



Case No. SCSL-2003-01-T

THE PROSECUTOR OF
THE SPECIAL COURT
V.
CHARLES GHANKAY TAYLOR

THURSDAY, 6 MAY 2010
2.00 P. M.
TRIAL

TRIAL CHAMBER II

Before the Judges:

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

For Chambers:

Ms Erica Bussey

For the Registry:

Ms Rachel Irura
Ms Zainab Fofanah

For the Prosecution:

Ms Brenda J Hollis
Ms Kathryn Howarth
Ms Maja Dimitrova

For the accused Charles Ghankay
Taylor:

Mr Terry Munyard
Mr Silas Chekera
Ms Logan Hambri ck

1 Thursday, 6 May 2010

2 [Open session]

3 [The accused present]

4 [Upon commencing at 2.00 p.m.]

14:01:36 5 PRESIDING JUDGE: Good afternoon. We'll take appearances
6 first, please.

7 MS HOWARTH: Good afternoon, Madam President, your Honours,
8 counsel opposite. For the Prosecution this afternoon, Ms Brenda
9 J Hollis, myself Ms Kathryn Howarth and Ms Maja Dimitrova.

14:02:34 10 MR CHEKERA: Good afternoon, Madam President, your Honours,
11 counsel opposite. For the Defence, Terry Muniyard, Silas Chekera,
12 Logan Hambri ck and Howie Al ot.

13 PRESIDING JUDGE: I think Mr Al ot is here for the first
14 time.

14:03:02 15 MR CHEKERA: I understand he has been introduced to the
16 Court before.

17 PRESIDING JUDGE: Okay. In any event he is welcome to the
18 Court. Mr Chekera, are you taking the next witness?

19 MR CHEKERA: I will be leading the next witness in
14:03:12 20 evi dence.

21 PRESIDING JUDGE: Perhaps you could introduce him.

22 MR CHEKERA: The next witness will be DCT-226.

23 PRESIDING JUDGE: The language?

24 MR CHEKERA: The witness will be testi fying in Liberian
14:03:29 25 English and he will swear on the Bible.

26 PRESIDING JUDGE: Are the interpreters in place?

27 THE INTERPRETER: Yes, your Honour, we are in place.

28 PRESIDING JUDGE: Please call the witness then.

29 Mr Chekera, what are the protective measures, if any, for this

1 witness?

2 MR CHEKERA: Yes, Madam President. The witness is subject
3 to protective measures relating to the use of a pseudonym and
4 non-disclosure of identifying information in terms of your
14:04:30 5 decision of 27 May 2009. The decision on urgent Defence
6 application for protective measures for witness and for
7 non-disclosure of public material and in particular paragraphs
8 (a) and (b) are the operative part of that decision. The witness
9 is prepared to testify in open court without his protective
14:05:00 10 measures and if they could be rescinded so that he can testify
11 openly.

12 PRESIDING JUDGE: The Prosecution - I do not reckon that
13 you oppose this application?

14 MS HOWARTH: No.

14:05:15 15 PRESIDING JUDGE: Then before the witness is sworn, the
16 protective measures mentioned by Defence counsel above are
17 rescinded in respect of witness DCT-226. Please swear the
18 witness.

19 WITNESS: DCT-226 [Sworn]

14:06:38 20 EXAMINATION-IN-CHIEF BY MR CHEKERA:

21 Q. Mr Zaymay, please state your full name for the record.

22 A. I am T Edward Zaymay.

23 Q. And the T, what does it stand for?

24 A. The T means Teman. That's my country name.

14:07:19 25 Q. How do you spell Teman?

26 A. Yes, I do.

27 Q. How do you spell Teman?

28 A. T-E-M-A-N.

29 Q. When were you born?

- 1 A. I was born on 8 February 1958.
- 2 Q. And where were you born?
- 3 A. I was born in Gborplay.
- 4 Q. Besides the names Edward Teman Zaymay, were you or have you
14:07:57 5 been known by any other names?
- 6 A. Yes, my name - my popular name is T Zaymay.
- 7 Q. Any other name other than T Zaymay?
- 8 A. No.
- 9 Q. What nationality are you?
- 14:08:20 10 A. I am from Liberia.
- 11 Q. And what tribe or ethnic group do you belong to?
- 12 A. I am a Gio tribesman and I hailed from Nimba County.
- 13 Q. What languages do you speak?
- 14 A. I speak Gio.
- 14:08:48 15 Q. Besides Gio do you speak any other languages?
- 16 A. No.
- 17 Q. Do you speak Liberian English?
- 18 A. Yes, I am a Liberian so I speak Liberian English.
- 19 Q. Are you currently employed?
- 14:09:09 20 A. No.
- 21 Q. And what do you do for a living?
- 22 A. I do farming to feed my family.
- 23 Q. And do you have a family?
- 24 A. Yes.
- 14:09:31 25 Q. Tell us about your family. Are you married?
- 26 A. Yes, I have two wives.
- 27 Q. And children? Do you have children?
- 28 A. About nine.
- 29 Q. What is your level of education?

1 A. I stopped in the 8th grade in 1979.

2 Q. And when you stopped school, did you enter into any
3 occupation?

4 A. Yes.

14:10:13 5 Q. What occupation did you go into?

6 A. My first job was in the army.

7 Q. When did you join the army?

8 A. I joined the army in 1979.

9 Q. Where did you join the army and what were you doing in the
14:10:34 10 army when you joined?

11 A. I was recruited in Nimba County.

12 THE INTERPRETER: Your Honours, could the witness be asked
13 to slow down and speak clearly.

14 PRESIDING JUDGE: Mr Witness, you are going to have to
14:10:50 15 speak a little slower than you normally would because whatever
16 you are saying is being interpreted to us in English and it's
17 being recorded. So you need to slow down. Now, you were asked a
18 question. What was the question you asked the witness?

19 MR CHEKERA: The question was when he joined the army, what
14:11:13 20 did he do in the army.

21 PRESIDING JUDGE: Yes. Please repeat your answer slowly.

22 THE WITNESS: Yes. I said I joined the army in 1979.

23 MR CHEKERA:

24 Q. Yes. Did you receive any training?

14:11:30 25 A. Yes.

26 Q. Where did you receive your training?

27 A. The 2nd Battalion, Todee.

28 Q. Sorry, the name again?

29 A. 2nd Battalion, Camp Todee.

1 Q. Camp Todee is spelled Camp T-O-D-E-E?

2 A. No.

3 Q. Sorry, would you be able to assist me with the spelling of
4 Todee?

14:12:08 5 A. Yes. T-O-D-E-E.

6 Q. Thank you. How long was the training for?

7 A. The training lasted for nine months.

8 Q. And what was the nature of the training?

9 A. It was an infantry training.

14:12:45 10 Q. And after training for nine months, where did you go from
11 there?

12 A. After my graduation from Todee, I stayed on the base and
13 the Military Police commander came and recruited me as a Military
14 Police personnel.

14:13:07 15 Q. Did you receive any training before you became a Military
16 Police personnel?

17 A. Yes.

18 Q. Where did you get the training?

19 A. At the same camp, Todee.

14:13:25 20 Q. And how long was the training as a Military Police
21 personnel, as you put it?

22 A. The training did not last for long. And unknowingly there
23 was a coup plot in the pipeline.

24 Q. We'll come to the coup plot in a minute. For how long

14:13:53 25 were you in training as a Military Police - as a Military Police
26 personnel before the coup?

27 A. After my recruitment as Military Police personnel, the
28 training did not even last for a month.

29 Q. And what happened after that one month?

1 A. There was the 1980 coup plot that brought down Tolbert's
2 government.

3 Q. Was the coup successful? You mentioned a coup plot. Did
4 the coup succeed?

14:14:36 5 A. Yes. That brought Samuel Kanyon Doe to power.

6 Q. And which government was deposed, just to be clear?

7 A. They overthrew the Tolbert regime.

8 Q. And when Samuel Doe came to power, did you remain at the
9 training camp as a Military Police?

14:15:03 10 A. Immediately after the coup, we were called to town as the
11 2nd Battalion to report at the brigade headquarters.

12 Q. And when you refer to town, which town are you referring
13 to?

14 A. Monrovia, BTC.

14:15:27 15 Q. Does BTC stand for anything?

16 A. Barclay Training Centre.

17 Q. And who called you to Barclay Training Centre?

18 A. The commanding general, General Quiwonkpa.

19 Q. Was Quiwonkpa the commanding general of the army?

14:15:57 20 A. Quiwonkpa and Doe joined to overthrow the government. And
21 when I went there, I met Quiwonkpa serving as commanding general
22 of the army.

23 Q. And what happened when you got to Barclay Training Centre?

24 A. When I got to the BTC, they called a formation and we were
14:16:29 25 in formation, especially the 2nd Battalion element that had just
26 graduated from the training, and the commanding general came to
27 speak to us. I was surprised because Quiwonkpa was my tactical
28 sergeant, the staff sergeant at the training base, and when we
29 went to town, I was surprised to see him serve as brigadier

1 general. So he told us that it was not strange, that there had
2 been a great change in the army. So he said, "All soldiers will
3 now take orders from me."

4 Q. And were you given any specific instruction or assignment?

14:17:18 5 A. Yes. We were all briefed by the commanding general that no
6 enlisted man will take orders from any other officer. He said,
7 "You guys should go and patrol through the streets," and that,
8 "If you guys saw any of the Congo people" - he said, "In fact, we
9 have just executed 13 of them." And he said, "There are more
14:18:04 10 that we needed. So if you guys came across any of them, you
11 should arrest them and bring them to me at the brigade
12 headquarters." He said, "No harassment, no looting," and those
13 were the orders.

14 Q. Now --

14:18:28 15 PRESIDING JUDGE: Mr Chekera, two matters for
16 clarification. The first is on page 10 where he is telling us
17 what happened when he went to formation and said, "So he said,
18 'All the soldiers will now take orders from me.'" Is he talking
19 about himself or is he quoting Qui wonkpa?

14:18:54 20 MR CHEKERA: I will clarify.

21 PRESIDING JUDGE: That is one. The other was when he said
22 "all illicit men". I don't know. Is that "enlisted men" or
23 "illicit men"? There's a word I didn't understand.

24 MR CHEKERA: I think that was later on corrected on the
14:19:11 25 record. Initially it was illicit and then it was correct on the
26 transcript to enlisted after the witness referred to the word
27 again for the second time.

28 PRESIDING JUDGE: And also the - is it Congo people?

29 MR CHEKERA: I was going to clarify that.

1 PRESIDING JUDGE: Okay. Please.

2 MR CHEKERA:

3 Q. Firstly, you were telling us about Quiwonkpa addressing you
4 at BTC. When you said he said that all the soldiers who were at
14:19:43 5 BTC should take instructions from me, were you referring to
6 taking instructions from Quiwonkpa or from yourself?

