Sesay was sent to Kono, along with Morris Kallon
6 and Akim.

7 Q. Akim the SLA?

8 A. Yes.

9 Q. Sir, during this offensive did you play a part in that
16:18:00 10 offensive?"

11 And he goes on to repeat what I mentioned earlier, but then
12 this, line 24:

13 "A. Gbava. And then Sam Bockarie further instructed that
14 if any air raid took place, we should burn down the place
16:18:21 15 if there was any resistance.

16 Q. Was Sam Bockarie's order to burn down if there is any
17 resistance, was that carried out?

18 A. Yes, yes."

19 Do you recall such an instruction being given by Sam
16:18:47 20 Bockarie, Mr Sesay?

21 A. Well, during the meeting that we held for the attack on
22 Kono, Sam Bockarie did not give such an instruction, and when I
23 attack Kono, they had burnt down Kono since April/May of 1998.

24 So when I attacked Kono, starting from Kono up to Makeni, there
16:19:14 25 was no village that we burned down on the way because we went
26 through towns but we did not burn down any house.

27 Q. Can we go to page 2020 please, line 1:

28 "Q. Sir, where were you when the attack on Freetown
29 happened?"

1 A. When the attack on Freetown happened, I was in Buedu.

2 Q. Where was Sam Bockarie?

3 A. Sam Bockarie was in Buedu. That was the time I told
4 you that he came with those jeans, trousers and T-shirts
16:20:03 5 and the car.

6 Q. How did you become aware of what was happening in
7 Freetown?

8 A. At 3 o'clock we listened to BBC Focus on Africa, and
9 one commander spoke from Freetown saying that they were in
16:20:18 10 control of State House. Sam Bockarie became angry. He
11 called up Issa Sesay and Morris Kallon, asking them why
12 they should allow someone to call the BBC while he, the
13 commander, has not called the BBC."

14 Did you receive such a call from Sam Bockarie at the time
16:20:48 15 of the Freetown invasion, Mr Sesay?

16 A. No. I did not get such a call. Sam Bockarie did not call
17 me, because how could he have called me to ask me - to
18 tell me to ask another commander to call the BBC, when I was not
19 in Freetown and he was not a commander or part of the people who
16:21:15 20 attacked Freetown. No.

21 Q. "A. Then from there, he himself called the BBC when they
22 were in Buedu. He was speaking to Robin White over the
23 satellite phone. He shot and said, 'We are coming around
24 the State House,' but we were in Buedu."

16:21:37 25 Now, at the time of the Freetown invasion, Mr Sesay, where
26 were you physically?

27 A. I was in Makeni.

28 Q. Was it your habit at that time to listen to the BBC?

29 A. Yes, sometimes I listened to the BBC.

1 Q. Do you recall, during the course of the Freetown invasion,
2 hearing Sam Bockarie on the BBC speaking to Robin White?

3 A. Yes.

4 Q. And what did Bockarie say during the course of that
16:22:18 5 broadcast?

6 A. Bockarie was claiming that those were his men and they
7 opened fire around him, and when Robin White asked him where the
8 firing was coming from, he said, "If there is any bush shaking,
9 he will comb that bush." So he was just being boastful, but
16:22:43 10 realistically, the men who attacked Freetown did not take any
11 instructions from him.

12 PRESIDING JUDGE: Mr Interpreter, if there is any bush,
13 what?

14 THE INTERPRETER: If there is any bush shaking, he said he
16:23:03 15 will comb the bush.

16 PRESIDING JUDGE: Meaning what? What does that mean?

17 MR GRIFFITHS: Perhaps I should ask the witness.

18 Q. What does that phrase mean, Mr Sesay?

19 A. Well, that was just something that he said. For example,
16:23:19 20 if someone is passing by the wayside and there is a shake that
21 goes on in the bush, maybe he will feel there is an ambush there.
22 Then we will just open fire there and shoot into the bush. So
23 that was what he was saying, that if there was any bush shaking,
24 he would just comb the bush with the guns, because I recall when
16:23:41 25 he was speaking with Robin White, he instructed his bodyguards to
26 open fire, so Robin white overheard the firing and he asked, he
27 said, "What is that?" And he said, "Up to this moment there is
28 firing going on."

29 Q. Where was Bockarie physically at the time he gave that

1 interview?

2 A. Bockarie was far off in Buedu, whilst the people were in
3 Freetown.

4 PRESIDING JUDGE: So the witness is saying that Bockarie
16:24:11 5 was claiming that the people in Freetown were his men, and he
6 asked the men actually beside him to fire, to convince Robin
7 White that he was in Freetown.

8 MR GRIFFITHS: That is my understanding of the witness's
9 testimony.

16:24:27 10 PRESIDING JUDGE: Is that correct?

11 MR GRIFFITHS:

12 Q. Is that right, Mr Sesay?

13 A. Yes, ma'am. That was what he was claiming, that he was
14 amongst the attackers.

16:24:36 15 MR GRIFFITHS:

16 Q. So, in effect, he was masquerading that he was in Freetown,
17 when in fact he was in Buedu at the time asking his bodyguards
18 around him to give the impression that they were actually
19 fighting in Freetown; is that correct?

16:24:53 20 A. Yes, that is what happened.

21 PRESIDING JUDGE: May I ask why he would do that? Why was
22 Bockarie trying to pretend that he was in Freetown?

23 THE WITNESS: My Lord, Sam Bockarie is a boastful man. He
24 was just bluffing, because he had access to the satellite. He
16:25:19 25 just wanted to make himself as though he was powerful and to make
26 himself fearful to the world.