7 A. No. At that time I was just a private soldier. The
8 instruction was given to the entire army by the commanding
9 general of the army.

14:20:10 10 Q. To take instructions from who?

11 A. That not to take orders from any other officer, starting
12 from WO to general, from any other officer because the coup was
13 headed by - from enlisted men from master sergeant down to
14 private. Those were the enlisted men. So he said, "No enlisted
14:20:42 15 man should take any orders from any officer." That was the
16 order.

17 Q. And who were you going to take instructions from then?

18 A. The order given to us by the commanding general that we
19 should go to the field and implement the orders. The commanding
14:21:06 20 general maybe did not want - maybe there were some officers who
21 were in the corner that could have given us orders.

22 PRESIDING JUDGE: Mr Witness, stop. We want to know who
23 you were supposed to take orders from. Who was this person you
24 were supposed to take orders from.

14:21:25 25 THE WITNESS: From there the unit was broken into sections
26 and the master sergeant was the head of the unit.

27 PRESIDING JUDGE: Perhaps something is lost in translation.
28 I don't know. We just wanted a clarification. You were quoting
29 to us something that Quiwonkpa said. He says, "From now on you

1 will take orders from me." "Me" means who?

2 THE WITNESS: He was the commanding general that controlled
3 the army. That all soldiers were now to report to the commanding
4 general.

14:22:09 5 PRESIDING JUDGE: "He" means who?

6 THE WITNESS: General Thomas G Quiwonkpa.

7 PRESIDING JUDGE: Thank you.

8 MR CHEKERA:

9 Q. Now, you mentioned people you referred to as the Congo

14:22:22 10 people. Who were the Congo people?

11 A. The Congo people that I spoke about were members of the
12 True Whig Party that was overthrown by the PRC. That was the
13 group of Congo people.

14 Q. Sorry, the name of the party again? What's the name of the
15 party?

14:22:42 16 A. The True Whig Party.

17 Q. Would you be able to spell the name of the party for us?

18 A. T-R-U-E. W-E [sic]. P-A-R-T-Y. That was the government
19 that was headed by Tolbert and was overthrown by the PRC

14:23:30 20 government.

21 Q. And why were you rounding up the Congo people and arresting
22 them?

23 A. Because I was a soldier and I implemented orders.

24 Q. And do you know why the government was rounding up the
25 Congo people and arresting them?

14:24:04 26 A. Yes.

27 Q. Why was that so?

28 A. Because the government was corrupt.

29 Q. As a result, did you implement the order? Did you round up

1 Congo people and arrest them?

2 A. Not me. The army arrested some of them.

3 Q. And do you know what happened to those Congo people who
4 were arrested?

14:24:45 5 A. Yes.

6 Q. What happened to some of them, if you know?

7 A. Those who were arrested were sentenced at the highest
8 prison camp at Camp Belle Yella, 14 of them.

9 Q. You said - did you say they were sentenced at the highest
14:25:11 10 prison camp? Did you say sentenced?

11 A. Yes. They were sent.

12 Q. Oh, they were sent to camp Belle Yella?

13 A. Yes.

14 Q. I think Belle Yella, the spelling is B-E-L-L-E, Y-E-L-L-A.
14:25:42 15 Is that correct, Mr Witness?

16 A. No.

17 Q. Would you be able to help --

18 PRESIDING JUDGE: No, no, no. It's already on the record.

19 MR CHEKERA:

14:25:51 20 Q. It's already on the record. Thank you.

21 A. Okay. Okay.

22 Q. And do you know what happened to those prisoners who were
23 sent to Belle Yella?

24 A. Yes.

14:26:08 25 Q. What happened to them?

26 A. After 90 days they were released by the commanding general.

27 Q. And, generally, how did the civilians react to the coup in
28 1980?

29 A. The civilians embraced the coup --

1 THE INTERPRETER: Your Honours, could the witness be asked
2 to go over that slowly.

3 PRESIDING JUDGE: Mr Witness, you were a little too fast.
4 Please repeat your answer explaining how the civilians reacted to
14:26:57 5 the coup, slowly.

6 THE WITNESS: The civilians were jubilating. "Native woman
7 born soldier, native woman born soldier," and they were doing
8 that all over the street.

9 MR CHEKERA:

14:27:20 10 Q. Sorry, what was that about native women or native woman
11 born soldier? Was that a song?

12 A. Yes.

13 Q. Now, did you remain in the army after the coup?

14 A. Yes.

14:27:48 15 Q. For how long did you remain in the army after the coup?

16 A. After the coup I remained in the army until the '85
17 invasion.

18 Q. What was the invasion in 1985?

19 A. In 1985 because of tribalism --

14:28:32 20 Q. Yes, please continue.

21 A. Yes. I was one of the survivors during the '85 invasion.

22 I was on my normal duty at the Military Police headquarters at
23 the BTC, the Barclay Training Centre, under the brigade

24 headquarters. One morning, and even before '85, Thomas G

14:29:23 25 Quiwonkpa and Samuel Kanyon Doe, the President then, they were

26 friends. They overthrew the True Whig Party government and

27 Quiwonkpa was brought to take over as commanding general of the

28 army and Master Sergeant Doe as President. Quiwonkpa - I mean

29 Doe was advised --

1 THE INTERPRETER: Your Honours, could the witness be asked
2 to slow down again and go over that.

3 PRESIDING JUDGE: Mr Witness, please slow down again and go
4 over your evidence where you were trying to tell us Doe was
14:30:17 5 advised, et cetera. Repeat from there.

6 THE WITNESS: Before Quiwonkpa and Samuel Kanyon Doe were
7 friends, but the advisers then to Samuel Kanyon Doe by then,
8 people like Bar M-Balleh they started advising Samuel Doe
9 wrongly.

14:30:52 10 MR CHEKERA:

11 Q. Sorry, before you continue would you assist us with the
12 spelling of Samuel Doe's adviser? The spelling of the adviser.
13 You mentioned a name there?

14 A. B-A-R M dash B-A-L-L-E-H. That is how I spell it. Bar
14:31:28 15 M-Balleh.

16 Q. Please continue. What did M-Balleh advise Doe?

17 A. The elders then started advising Doe that you cannot
18 remember when you were small there was a war between the Gio and
19 the Krahn and that war was a great war. When the Gio people
14:32:02 20 succeeded and they were victorious they captured some of the
21 citizens from Grand Gedeh and they took them to Nimba. And the
22 people settled there. They called them the Nimba County Krahn.
23 And there is a big district there in Nimba. So this Quiwonkpa
24 business, Quiwonkpa is seeking more popularity in the army than
14:32:45 25 you, the President. This is a man you've got to be careful with.
26 Doe was a good leader. Doe brought a lot of development. He was
27 a soldier. But they continued brainwashing him. We did not
28 know --

29 Q. Just pause there a minute. Sorry. Who continued to

1 brai nwash Doe?

2 A. Hi s advis ers and hi s elders, hi s own country peopl e.

3 Q. And when you say hi s own country peopl e, whi ch peopl e are
4 you referri ng to?

14:33:33 5 A. The elderl y peopl e, the Krahn peopl e.

6 Q. Yes. Pl ease conti nue. You were sayi ng that they conti nued
7 to brai nwash Doe. Pl ease conti nue from there.

8 A. Then one morni ng when we went to watch around, we heard
9 over ai r that Qui wonkpa had been released of hi s commandi ng

14:34:06 10 general posi ti on and he' s been transferred to the Senate as

11 Secretary-General. And Qui wonkpa was our own native man i n the

12 army, especi ally the Gi o and the Mano peopl e from Ni mba County,

13 and we were i n the majori ty i n the army. So when Qui wonkpa went

14 to the offi ce, he was i nvi ted to go to the mansi on. When he

14:34:51 15 went, he refused to take up that assi gnment. He sai d, "No, I am

16 a career soldi er. I am not educat ed to go and serve as

17 Secretary-General." So he refused to take up the assi gnment and

18 he went back to the barracks.

19 When he came, an alarm was blown and every one of us, the

14:35:19 20 Gi o group, we were sad. So some other ki nsmen from Ni mba started

21 telli ng hi m that he shoul dn' t take up the assi gnment. They asked

22 hi m to refuse that assi gnment. And Qui wonkpa sai d he wi ll not

23 take that assi gnment and he sai d he wi ll not stay as commandi ng

24 general. He' s opt ed to leave the country. But other peopl e told

14:35:51 25 hi m to stay and resist and that we shoul d put up a fi ght and who

26 were ready to support hi m to bring down the Samuel Kanyon Doe

27 government, Qui wonkpa bei ng --

28 Q. Sorry, j ust fi ni sh the sentence before I i nterpose.

29 A. Okay. So Qui wonkpa was rel iev ed of hi s post and he l eft

1 the barracks.

2 Q. Where did Quiwonkpa go when he was released, or rather
3 relieved of his post?

4 A. He said he would not continue to stay in the barracks and
14:36:34 5 that the barracks was for soldiers and he was now a civilian, so
6 he went to live with a Lebanese friend on Center Street in
7 Monrovia. That was where he was living.

8 Q. Now, when you gave this long explanation, you were trying
9 to explain to us about the coup in 1985. Could you please go
14:36:58 10 back and explain how this relates to the coup in 1985?

11 A. That is where I'm heading to. Quiwonkpa left and from his
12 Center Street residence and left Liberia. Nobody knew his
13 whereabouts. And we remained loyal to the state. That is the
14 Nimba citizens. In fact, I met Quiwonkpa in the army as a staff
14:37:40 15 sergeant.

16 Q. Let me just stop you there. Do you remember the year that
17 Quiwonkpa left the army?

18 A. Yes.

19 Q. What year was that?

14:37:58 20 A. 1983.

21 Q. In that year do you remember anything else of note
22 happening in Liberia?

23 A. Yes.

24 Q. Yes, what happened in 1983?

14:38:21 25 A. In 1983 there was the Nimba --

26 THE INTERPRETER: Your Honours, the last word was not clear
27 to the interpreter.

28 PRESIDING JUDGE: Please repeat your answer. In 1983 what
29 happened?

1 THE WITNESS: There was the Nimba raid in 1983.

2 MR CHEKERA:

3 Q. What was the Nimba raid?

4 A. Yes, I was assigned in Monrovia and within the 5th

14:39:05 5 Battalion in Nimba, when I went to work by then I was assigned

6 with Colonel Alfred Zeh, one of the PRC members at Capitol

7 Building as a special bodyguard of the Military Police.

8 Q. Just a minute. The name of the colonel, Alfred who?

9 A. Colonel Alfred Zeh.

14:39:35 10 Q. How do you spell the second name Zeh?

11 A. Z-E-H.

12 Q. Thank you. Please continue with your explanation?

13 A. So when I went to work in the morning at the Capitol

14 Building I saw the Military Police who were assigned with the PRC

14:40:01 15 members there. We were about 22. So I saw every one of them

16 downstairs and they said that all Nimba citizens assigned within

17 the MP unit should go on one side. So when I went they asked me

18 to go on the other side to join the Nimba group. And then there

19 was an order that all of us should report back to the MP

14:40:39 20 headquarters. The Gio people - he said they had attacked the

21 Charles Julu residence in LAMCO Nimba and they killed his

22 children.

23 Q. Who said the Gio people attacked Charles Julu's residence?

24 A. Colonel Alfred Zeh, my chief.

14:41:13 25 Q. Yes, please continue. You told me about the attack on

26 Charles Taylor's children in Nimba?

27 PRESIDING JUDGE: There's a location in Nimba, LAMCO or

28 something?

29 MR CHEKERA: Yes.

1 PRESIDING JUDGE: What did you say?

2 THE WITNESS: LAMCO Yekepa. LAMCO Yekepa. That is where
3 the attack took place. Yekepa is located in Nimba.

4 JUDGE LUSSICK: Mr Chekera, I think there's something else
14:41:46 5 you ought to correct as well. You said the attack on Charles
6 Taylor's children. That's not correct.

7 MR CHEKERA: If I said Charles Taylor then --

8 PRESIDING JUDGE: You did.

9 MR CHEKERA: My apology. I will come back to that and
14:42:01 10 clarify:

11 Q. Firstly did you say LAMCO in Yekepa?

12 A. Yes.

13 Q. LAMCO is L-A-M-C-O. Do you know what LAMCO stands for?

14 A. LAMCO stands for Liberian and American Mining Company.

14:42:52 15 Q. Now, you said he told you that the Gio people had attacked
16 Charles Julu's residence. Please continue from there.

17 A. Yes. My chief colonel, Alfred Zeh, was a nephew to Samuel
18 Kanyon Doe, so when I went there that was what they told me.

19 They said, "You, MP, join that group." He said, "You the Gio
14:43:21 20 people have attacked the PPF director's residence in - at LAMCO,
21 Yekepa, and have killed a lot of his children. So you will never
22 continue with you the Gio people, so you have to report back to
23 your mother unit at the BTC." So we left and it was an order, so
24 we proceeded to the headquarters. And we were assigned --

14:43:59 25 THE INTERPRETER: Your Honours, the last word again was not
26 clear to the --

27 PRESIDING JUDGE: You said you were assigned to where?

28 THE WITNESS: Back to the headquarters. Back to the MP
29 headquarters for normal duties. And two days after, whilst we

1 were there and even before the two days, there was a unit in a
2 truck loaded moving towards Nimba. And when they got there,
3 there was a complete war. They started killing people. They
4 started killing. Those were the Krahn soldiers.

14:44:46

5 MR CHEKERA:

6 Q. And what - which people were they killing, the Krahn
7 soldiers?

14:45:03

8 A. The Nimbadians, the Gio and the Mano. They said, "You
9 killed our people, we will also kill you." And Charles Julu
10 himself led the troops and they started killing people. They
11 killed one of the kinsman who was the only geologist from the
12 Nimbadian side that was working with the company. One DK
13 Wonsel ea. He was a Gio man.

14 Q. Did you say one kinsman or one kinsmen?

14:45:35

15 A. One kinsman. One of our own people from Nimba County.

16 Q. Yes, please continue. You were telling us about - let's
17 just go back to the place in the transcript where you were
18 telling us about the killing of the kinsman who was the only
19 geologist because there is a word that's written on our

14:46:05

20 transcript that doesn't look like what you said. Let's just go
21 back there and please explain again. They killed one of your
22 kinsman who was a geologist. Please continue from there and go
23 slowly, if you may.

24 PRESIDING JUDGE: The witness said a geologist from the
14:46:25 25 Nimbadian side.

26 MR CHEKERA: Thank you, Madam President. It's something
27 completely different on the transcript and I will not repeat it:

28 Q. They killed one of your kinsmen who was the only geologist.
29 Please continue from there.

1 A. Yes. He was called DK Wonsel ea, and they arrested so many
2 others.

3 Q. Help us with the spelling of DK Wonsel ea, the second name
4 Wonsel ea.

14:47:09 5 A. W-O-N-S-E-L-E-A.

6 Q. Thank you. Please continue with your narrative.

7 A. And they arrested a lot of people, along with 300 Ni mba
8 children from 7 years old down to babies. They put them in a
9 truck, and at that time we were in Monrovia. We were the

14:48:02 10 Monrovia group. They brought them to town and they took them to
11 Scheffl ein.

12 Q. Yes. What happened in Scheffl ein?

13 A. They killed them and dumped them in a hole.

14 Q. All the 300 children?

14:48:27 15 A. Yes. Yes. And they said, "We killed their children, they
16 we kill ours too." And it was 50/50. And some other older
17 people who were arrested, they were taken to the BTC, the
18 military highest confinement area, Post Stockade at the BTC and
19 that included Colonel Samuel Varney, Yarsuo Dorl ea, Edward Mi neh.

14:49:10 20 Q. I'm going to ask you to, if you may, spell the name
21 immediately after you say it. Let's start with Yarsuo Dorl ea.
22 We already have the spelling of Edward Mi neh. How do you spell
23 Yarsuo Dorl ea?

24 A. The same DK Wonsel ea, we used to call him Yarsuo Dorl ea,
14:49:37 25 but that was the same DK Wonsel ea.

26 Q. And how do you spell Yarsuo, if you may?

27 A. I'm unable to spell that one. But it was the same DK
28 Wonsel ea.

29 MR CHEKERA: Madam President, I will just attempt Yarsuo

1 and spell it Y-A-R-S-U:

2 Q. The third name you mentioned was Edward. Did you say
3 Edward Mineh?

4 A. Edward Mineh and General Varney.

14:50:20 5 Q. Yes. And what happened to these gentlemen?

6 A. They were later released.

7 Q. Who were these people, the three that you have mentioned?
8 Did they belong to any particular group? Were they a member of
9 any organization?

14:50:41 10 A. Yes. Colonel Samuel Varney was in the AFL. He was a Nimba
11 citizen. DK Wonslea was a Nimba citizen. Edward Mineh was a
12 Nimba citizen assigned in Sanniquelle with the AFL. Those were
13 few of the people that they brought to jail.

14 Q. Do you know why they were arrested?

14:51:12 15 A. There was no reason. It was simply because they were
16 Nimbadians. They said Nimba citizens killed their children in
17 Yekepa, so they have to revenge. There was no reason.

18 Q. So these arrests and the killings, is this what you
19 referred to as the Nimba raid?

14:51:34 20 A. Yes. The incident is well-known in Liberia as the Nimba
21 raid. Just when you say the Nimba raid, people's minds will
22 reflect on that incident at that time, 1983.

23 Q. And if you recall, we were discussing the 1985 coup. How
24 does this Nimba raid relate to the coup in 1985?

14:52:09 25 A. At that time Quiwonkpa had left the country when the Nimba
26 raid occurred and that was where the tribalism started. Tension
27 started mounting between the Gio and the Krahn.

28 Q. Do you know where Quiwonkpa went to when he left the
29 country?

1 A. I don't know where Quiwonkpa went to.

2 JUDGE DOHERTY: Mr Chekera, before you leave it, I'm quite
3 sure that I heard the witness say the incident is well-known in
4 Liberia, and that's my note, and it's recorded "as in Sierra
14:52:52 5 Leone".

6 MR CHEKERA: Thank you for the observation. I had heard
7 Liberia. I may just clarify:

8 Q. Did you say the incident, the Nimba raid, is well-known in
9 Liberia or did you say in Sierra Leone?

14:53:06 10 A. I am talking about my country, Liberia, the Nimba raid.
11 Every citizen in Liberia, if you ask them about what is called
12 the Nimba raid, they will tell you that the incident took place
13 at LAMCO. I am talking about Liberia.

14 Q. Now, you've told us about how Quiwonkpa left the country
14:53:28 15 after the Nimba raid and went into exile. Quiwonkpa did come
16 back. When did he come back?

17 A. Okay. Quiwonkpa had left and we all returned to normal
18 duties. And unexpectedly, 5 o'clock one morning we heard a heavy
19 sound of artillery shell, heavy bombardment, and that covered the
14:54:07 20 whole of Monrovia. And at that time we were only using one
21 station, the FM 89.9. That was the only station.

22 Q. Just pause there. Let's just have the time frame. You've
23 mentioned the time. You are very specific on the time,
24 5 o'clock. During the day, the month and the year, or either of
14:54:26 25 those?

26 A. Yes.

27 Q. [Microphone not activated] of what day of the month of what
28 year, if you remember? If not, just tell us what you remember.

29 A. 5 o'clock, 12 November 1985.

1 Q. Yes. Please tell us what happened at 5 o'clock on that
2 date.

3 A. After the artillery shelling and the bombardment, and at
4 that time there was only one station in Liberia called the
14:55:06 5 FM 89.9. We heard over the radio that, "Speaking to you now is
6 Thomas G Quiwonkpa. Thomas G Quiwonkpa. I have entered with my
7 men. I do not want any bloodshed. All AFL personnel should
8 remain their respective areas. My men I brought in do not know
9 you. There is no escape route for Samuel Kanyon Doe. I am in
14:55:42 10 complete control of the country. That was the announcement.

11 Q. And did you do anything following the announcement?

12 A. And from there we saw that the whole of Liberia burst out
13 into jubilation, and then I watched as my charge's quarter at the
14 BTC, there was entrance controlled by the Military Police into
14:56:24 15 the brigade --

16 Q. Sorry. You were at your what? We didn't get what you said
17 you were. You said you were at your something quarter?

18 A. I was at my charge of quarters, the MP headquarters at the
19 BTC, where if you entered, the first headquarters, you will meet
14:56:46 20 the information booth, that is where the Military Police are
21 assigned. And by then the gate was widely open. And it is at
22 the BTC where you have the commanding general's office. When we
23 went, we saw Quiwonkpa on top of a Mohawk that entered into the
24 BTC. And all of our commanders who were supposed to be giving
14:57:12 25 orders, every one of them started jubilating, embracing him, and
26 people were climbing on top of the Mohawk and telling him, "You
27 are welcome. You are welcome. We miss you. We miss you."

28 Q. What is a Mohawk?

29 A. It is a war tank. A Mohawk is a war tank. In common terms

1 we call it Mohawk.