27 PRESIDING JUDGE: Yes, but why in particular Freetown?
28 Why?

29 THE WITNESS: Well, my Lord, Freetown is the seat of power.

1 It's the city. Freetown is one of the most - is the most
2 important city in Sierra Leone, it is the seat of power.

16:26:06 3 JUDGE DOHERTY: Mr Griffiths, are you moving on to a new
4 topic, because there is a matter I intended to clarify in the
5 previous topic concerning Kono when the witness said they had
6 burnt it down - page 116, line 14 - but I don't know who the
7 "they" is.

8 MR GRIFFITHS: Very well.

16:26:26 9 Q. You say that by the time you captured Kono it had already
10 been burnt down, Mr Sesay. Who by?

11 A. Yes, my Lord, during the retreat of the RUF/AFRC in Kono in
12 May, whilst the ECOMOG were advancing, that - at that time the
13 AFRC and the RUF took part in the burning of Kono and of course
14 the ECOMOG and the Kamajors who were advancing, they also were
16:26:54 15 sending bombs into Kono and the Alpha Jets also was bombing Kono.
16 Because I heard one time when Superman complained to Sam Bockarie
17 that the fighters don't go to the battlefield to fight, that is
18 the RUF fighters, and Bockarie told Superman that any fighter
19 that refuses to go to the battlefield to fight, they should burn
16:27:17 20 down his house. So the RUF went on with the burning of the
21 houses at that time, including the AFRC. And the ECOMOG too,
22 whilst they were advancing to take over Kono, they were bombing.

23 MR GRIFFITHS:

16:27:45 24 Q. Let's see if we can complete one other short topic before
25 we have to draw stumps today. Let me just read the passage out
26 to you and then seek your comment. Page 2024 please, line 9:

27 "Q. When you were with the RUF did you become aware of any
28 strategies to deal with attacks from jets?"

29 Line 19:

1 "A. The strategy was the monitor. Zedman monitored the
2 radio stations from the Nigerian ECOMOG who were based in
3 Lungi. Also Memunatu and Seta, they monitored from
4 Monrovia. If a jet takes off from Monrovia on the RIA,
16:28:41 5 because Victor Malu who was the first commander was staying
6 in Monrovia, so they will call 448, so the radio operator
7 would ring a bell and everybody would escape. That was the
8 only strategy that I knew about."

9 Were you aware of such a strategy, Mr Sesay?

16:29:05 10 A. Yes. I knew that - I knew it but the people whose names he
11 had made mention of, he lied on them, because with Zedman, that
12 strategy only works with an operator that knew the Morse code
13 operation and Zedman did not know about the Morse code. It was
14 only the SLA who knew about the Morse code communication. And
16:29:32 15 even Zedman throughout out '98, '99 he was not based in Buedu,
16 you see. It was one SLA who was monitoring the set in Buedu who
17 used to monitor the activities of the ECOMOG and the Alpha Jets.

18 Q. What was the name of that SLA?

19 A. I do not recall his name now. I do not remember his name,
16:29:54 20 but he was in Buedu. He was monitoring the set and he would take
21 the message to Sam Bockarie and --

22 Q. So in what format were the ECOMOG messages transmitted, was
23 it radio messages or Morse code?

24 A. It was through Morse code. It was through Morse code on
16:30:22 25 their net, but they were using the Thompson radio. It was a
26 Thompson radio that the operator was using, together with another
27 set that he used to monitor messages from the ECOMOG. So if he
28 knew - he knew the Morse code communication, so he was decoding
29 it. When he got it he would decode it and bring it over to Sam

1 Bockarie. But no RUF operator knew about that communication, so
2 RUF was unable to do that.

3 Q. And one final matter, if we could deal with this briefly.
4 Were Memunatu and Seta in Monrovia also involved in monitoring
16:31:04 5 the movement of ECOMOG jets?

6 A. No. Memuna was not monitoring the ECOMOG jets because she
7 could not monitor the Morse communication because she did not
8 know about it. And Seta was not an operator. She never became
9 an operator, in fact. And Seta was Jungle's wife. She was not
16:31:33 10 an operator. And from February to December '98 - from March to
11 December '98, the Alpha Jet was flying from Lungi, it was no
12 longer flying from Monrovia. It was in 1997 to January/February
13 of '98 that the Alpha Jets started coming from Monrovia, but from
14 March of '98 it was flying from Lungi airport and assaulting
16:32:03 15 Kailahun, Kono and RUF positions, bombarding those areas.

16 MR GRIFFITHS: Thank you very much, Mr Sesay. Would that
17 be a convenient point, Madam President?

18 PRESIDING JUDGE: Yes, indeed. Mr Sesay we have come to
19 the day's end and I would like to caution you not to discuss your
16:32:23 20 evidence. We will continue tomorrow at 9 o'clock.

21 [Whereupon the hearing adjourned at 4.33 p.m.
22 to be reconvened on Friday, 6 August 2010 at
23 9.00 a.m.]

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10:52:35 25

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I N D E X

WITNESSES FOR THE PROSECUTION:

NAOMI CAMPBELL	45462
EXAMINATION-IN-CHIEF BY MS HOLLIS	45462
CROSS-EXAMINATION BY MR GRIFFITHS	45481
RE-EXAMINATION BY MS HOLLIS	45504

WITNESSES FOR THE DEFENCE:

DCT-172	45519
EXAMINATION-IN-CHIEF BY MR GRIFFITHS	45519

EXHIBITS:

Exhibit D-424 admitted	45518
Exhibits D-425A and B admitted	45519