2 Q. Please continue.

3 A. On top of a war tank. So, you know, he said he had now

4 entered. So our commanders from whom we were supposed to take

14:57:50 5 orders to either fire guns or to do any other thing, all of them

6 started crying over the man and all of us - all of them went to

7 the brigade headquarters and Qui wonkpa asked where is the

8 commanding general in charge. Morris T Zehzeh [phon] was the

9 commanding general in charge. Morris T Zehzeh had been the

14:58:19 10 deputy commanding general to Qui wonkpa and when Qui wonkpa left he

11 took over. And the commanding general ran away when he saw

12 Qui wonkpa coming. Instead of staying to take orders, he ran

13 away. When Qui wonkpa entered there all of us followed him and

14 Cooper - he said, "Cooper Teah, you stay here as acting

14:58:46 15 commanding general with your men." And then he got on top of the

16 Mohawk and he moved to Post Stockade and he asked, "Where is the

17 Post Stockade commander?" He said, "Is there any soldier in

18 jail?" They burst into the cells and freed the soldier prisoners

19 and he asked every one of them to remain calm and stay in the

14:59:11 20 barracks and he said, "You shouldn't get into the streets because

21 you don't know the men I brought with me and they too do not know

22 you, so I don't want anyone" --

23 THE INTERPRETER: Your Honours, could the witness be asked

24 to slow down and repeat from where I stopped.

14:59:28 25 PRESIDING JUDGE: Mr Witness, you are running again with

26 your testimony. Please slow down. Now you have to repeat your

27 answer where you said he told the prisoners who were released

28 from Stockade to stay off the street because his men didn't know

29 them. Now continue from there.

1 MR CHEKERA: Sorry, Madam President, before he continues:

2 Q. Did you say Quiwonkpa was told to act as commanding general
3 or did you say another name?

4 A. When Quiwonkpa got to the barracks he asked for the
15:00:09 5 commanding general and they said the commanding general had run
6 away.

7 Q. Who did he appoint to act as commanding general? That was
8 my question.

9 A. He appointed Cooper Teah who came with him. Cooper Teah.
15:00:29 10 He was in the army before. Cooper Teah came with him to the
11 barracks.

12 Q. Teah is spelt T-E-A-H?

13 A. Yes. T-E-A-H.

14 Q. Yes, please continue from where Madam President had
15:00:49 15 directed you to continue from. Sorry for the interruption.

16 A. When they broke open the Post Stockade cells and set
17 everybody free he said every one of them should go back to their
18 respective places in the barracks and relax. He said he did not
19 want any soldiers to get to the streets. He said, "The men I
15:01:20 20 brought with me do not know you and you too do not know them and
21 I do not want any bloodshed. You should remain calm." From
22 there he got on top of his Mohawk again and proceeded to an
23 unknown destination.

24 So all of us in the soldiers including our commanders, we
15:01:40 25 were all jubilating. We were all happy for his return. We left
26 and went to the MP headquarters. Whilst we were sitting down at
27 the MP headquarters there was a land phone. There was one land
28 phone on the desk, on the MP's desk. The phone rang and when the
29 phone rang, our Military Police commander at that time Colonel

1 Bingo from Lofa - Colonel Joseph Bingo from Lofa, he came outside
2 and when the telephone started ringing all of us who were there
3 were afraid to touch the telephone and Colonel Bingo went and
4 picked up the telephone and answered and he said yes. He said,
15:02:36 5 "Who am I speaking with?" And then Samuel Kanyon Doe called his
6 name and he said, "I am the President. I am talking to you
7 Colonel Bingo, MP commander." He said, "Which of the
8 Presidents?" And Doe said, "What do you mean by that?" And he
9 said, "Yes, sir." He said, "Quiwonkpa is in the country. He
15:03:04 10 announced that he is here. And tell me who is the President
11 talking?" He said, "I, Samuel Kanyon Doe." He said,
12 "I want you to move the troops now to the brigade headquarters."

13 And at that time before Quiwonkpa could even come to the
14 barracks, most of the PRC members who were there with Doe at that
15:03:39 15 time were arrested and they were confined at the Post Stockade.
16 All of his cabinet members - all of Doe's cabinet members were
17 arrested and locked up in Post Stockade. And Quiwonkpa said he
18 did not want any of Doe's people executed. He did not want any
19 bloodshed. So at that time people were still bringing in
15:04:02 20 prisoners - prisoners to the Post Stockade.

21 And then the MP commander told Doe that, "You see - you
22 said I should move the troops to the brigade headquarters to
23 arrest the people. How could I go? I am not armed. I am not
24 armed. How do I get there? And these men, they are well armed.
15:04:32 25 They have artillery pieces, RPGs, rocket propelled grenades,
26 grenade launchers, GMGs, calibres. They have all the heavy
27 weapons and how do I get there to these people?"

28 And it was right away that the phone cut off. And then the
29 MP commander told us, he said, "Look, something is happening."

1 He said, "Doe is in power. Doe is static. Doe gave me orders to
2 conduct arrests. I cannot endanger the lives of you people now,
3 so you sit down. You stop dancing. Sit down." And all of us
4 sat down.

15:05:22 5 And in less than three hours the 1st Battalion that was
6 loyal to Samuel Kanyon Doe headed by Colonel Wright, Moses
7 Wright, he was a Krahn man - we did not know how Doe got to
8 Schefflein I mean - and from Monrovia to Schefflein is a long
9 distance. How did Doe get there? The troops moved to the FM
10 where Quiwonkpa and Prince Johnson's men were.

11 Q. Just pause there. Which troops moved to the FM?

12 A. The 1st Battalion from Schefflein.

13 Q. And those were government forces?

14 A. Yes. That unit was a prepared unit on stand-by for the
15:06:41 15 protection of the President. They were all Krahn men. The
16 battalion commander himself was a Krahn man. They were all Doe
17 people, the 1st Battalion.

18 Q. And the place where they went to FM, what was that place
19 FM?

15:06:54 20 A. The FM station. It's close to the ELWA Junction. It's not
21 much distance from the ELWA Junction. That was the only station
22 operational at that time in Liberia.

23 Q. And is that in Monrovia?

24 A. Yes, it is in Monrovia close to the ELWA Junction.

15:07:22 25 Q. Okay. Please continue from where the troops moved to the
26 FM radio - to the FM station. Sorry, maybe let me just clarify.
27 FM station, what station is it?

28 A. That was the only Liberian broadcasting station.

29 Q. Now, please continue. And you said that was where

1 Quiwonkpa was and you mentioned - did you say Prince Johnson?

2 A. Yes.

3 Q. Yes. Please continue from where you were telling us about
4 when the troops moved to the radio station FM?

15:08:07 5 A. When the troops moved there, we were still at the BTC. We
6 were at the BTC. We the MPs knew about the communication, but
7 the other soldiers did not know about the state of the issue and
8 they were still conducting arrests. So we were at BTC. When the
9 troops moved from Schefflein they passed through the Zena Hill.

15:08:35 10 There is a hill at the back of the station by the side of the
11 Samuel Kanyon Doe Sports Complex and they launched an attack at
12 them and at that time Quiwonkpa was at the radio station. Prince
13 Johnson too was there. They got there. They dislodged them.

14 Q. The name of the hill again? You mentioned a hill. What's
15:08:59 15 the name of the hill?

16 A. The hill is called Zena Hill. There is a high hill called
17 the Zena Hill close to the radio station.

18 Q. Do you know how to spell Zena?

19 A. Z-E-N-A.

15:09:22 20 Q. Please continue with your narrative.

21 A. And the people moved in there, they disorganised them and
22 they took a cassette that was recorded by Doe at Schefflein and
23 they slotted in the cassette and the cassette was playing.

24 Q. [Microphone not activated] it would be easier when you
15:09:45 25 refer to your particular group to refer to them by name rather
26 than to say "the people" if you can. You said the people moved
27 there and they dislodged them. Who moved there and dislodged
28 who? If you could say who moved over and dislodged who. If you
29 could just start again and say so and so moved and dislodged so

1 and so and continue, please.

2 A. The loyal troops from the 1st Battalion moved to the radio
3 station and they dislodged Quiwonkpa and his men from the radio
4 station. And there was a cassette that Doe had recorded at

15:10:29 5 Schefflein. They went there and they played that cassette and
6 that provided maximum security and they deployed heavy troops at
7 the radio station and they announced over the air and he said, "I
8 am Samuel Kanyon Doe. I am still in power. There is no escape
9 route for any rebel." And he said Quiwonkpa, who said - he said,

15:11:00 10 "Quiwonkpa's coup has failed." He said, "I am Samuel Kanyon Doe,
11 President of Liberia." And he said, "Every Liberian citizen who
12 knows or who is aware of the rebels, you should kill them, you
13 should bring their bodies and we will put them - you should
14 report them to us and if you kept them under cover and they were
15:11:27 15 discovered by us, you too will be treated like a rebel."

16 And they started playing the national anthem of Liberia and
17 right up there the situation changed and we were still sitting at
18 the MP headquarters when we saw a group of SATU. SATU was the
19 special bodyguard unit assigned with the President at that time,
15:12:00 20 the SATU troops who were trained at Camp Israel. They saw the
21 SATU troops. They came in with trucks straight to the Post
22 Stockade where all the cabinet ministers had been confined for
23 the ministers of the PRC government. They went there, they broke
24 open the cells, they brought the prisoners outside.

15:12:28 25 THE INTERPRETER: Your Honours, could the witness be asked
26 again to slow down and repeat from where he stopped.

27 PRESIDING JUDGE: Mr Witness, please slow down again. You
28 are running.

29 THE WITNESS: Sorry.

1 PRESIDING JUDGE: You said at Post Stockade they broke the
2 prison cells open and brought the prisoners outside. Continue
3 from there slowly.

4 THE WITNESS: They went and broke the prisons open. They
15:12:54 5 took all the prisoners who had been confined by Quiwonkpa, his
6 National Patriotic Front - the national patriotic forces, rather,
7 and they took the prisoners to the President. And they were
8 released by the President and he gave them orders that the chief
9 of staff of the Armed Forces of Liberia, General Henry S Dubar,
15:13:32 10 was arrested by Quiwonkpa himself in BTC in our presence.

11 MR CHEKERA:

12 Q. Do you know how to spell Dubar?

13 A. D-U-B-A-R, Dubar.

14 Q. Yes. Please continue.

15:13:54 15 A. Doe again empowered them and gave them orders. And when
16 the chief of staff got back to town and went to his defence
17 office, the Krahn guys started reporting to the chief of staff
18 and he started giving orders. Whilst we were at the BTC, we saw
19 a Death Squad coming from the mansion and it was headed by
15:14:27 20 Captain Tai ley.

21 PRESIDING JUDGE: Mr Witness, you said something that
22 doesn't appear to make sense. You said, "The prisoners were
23 released by the President himself. He gave order that the chief
24 of staff of the Armed Forces of Liberia, General Henry S Dubar,"
15:14:55 25 and then what happened after that? What were the orders?

26 THE WITNESS: The order that was given to the chief of
27 staff was that, "You are the chief of staff of the army. You
28 will go and arrest every rebel forces that came in and every
29 supporter of Quiwonkpa. Anybody that you hear that was

1 jubilating in favour of Quiwonkpa, those are declared enemies,"
2 and that was the order. The order was passed to the soldiers.
3 And whilst at the BTC, there was a fellow called Captain Tailey.
4 He was the Death Squad leader for Samuel Kanyon Doe at the
15:16:05 5 mansion. Captain Tailey --

6 MR CHEKERA:

7 Q. Just pause there a minute. Captain Tailey, I think the
8 spelling is T-A-I-L-E-Y.

9 A. Yes.

15:16:21 10 Q. You said he was leader of the Death Squad. What Death
11 Squad are you talking about?

12 A. I am talking about Samuel Kanyon Doe's Death Squad.
13 Captain Tailey was a Krahn man. He worked and came to the
14 barracks with two pick-ups.

15:16:43 15 Q. The Death Squad that you are talking about, were they
16 officers of any organisation in the government of Samuel Doe?

17 A. They were AFL personnel, AFL personnel assigned at the
18 Executive Mansion from the SATU unit. The SATU unit. They came
19 to the barracks and they went straight to the MP headquarters and
15:17:20 20 they asked, "Where is Colonel Bingo? Where is Colonel Bingo?

21 Won't anybody talk?" And the first man who stood up to talk, he
22 was shot straight from his head up into his leg and he was killed
23 from all sides by an automatic by one Sergeant Bati [phon], a Gio
24 boy. And they asked, "Why did you delay to talk? All of you
15:17:59 25 here have been declared rebels. Your commander too is a rebel
26 because he refused to execute an order from the President."

27 Q. Sorry, just pause there a minute. We just want to
28 understand. When you say he was shot straight from his head up
29 to his leg, can you describe how the officer was shot again?

1 Describe for us how he was shot.

2 A. Yes. The man opened an AK-47 automatic rifle at the man
3 and he killed him straight down. That is what I refer to as
4 spray. He killed him on site with an automatic. And they broke
15:18:47 5 the windows open and they jumped into the office of Colonel
6 Bingo, the commander. He was a Gissi man. They took him away
7 and they killed him. And straight from there, we were like
8 chickens in a basket. When you kill the mother, there is nowhere
9 to go. We never had any commander again. So we were just - all
15:19:13 10 of us were just sitting at the side of the MP headquarters
11 because we knew any one of us would die at any time. And they
12 caught Captain Man Tonah and killed him. They killed the police
13 depot commander that was assigned at the MP headquarters. There
14 was a national police depot at --

15:19:37 15 Q. Again, if - when you mention a name, if you could either
16 give us a chance to spell the name or help us with the spelling.

17 THE INTERPRETER: Your Honours, the interpreter with like
18 to make correction. It was Colonel Bati who was killed. Colonel
19 Bati. There is somewhere - it goes the opposite. The
15:19:58 20 interpreter said it in the opposite form. But actually it was
21 Colonel Bati who was killed.

22 PRESIDING JUDGE: I heard of a captain somebody.

23 THE INTERPRETER: Your Honours, rightly so, a Captain Bati
24 was killed.

15:20:20 25 MR CHEKERA: Yes, I heard a captain Tonah. Maybe, Madam
26 President, I could just ask the question.

27 THE WITNESS: No. No.

28 PRESIDING JUDGE: Let there be some order. Mr Chekera,
29 could you clarify what the witness said.

1 MR CHEKERA: Yes:

2 Q. Mr Zaymay, who was killed by who? Just give us the names
3 of who was killed and who killed that person.

4 A. The same Death Squad that was headed by Tailey who came to
15:20:56 5 the MP headquarters arrested Captain Man Tonah, a Gi o man.

6 Q. Could we have the spelling of Captain Man Tonah?

7 A. M-A-N, T-O-N-A-H.

8 Q. Yes. Please continue from there.

9 A. And from there, there was one other police officer whose
15:21:47 10 name I've forgotten now - oh, yes. There was one Major Toweh, a
11 police officer. T-O-W-E-H. One Major Toweh, he was the depot
12 commander. The MP headquarters had a police section there that
13 treated the civilians. And there was a depot there and he was
14 the depot commander, Major Toweh, a Gi o man. He was also taken
15:22:28 15 away by this same captain, Man Tonah - no, I mean,

16 Captain Tailey, and he executed them. From there --

17 Q. Sorry. Again, who executed who?

18 A. The Death Squad commander, when he came, those were the
19 people he arrested and he took them along with him and executed
15:22:58 20 them right at the football field at BTC.

21 Q. And you are referring to Major Toweh as one of the people
22 who was executed?

23 A. Yes, sir. Yes, sir, Major Toweh - we call him Major Toweh
24 - he was the depot commander assigned at the MP headquarters and
15:23:22 25 he was the police depot commander assigned at the MP
26 headquarters. He was a Gi o man from Ni mba County.

27 Q. And why was - why were - these two people that you have
28 mentioned, why were they executed?

29 A. Who and who?

1 Q. Captain Toweh and the --

2 A. Captain Toweh?

3 Q. Yes.

4 A. Yes, because they were Nimbadians. They were Gio. They

15:23:59 5 said all of them were rebels and the MP commander refused the
6 President's orders. And when they were killed, they will just
7 throw your body away and they walked away. There was nobody to
8 ask. So from there they left and they went. And at that time
9 the commanding general was - I will get the general's name later.

15:24:38 10 There was another commanding general in charge.

11 Q. Which forces? Commanding general of what forces?

12 A. Of the AFL.

13 Q. Yes. Please continue.

14 A. Okay. I will call the name. So at that time at any time

15:25:02 15 the commanding general said, "Look, if I call for formation, you
16 guys are soldiers, you should stay in the barracks. The Krahn
17 guys should not have gone into disarray into the streets. They
18 are killing people. So if anyone of you went out and if you met
19 with your own death, that is your business. I am the commanding

15:25:25 20 general. I'm saying everybody should stay here. Nobody should
21 go anywhere." And that did not suffice. When the commanding
22 general spoke, he went back to his office. And in the evening,
23 about 10, 11 at night, the same squad headed by Captain Tailey,
24 they will just come in their jeeps and they stopped the cars,
15:25:53 25 they will get down from the cars and they will start looking
26 around.

27 You know, when we joined the army - when I joined the army,
28 many guys from Grand Gedeh, I joined together with them. So when
29 those guys got there, they knew exactly who was Gio and who was

1 Mano. And when they got down they will just look around and they
2 will just grab people like chickens, send them into the cars,
3 into the pick-ups, and then they will move with a group. And
4 before you could know, then you will just see a "pow, pow, pow"
15:26:21 5 and kill people. And the commanding general too became angry and
6 he went to the President straightaway.

7 He told Samuel Kanyon Doe that, "You should advise" - that,
8 "You should get advice from Harrison Penaud." Harrison Penaud
9 was Doe's brother. He is one of the PRC men. He was one of the
10 "I don't care" men in the government. Everybody knew that.

11 Everybody knew about Harrison Penaud's behaviours. So he said,
12 "You should advise your Harrison Penaud. I am the commanding
13 general of the army. It is not everybody here in the army that
14 are rebels. These guys were on duty under my command when the
15:27:17 15 rebels invaded this country. And should we declare everybody
16 enemy, who would we command?" He said, "Harrison Penaud and his
17 Tailey are constantly going to invade my brigade, arrest my
18 soldiers and execute them over and again." So he said, "I will
19 not like this, and if you don't want me to continue serving as
15:27:47 20 your commanding general, you should tell me that and I will
21 resign."

22 Doe sent for Penaud and that was on the TV. Everybody saw
23 it on the TV. And he said, "Penaud, you --

24 THE INTERPRETER: Your Honours, the word was not very clear
15:28:15 25 to the interpreter.

26 PRESIDING JUDGE: Pause. Please pause, Mr Witness. Now,
27 you are describing what everybody saw on TV. Please repeat what
28 people saw on TV.

29 THE WITNESS: Samuel Kanyon Doe, the President at that

1 time, was advising Harrison Penaud and he said, "You, Harrison
2 Penaud, this should be the end of it." And we saw Penaud get on
3 to his knees and he said, "Yes, sir." And he said, "The
4 commanding general has given you a complaint on several
15:28:57 5 occasions." And he said, "You have been doing things that are
6 not good and now I have given the commanding general the order
7 that next time you go there they should arrest you and the
8 commanding general is capable of arresting you. You just leave
9 here, you go there to the camp with 10, 15 men and the commanding
15:29:13 10 general controls the whole brigade. And in case he commanded men
11 to get at you, will you be able to shoot at them all?" And he
12 said, "Yes, sir." And at that time he used to come to the
13 barracks and after the advice he no longer came to the barracks.
14 He will now stay outside the barracks and send Tailey and his men
15:29:40 15 and they will grab people and take them away.

16 But we stayed on until I think it was about after three
17 days when they announced over the radio that Thomas G Quiwonkpa
18 had been captured and killed by Edward Slinger. So all soldiers
19 should parade to the barracks to the commanding general's office
15:30:15 20 and he said they were bringing the body there.

21 MR CHEKERA:

22 Q. The name again of the man who they said had killed
23 Quiwonkpa? You said there was an announcement that Quiwonkpa had
24 been captured and killed by Edward. The second name, we didn't
15:30:32 25 catch it.

26 A. By Edward Slinger, S-L-I-N-G-E-R. And he said in fact
27 those bodies were now at the mansion. So we said, "Oh, God,
28 thank you. The man who brought his problem into this country has
29 been captured and killed," so we hoped that the problem was to an

1 end and that there will be total peace for us. We did not know
2 that it was a lie and that in fact that was now going to be the
3 worst time than even before.

4 So we paraded to the commanding general's office at the
15:31:27 5 BTC. All units. And when we went and watched, we saw a pick-up
6 coming in with a lot of men on board and they were jubilating.
7 And they stopped by with the muzzle of the arms and they got down
8 and they took the body from the car and they threw the body down.

9 I knew Quiwonkpa. He trained me in '79. He was the staff
15:32:02 10 sergeant and he was the one that they killed. He was wearing a
11 jeans trousers with an African shirt. They drove the body all
12 over the place on the tarmac road and he was cut into pieces and
13 he was beheaded and the head was thrown to all the soldiers and
14 they told them that, "This was your commanding general that you
15:32:38 15 were jubilating for. So now you have to use it to play football
16 today." And when they threw the head over to you, you needed to
17 kick it. If you refused doing so you'll be shot at. And they
18 even killed nine soldiers on that scene for refusing to kick the
19 head as a football. And from there --

15:33:03 20 Q. Sorry. The soldiers that were being asked to kick the
21 head, did they belong to any particular ethnic group?

22 A. No, they were generally soldiers who were assigned under
23 the brigade. And the brigade was the office of the commanding
24 general. Those were soldiers who were assigned under the brigade
15:33:32 25 and who lived on the barracks. Because the rebels entered to the
26 barracks and all soldiers at the barracks jubilated and they
27 welcomed Quiwonkpa. So for that reason they said those of us who
28 were on the barracks were for Quiwonkpa and they said we should
29 kick our football. That was what they said. So from there the

1 man was cut into pieces and they ate him raw. There was no
2 pieces of it left on the ground. And from there they left.

3 Q. Who cut the body into pieces and ate it all? Who cut the
4 body into pieces and who ate the body, or the pieces?

15:34:23 5 A. The Krahn people who were loyal to Samuel Kanyon Doe, the
6 ones who came in with the body. I knew one of the commanders,
7 Colonel Manjay, who was the commander for the arsenal unit. I
8 saw him.

9 Q. Colonel who? Did you say Manjay?

15:34:52 10 A. Colonel Alfred Manjay.

11 Q. Are you able to help us with the spelling of the second
12 name?

13 A. M-A-N-J-A-Y.

14 Q. Okay. Yes, you were telling us about how Quiwonkpa's body
15:35:26 15 was cut into pieces and eaten by soldiers of the Krahn tribe.
16 Please continue.

17 A. And then from there they moved and whilst they were moving
18 out of the gate they arrested five soldiers and threw them into
19 the pick-up. Amongst those, none survived. They left and went.
15:35:53 20 And thinking that we, the AFL who were at the barracks, we were
21 now free, because the man who had invaded the country had been
22 killed, and thinking that the trouble was now over, normalcy
23 would return for all of us, and we did not know that it was going
24 to be worse than before and that was going to lead people to go
15:36:23 25 into exile.

26 And from there even those who were loyal to Samuel Kanyon
27 Doe - even those who were loyal to Samuel Kanyon Doe in the army,
28 by then the entire Nimba citizenry was declared enemies and even
29 some of those who were renting - letting people's houses in town,

1 they started pushing them out of their houses because they said
2 they did not want them to be killed and they said if you - they
3 were telling them, "If you are from Nimba you should go back to
4 your country, because we did not want our children to be killed."

15:37:12 5 Even some of the women who were cooking rice and selling
6 for their survival and who were from Nimba, all of them were
7 declared enemies so they were being pushed out of houses. It was
8 not easy for the Nimbadians. Everybody knew that in Liberia.
9 And especially for those of us who were in the army, it was not
10 easy. Only the strongest survived.

11 So because I went to school in Careysburg from '79 to '59
12 before I joined the army, so my family was at Careysburg and it
13 was about a 12 kilometres distance off Monrovia and my wife too
14 was from there. When I escaped it was at Careysburg that I went
15:38:15 15 to and when I went to Careysburg I was in hiding. And after most
16 of the tension, it was from there that Samuel Kanyon Doe
17 introduced complete tribalism in the army. If you were not
18 Krahn, you will not be admitted in fact into the army. And even
19 the Gio tribes were reduced in the army. And when I went to the
15:38:53 20 barracks they said there was a double pay and per diem for all
21 soldiers in the barracks and they said all soldiers should report
22 to their commanders for their salaries.

23 Q. You said there was double pay and what when you went to the
24 barracks?

15:39:07 25 A. No, I was in hiding in Careysburg.

26 PRESIDING JUDGE: You said, Mr Witness, that there was
27 double pay. Did you say and per diem? There was double pay and
28 per diem when you went to the barracks, is that what you said?

29 THE WITNESS: No. I repeat, I said when I escaped I was in

1 hiding at Careysburg and at that time the government designed a
2 strategy to arrest more Gio people. So they brought up a plan in
3 which they said there is going to be a double pay and a per diem
4 for the November 12, 1985 operation added to the double pay and
15:39:58 5 they asked that all soldiers report to their mother unit and to
6 their commanders for pay.

7 MR CHEKERA:

8 Q. There was going to be a double pay and per diem for the
9 November 12, 1985 operation. What was the November 12, 1985
15:40:24 10 operation for which there was going to be a double pay and per
11 diem?

12 A. The Qui wonkpa invasion. Qui wonkpa had been killed. So the
13 AFL were loyal to the government and they said there will be a
14 per diem that will be added to their salaries and they said
15:40:46 15 everybody should report to their mother units to their commanders
16 and for the payment. That was for the soldiers.

17 Q. And did you go to collect payment?

18 A. No. At that time I was in hiding at Careysburg, so I took
19 my ID card and I gave it to my wife to go and get my salary.

15:41:15 20 When the woman went they arrested her and they kept her for 72
21 hours, three days, and they told her that she knew my location
22 and that if she did not show where I was, she will be confined
23 for a lifetime in prison and she will be charged for aiding a
24 rebel. And he said they knew her husband to be T Zaymay and he
15:41:47 25 hailed from Nimba County and my wife said, "Oh, my husband and I
26 divorced ever since. It is only sometimes at the end of the
27 month that he gives me some money to feed the children." And she
28 said, "I do not even know the location of T Zaymay at this time."
29 And luckily her brother was also a captain - was also a

1 Lieutenant in the army he was called Francis Yassieh.

2 Q. Can you spell Yassieh?

3 A. Y-I-S-S-A-E-H.

4 Q. Thank you.

15:42:39 5 A. He was a Mende boy. Not a Gio, a Mende. So, you know, the
6 other tribes were free in the army and Francis too was assigned
7 with one of the ministers. So Francis was free in the army. And
8 when Francis heard that his sister had - my wife had been
9 arrested, Francis went there. And then - and Francis and my
15:43:22 10 wife, they spoke their ethnic - their tribe, Mende. They spoke
11 it to each other. And then Francis said, "Oh, why did you arrest
12 my wife - no, I mean my sister?" My sister and her husband had
13 divorced ever since.

14 There was a case between the two of them about the support
15:43:48 15 for the children in the presence of the late Colonel Bingo, the
16 MP commander. And that only the wife should report to Colonel
17 Bingo for the children's support. And that she and T Zaymay are
18 no longer together and that I can prove that. Because Yassieh
19 too was an MP, and at that time another man had taken over as the
15:44:31 20 MP commander. He was a Krahn man. He was called Captain Amos
21 Garlo. He was the MP commander, a Krahn man, at that time.

22 Q. Sorry, again, the name of Captain Amos Garlo.

23 A. G-A-R-L-O, Garlo.

24 Q. Yes. Thank you.

15:44:57 25 A. So Amos Garlo at that time was not MP commander. But when
26 they came, when Krahn people took over and the MP commander had
27 been killed, when they came, he took over as MP commander. So
28 God could have it first clearly that Amos Garlo did not know the
29 story that my wife and her brother were talking about and he did

1 not know the story.

2 PRESIDING JUDGE: Mr Witness, you must slow down. Okay?
3 Otherwise the interpreter just can't keep up with you and we
4 can't understand what you are saying.

15:45:36 5 THE WITNESS: Yes, sir.

6 PRESIDING JUDGE: So please repeat - you've just told us
7 about this Captain Amos Garlo and you said he took over as MP
8 commander. Now, continue your story from there.

9 THE WITNESS: Yes. Captain Amos Garlo was assigned before
10 as the - at the Post Stockade, the prison compound, at the BTC.
11 Colonel Bingo was our MP commander. And when Colonel Bingo was
12 killed on the spot, and because Amos Garlo was a Krahn man, he
13 moved. He moved straight to the MP headquarters and took over as
14 the MP commander and he now remained. So the topic that my wife
15 and her brother Yassieh were discussing about the divorce between
16 my wife and I and that the case had gone before the MP commander,
17 Amos Garlo was convinced because by then he was not in command
18 and he did not know the story. And being that Yassieh was a
19 different tribe, and he was also a Military Police personnel,
15:46:46 20 when Yassieh explained, he believed it.
15:47:18 21

22 So they said, "Okay, what we're going to do, we'll not just
23 release you. We will see what you can do tomorrow." And then
24 Yassieh, my brother-in-law, he got into his car and he drove
25 straight to Careysburg where I was, at his aunt's residence where
15:47:53 26 I was. And when he got there he said, "Old mom, where is T
27 Zaymay?" Because he was a soldier well dressed, so the people
28 were afraid to tell him my location. And they said, "No." He
29 said, "No, T Zaymay is my friend. Massa, his wife, is in jail at
the MP headquarters."

1 And so when I came and he told - he told my mom that "If
2 T Zaymay is here, I want it talk to him." It was not easy for
3 the mother to turn me over to them. She swore and she later
4 showed where I was. They came there and he told me, he said,
15:48:45 5 "Oh, man, you are blessed by God. Even my sister has been
6 arrested and I knew they were going to come here with MPs
7 together with her, and if they saw you here they were going to
8 arrest you. So I want you leave this place." And I moved from
9 there. I said, "Okay. No problem."

15:49:09 10 And then I said, "But what happened with the salary issue?"
11 And they said it was no salary issue. It was an idea designed by
12 the government. And they said, "In fact, many of your brothers
13 were arrested. They were arrested. So I am going back. I have
14 to be on duty tonight. You have to leave this place and go
15:49:37 15 further into the bush." And I said, "Okay." And then I left.

16 MR CHEKERA:

17 Q. Those who were arrested, those who he referred to as your
18 brothers, who were your brothers that had been arrested that he
19 was referring to?

15:49:52 20 A. He was talking about the citizens from Ni mba County. He
21 said it was an idea only designed to arrest the Nimbadians,
22 because we had been already declared rebels. And those who did
23 not have much idea and who would appear to collect those pays
24 they spoke about were going to be arrested and they will be
15:50:22 25 treated as the rebels they referred to. So I left that place.

26 Q. Before you continue, did he tell you what happened to your
27 brothers who had been arrested?

28 A. They were arrested and they were taken to Schefflein. Camp
29 Schefflein was declared a killing zone. And when they took you

1 there, no mercy for you. So I said okay.

2 Q. Do you know whether any of those soldiers were actually
3 killed when they were taken - sorry. Do you know whether any of
4 those brothers of yours were actually killed when they were taken
15:51:04 5 to Camp Schefflein?

6 A. He never called the names. He said "many of your brothers
7 from Nimba", but he never called the names. I said okay.

8 Q. My question was: Do you know whether any of them were
9 actually killed when they were taken to Camp Schefflein?

15:51:29 10 A. I heard that they were killed, but I was not at the scene.
11 And later another MP came with my wife, he was the one who told
12 my wife's mother. I will get to that later.

13 Q. Continue.

14 A. So I left and went to the bush. And the same day Yassieh
15:52:03 15 left, it was that very day in the evening around 6 to 7, a boss
16 arrived in the yard with some MPs on board and they were headed
17 by one Corporal Clay. C-L-A-Y.

18 And when they got to the compound, there was one - there
19 were - I'm talking about a two-buildings, twin residence, right
15:52:42 20 at the back of Careysburg when you are heading towards Kakata.
21 And when they got into the compound, they rushed into the two
22 houses and they started conducting searches all over. All over.
23 In the ceilings, under the beds, all over the place. But they
24 could not find me.

15:53:02 25 And then my wife told them that, "I told you people that I
26 had separated with that man ever since and I do not know his
27 location." And the duty commander with the manpower who went
28 there, their commander was a corporal, and then it was then
29 Corporal Clay said, "Old mom, your daughter has a long living

1 person because she was blessed by God, because the way we
2 captured her, if we had brought her here and if we had seen
3 T Zaymay here, we would have taken him to the President. It was
4 an instruction given to us that if we came here and saw him here,
15:53:44 5 he was declared a rebel, we were to kill him. Because - but now
6 your daughter is free. All she told us was true."

7 And then we are now leaving. But the thing that we will do
8 wouldn't have been small. Those rebels who came --

9 Q. Just pause there. The last part of your answer has not
15:54:11 10 been recorded. Would you like to repeat the last part of your
11 answer where you said what she told us is true and your daughter
12 is free, what did you say after that?

13 A. "God bless - that God bless your daughter, she will live
14 long. But if we were to see T Zaymay here, we were going to
15:54:42 15 decapitate the both of them and take their heads to the
16 President. And that if we were to see T Zaymay here, we were
17 going to kill him on the spot. We will take T Zaymay's head,
18 your daughter's head and we will take them to the President. So
19 now your daughter is free. She can go."

15:55:02 20 But he said, "The things we are doing now are not small.
21 Those Nimba County rebels, they think they are clever. We fooled
22 them. We asked them to come for double pay. But when they came,
23 there was a whole force of Doe's rebels from Nimba County, the
24 Gio and the Mano. We collected them and took them to
15:55:36 25 Camp Schefflein. We buried them alive - many of them alive in
26 the same hole. So it's not easy." And they left. So I stayed
27 in the bush.

28 That very night, at about 1 to 2 o'clock, my wife came to
29 me crying. She explained everything. She said, "I suffered and

1 I really suffered," but I told her, "Forget about it." And by
2 then I was now deciding to leave the country. But how could I
3 get to Nimba? So I stayed there and I did not know much because
4 I was thinking that this guy could come back at any time. I
15:56:32 5 didn't know. I did not want to put my family's life in danger,
6 so I decided to stay in the bush for a while.

7 I was there. They will cook at home and bring my food. I
8 stayed there until I grew beards and I was still there. And I
9 sent Yassieh, my brother-in-law, I sent for him. He came. He
15:57:01 10 went and prepared some kind of false ID card that I was a PPF
11 security. I had grown so much beards and I was now planning to
12 leave the area and go into exile.

13 Q. PPF security. What is PPF security?

14 A. PPF, that was the security that was based in Yekepa called
15:57:32 15 PPF, a Planned Protection Force. PPF, Planned Protection Force.

16 Q. Was it a private company - was it a private force or a
17 force in the government?

18 A. No. It was a security created for the LAMCO company at
19 Yekepa.

15:58:04 20 Q. Okay. Please continue.

21 A. So my brother-in-law prepared my ID card and brought it,
22 and I had now spent a long time in the bush and I grew beard. So
23 I sent for my wife. She came and I told her to look for 500 for
24 me because I said I wanted to leave that place. And she told me
15:58:31 25 if I went, I will be killed. But then she went and brought the
26 500 - \$500 Liberian. At that time the transportation was less.
27 Things were not costly by then. So she brought the 500 and I
28 told her to go for my food. When she left to go for the food,
29 while she was going I started making my way. I went and I got a

1 car on the highway. I took the car to go to Kakata. And when I
2 got to Kakata, I got into another car to go to Gbarnga. And at
3 Gbarnga, I got - I found another car for Sanni quellie Nimba. And
4 from Nimba I found a car for Karnplay. And from Karnplay I took
15:59:26 5 a car to Gborplay. And when I got to Gborplay - no, I first
6 found a car to Gbailay because Gbailay was the border point with
7 Ivory Coast and from that town to the Waterside was a short
8 distance, and from there you enter into Ivory Coast.

9 Q. Sorry, what was the name of the last town on the border
15:59:50 10 with Ivory Coast?

11 A. The last town I got to before I crossed to Vai, the town
12 was called Gbailay.

13 Q. Can you help us with the spelling of that town?

14 A. No, I don't know that one.

16:00:11 15 Q. Would you like to repeat the name again and I will probably
16 attempt a spelling after the break?

17 A. Gbailay. Gbailay. It was a Gio town. It's a Gio town at
18 the border called Gbailay.

19 PRESIDING JUDGE: Mr Chekera, we'll have to pick up those
16:00:36 20 spellings. There's another name as well, the town after
21 Sanni quellie Nimba. He got a car from somewhere and went to
22 somewhere. All of these are not clear. We'll take it up after
23 the break. We'll reconvene at 4.30.

24 [Break taken at 4.00 p.m.]

16:25:00 25 [Upon resuming at 4.30 p.m.]

26 PRESIDING JUDGE: Mr Chekera, please proceed. And don't
27 forget the spelling of those locations.

28 MR CHEKERA: Yes, Madam President. Thank you. Just before
29 I proceed, to note that Mr Munyard just left the Defence side of

1 the Bench.

2 I'll probably just ask the question so that I don't appear
3 to be leading evidence. I suspect we all know what the name of
4 the town is:

16:33:11 5 Q. After Gbarnga, which town did you go to on your way out?

6 A. After Gbarnga I went to Ganta.

7 Q. And from Ganta where did you go?

8 A. From Ganta, because I couldn't find a car that could take
9 me directly, so I was taking one and dropping on the way. So

16:33:46 10 from Ganta I booked a car for Sanni quellie.

11 MR CHEKERA: I don't know whether we need a spelling.

12 PRESIDING JUDGE: Sanni quellie is on the record.

13 MR CHEKERA: Thank you.

14 Q. And from Sanni quellie where did you go?

16:34:02 15 THE WITNESS: From Sanni quellie I booked a car for
16 Karnpl ay.

17 Q. And you said the last place you were at the border is
18 Gbail ay?

19 PRESIDING JUDGE: Is Karnpl ay spel t?

16:34:17 20 MR CHEKERA: Karnpl ay, I think it's on the record but I
21 could spell it again. Karnpl ay is K-A-R-N-P-L-A-Y.

22 THE WITNESS: No, Karnpl ay is K-A-R-N-P-L-A-Y.

23 MR CHEKERA:

24 Q. And you said the last place - the last town was at the
16:34:48 25 border. The name of the town, just say the name and then I'll
26 attempt a spelling?

27 A. The last town - the name of the last town is Gbail ay.

28 MR CHEKERA: Madam President, phonetically I will spell it
29 G-B-A-I -L-A-Y.

1 Q. And from Gbailay where did you go?

2 A. I was in a car. From Gbailay - when I disembarked at
3 Gbailay, I walked to the Waterside to the river between Ivory
4 Coast and Liberia. That was where I crossed and got into and got
16:35:43 5 into the Ivory Coast.

6 Q. And which part of Ivory Coast did you proceed to?

7 A. The first town that you get to is Donglay in the Ivory
8 Coast.

9 Q. Are you able to help us with a spelling of Donglay?

16:36:05 10 A. No.

11 Q. I apologise, Madam President, I had not anticipated that
12 spelling. I will go by Donglay as it is spelt in the transcript,
13 which is as close it could be phonetically. I will attempt to
14 get a spelling later.

16:36:23 15 And where did you eventually end up when you went to Ivory
16 Coast?

17 A. From Donglay I proceeded to the district headquarters
18 called Zongwe.

19 Q. I think Zongwe has been spelled before. Yes. And did you
16:36:46 20 settle in Zongwe?

21 A. Yes. When I got to Zongwe that was where I met a lot of my
22 brothers, the AFL who had escaped from Doe, and a lot of
23 civilians. I came across over 35,000 displaced people in the
24 Ivory Coast, and the headquarters was in Zongwe.

16:37:10 25 Q. Sorry, did you say the number was 35,000 displaced people?

26 A. Over 35,000 displaced people, those who were staying at the
27 riverbank, those who had escaped. Women and men.

28 Q. Just for the record to be clear, where had they escaped
29 from?

1 A. When I got there, I found many - I met many civilians, old
2 women, pregnant women, of the Gio ethnic group. We were from the
3 same area. I met many of them there and I asked them why they
4 were there and they said, Oh, we learnt that you too were - you
16:38:01 5 were not coming to exile, so why are you here? And I said, It's
6 not easy. When Quiwonkpa spoke, we heard Quiwonkpa over the
7 radio. Those of us who were here were jubilating. But later
8 when the English changed, when Doe spoke, all of us went into our
9 shells. Now the Krahn soldiers came here and they were
16:38:29 10 patrolling in a truck, in a pick-up full of armed men, and at
11 night they would come to the town and start beating up people and
12 killing people. Even some of the towns were burnt down, the
13 villages. Even many of the villages were burnt down. Everybody
14 here was a rebel. That was what caused us to run away to go into
16:38:55 15 exile. That was what they told me.

16 Q. And while you - how long did you stay in exile in Ivory
17 Coast?

18 A. I entered into exile in February 1986 and I stayed there
19 until 1987, February.

16:39:27 20 Q. And while you were in exile in Ivory Coast, what were you
21 doing?

22 A. When I went into exile, I met Prince Johnson and a lot of
23 my colleagues in the army who had escaped. We met there - in
24 fact, when I went there, there was a group there. There was a
16:39:54 25 plan to --

26 Q. A group of who, if you can describe before you proceed with
27 the explanation. You met a group there. What group did you
28 meet?

29 A. I met a group of former AFL personnel who had escaped into

1 exile and a lot of civilians. Those were the men that I met
2 there. And a group was organised by Prince Johnson and - by
3 Prince Johnson. By Prince Johnson.

4 Q. Yes. And what was the group organised for?

16:40:39 5 A. The group was organised by Prince Johnson, Augustine
6 Wright, Augustine D Zammay, that is, the soldiers, we cannot die,
7 because at that time there were no refugee activities at that
8 time. There were no relief supplies at that time. We brushed
9 people's coffee arms and harvested palm nuts for survival. So we
16:41:15 10 said that the suffering was too much. "Gentlemen, our people who
11 had come from Nimba were all here suffering. We should retreat
12 to consolidate. We should stay right here and go back to Liberia
13 to attack Doe and his forces." So it was our plan to stay there
14 and go back to Liberia with a war to fight. If we were to die,
16:41:58 15 it was better for us to die in Liberia than to die on a different
16 soil. That was our plan.

17 Q. And when you were resolving to go back to Liberia to fight,
18 what was your objective in fighting Doe?

19 A. It was for us to go there and unseat the government, to
16:42:23 20 redeem the Nimbadians. Even if we were only to capture Nimba
21 County and declare it independent, that was what should have
22 been. But there was no way we could have all died there.

23 Q. There was no way you could have died there, where do you do
24 mean? When you say there was no way we could die there, where do
16:42:49 25 you mean by "there"?

26 A. Because we were fed up with the misery in exile, so we were
27 going to force our way - so if we were going to die in Liberia,
28 let Doe kill all of us there, because without going there would
29 be no money. Look at all our people suffering for food.

1 Q. Now, did you carry out that plan?

2 A. There was no supporter at that time. We had some groups in
3 Abidjan. We called them our heads. Like Cooper Miller and the
4 late deputy vice Head of State for Doe, General Podier. He was
16:43:50 5 also in exile in Abidjan. So these - we depended on these people
6 to come and lead us. There was no way. That was how Mr Charles
7 G Taylor came in, because of humanitarian feelings. We did not
8 know where he was. We were expecting anybody to lead us.
9 Luckily for us he recruited us and that was how he came in to
16:44:35 10 redeem the Nimbadians.

11 Q. Did Mr Taylor actually come to recruit you in Zongwe?

12 A. He did not come --

13 PRESIDING JUDGE: Wait, wait, wait. Ms Howarth?

14 MS HOWARTH: Yes, I'm on my feet. I believe that's a
16:45:01 15 leading question. I believe it could have been put in a more
16 open form.

17 PRESIDING JUDGE: Certainly. Certainly. You could ask
18 differently.

19 MR CHEKERA: Yes.

16:45:09 20 PRESIDING JUDGE: It's very leading, whichever way you look
21 at it.

22 MR CHEKERA: I'm just trying to follow-up. Yes:

23 Q. Now, you've mentioned - you've said in your answer that is
24 how Mr Charles Taylor came in, because of humanitarian feelings.
16:45:35 25 Where did - how did Mr Charles Taylor come in? When you say that
26 is how Mr Charles Taylor came in, can you explain what you mean?

27 A. Yes. I said this because when we were suffering in exile,
28 Nimba County was in tears. A lot of citizens from Nimba County
29 had gone into exile. There were no refugee activities. There

1 were no relief supplies. Our area --

2 THE INTERPRETER: Your Honours, can he kindly repeat the
3 last bit of his answer.

4 PRESIDING JUDGE: Yes, Mr Witness, the interpreter didn't
16:46:28 5 get what you said. You said there were no relief supplies. Our
6 area. Continue from there.

7 THE WITNESS: There were no relief supplies at that time.
8 Our area was deserted. All our families fled from there because
9 they had been declared rebels. So Nimba County was in tears.

16:46:56 10 MR CHEKERA:

11 Q. Sorry, I am just going to restrict you and direct you
12 directly to my question. How did Mr Taylor come in?

13 A. Because of all these activities, Mr Taylor --

14 PRESIDING JUDGE: Please pause, Mr Witness. Ms Howarth?

16:47:19 15 MS HOWARTH: Yes, I'm objecting again because there's some
16 ambiguity about what he means by come in. I think Mr Chekera
17 certainly put, when he rephrased his question the second time,
18 what's meant by come in. In my submission, that's a more
19 appropriate basis to start this line of questioning than assuming
16:47:34 20 a place that he came into.

21 PRESIDING JUDGE: I think the witness used the words "this
22 is how Mr Taylor came in" and if the lawyer - if Mr Chekera asks,
23 "So how did Mr Taylor come in," it's appropriate. It's an
24 appropriate question to ask.

16:47:52 25 MS HOWARTH: Very well.

26 PRESIDING JUDGE: The words were the witness's words, not
27 Mr Chekera. So the objection is overruled.

28 MR CHEKERA: Thank you, Madam President:

29 Q. Do you still remember the question, Mr Zaymay?

1 PRESIDING JUDGE: Repeat the question. It's easier.

2 MR CHEKERA:

3 Q. The question was: How did Mr Taylor come in?

4 A. Mr Taylor came in by recruiting us and taking us for
16:48:20 5 training. Before Mr Taylor could come in, there was problem
6 already in Liberia.

7 Q. When you were in Zongwe, was Mr Taylor in Zongwe?

8 A. No, I do not know.

9 PRESIDING JUDGE: Please pause. Mr Chekera, you're going
16:48:47 10 to have to pull your act together. You keep leading this
11 witness. And I don't expect the Prosecution to stand up with
12 every question that you ask to object.

13 MR CHEKERA: Indeed, Madam President. I will rephrase:

14 Q. Mr Zaymay, how were you recruited in Zongwe?

15 A. I was recruited by Godfather, by Godfather.
16:49:10 15

16 Q. Where was that that Godfather recruited you?

17 A. Godfather recruited me in Zongwe.

18 Q. Yes. And when he recruited you, did he tell you for what
19 purpose he was recruiting you?

16:49:41 20 A. We were already on stand-by expecting to come and wage war
21 in Liberia. We were expecting anybody from Abidjan, like all our
22 heads, to come and take us anywhere for training. So when
23 Godfather came, I knew that he had come for training; that I was
24 prepared for.

16:50:08 25 Q. Do you know whether Godfather is known by any other name?

26 A. Yes. They called him Alfred Mehn.

27 Q. What happened when Godfather approached you?

28 A. When - Zongwe is a big city where we lived, so we left.

29 And when we came back, they said our friends have gone, the first

1 group has gone. Whilst we were waiting, Godfather came and he
2 said he had come for the second group. He said, "Go and collect
3 all your friends."

16:51:06 4 Q. Sorry, you said when we left and when we came back, they
5 said our friends have gone, the first group has gone. Who are
6 you referring to as "when we left" and which group are you
7 referring to? Would you like to explain a bit further on that?
8 Because there is a lot that is not clear. You are now talking in
9 plural, so just go back and explain to us what exactly happened.

16:51:27 10 A. We were leaving in groups in Zongwe. We used to go in
11 groups to hustle. I and the group went hustling, and when we
12 returned in the evening, they told us that the first group of
13 recruits - in fact, they told us that these people - that there
14 was an Ivorian. They did not know why these people were going.
16:51:56 15 They only said that our friends have gone. We did not know where
16 they had gone, but we should wait because the man who had taken
17 them along was going to come back. So we did not go anywhere.

18 We stayed and the next day Godfather came. That, "Zaymay, I
19 would want you to go and contact your friends. The movement has
16:52:18 20 started. You guys are going to Israel for training. You've
21 been long crying to go. It's time now to go. You would go. The
22 first group has gone. I would come for the second group." That
23 was how I started going from place to place. That was how the
24 second group was organised, a group of 43 men.

16:52:44 25 Godfather came and gave us each 10,000 CFA, which is equal
26 to 1,500 LD. We put that in our pockets. "Here is your bus
27 ticket. Get on board the bus and move." Everybody was happy.
28 Everybody was in high spirits because we had long been waiting
29 for that movement. So for - the 43 men left and we went to

1 Abidjan. Before we could get to Abidjan, our train ticket had
2 already been prepared. We were given our train ticket and we got
3 on board the train for Burkina Faso.

4 Q. Who prepared and gave you the train tickets?

16:53:32 5 A. The train ticket was given to me by Godfather. There was a
6 team that was recruiting. So when Godfather came for us, there
7 was another gentleman in Abidjan who was in possession of the
8 tickets. As you got there, they will give you your ticket and
9 you get on board the bus.

16:53:57 10 Q. Are you aware of the other members of the team that was
11 recruiting? Do you know who they were?

12 A. Yes, yes.

13 Q. Who were they?

14 A. The team that recruited was, one, Godfather; two, Yegbeh
16:54:20 15 Degbon. These comprised the recruiting team.

16 Q. And do you remember who gave you the train tickets?

17 A. Yes.

18 Q. Who was it?

19 A. It was William Obai.

16:54:47 20 Q. Now, you were telling us about when you got the train
21 tickets. Please continue from there?

22 A. When they gave you your train ticket, you got on board the
23 train and you were to be careful, because there were other groups
24 in Abidjan and they did not want to know about your movement

16:55:07 25 because they would sabotage it, so you had to be smart. When you
26 got your train ticket you got on board the train, the 43-man
27 group --

28 Q. Sorry, just pause there. You said there were other groups
29 in Abidjan that would sabotage you. Which other groups are you

1 talking about?

2 A. Godfather, he speaks French well. He was a sailor. So
3 Godfather was staying in Abidjan. He told us that Podier -
4 General Podier was also fighting over the recruitment. So
16:55:58 5 General Podier has his men in Abidjan. They knew that the
6 movement has started. So if they see a group of you Liberians
7 here, they would report that to the police to sabotage the
8 movement. So you had to be careful. That was why as we were
9 leaving, nobody was to stay in Abidjan. Yes.

16:56:30 10 PRESIDING JUDGE: Mr Chekera, clarification again. The
11 witness earlier, I think at page 63, line 17, he spoke of three
12 men that left to Abidjan. Is it really three men that left to
13 Abidjan? What was the number of the men who left for Abidjan?

14 MR CHEKERA: Thank you, Madam President:

16:56:56 15 Q. You mentioned about men who left to go to Abidjan. What
16 was the number of the men who left for Abidjan?

17 A. In the first group?

18 Q. Yes, let's talk of the first group.

19 A. Yes, but I never talked about three men going to Abidjan.

16:57:20 20 The first group that left that went to the base, I was not in the
21 first group so I did not know their total.

22 Q. And the second group, what was the number in the second
23 group?

24 A. I was in the 43-man group.

16:57:41 25 MR CHEKERA: Madam President, does that assist? Thank you:

26 Q. Now, when you got the train tickets, what did you do?

27 A. I booked the train, the 43 men, and we headed for
28 Ouagadougou.

29 Q. Sorry, you did what the train? Repeat the answer again.

1 A. I said after you had gotten your ticket, you got on board
2 the train in Abidjan at the train station. 43 men, we boarded
3 the train that was heading for Burkina Faso.

4 Q. And did you reach Burkina Faso?

16:58:36 5 A. Yes, I got to Burkina Faso safely, passed the night at the
6 train station.

7 Q. Yes, after that did you go anywhere else?

8 A. From there we went straight, boarded a plane that was
9 flying - our main destination was to be Israel, because I was
16:59:04 10 told by the recruiting team that we were heading for Israel.

11 Q. And did you go to Israel?

12 A. We went and we disembarked at a strange place and I was
13 told that was Tripoli, Libya.

14 Q. And were you taken to any particular part of Tripoli when
16:59:28 15 you landed in Tripoli, Libya?

16 A. Yes, when we got there, there was a bus that took us to the
17 military barracks called Tajura.

18 Q. Yes, and what happened when you got to Tajura?

19 A. When I got to Tajura in a big camp that was fenced with
16:59:57 20 barbed wire and everything was electrified - it was a decent
21 camp - we got to the camp and we saw a lot of people. They took
22 us to the Liberian building.

23 Q. The people you saw at Tajura, do you know which countries
24 they came from?

17:00:28 25 A. Yes, there were a lot of nationals there for training.
26 There was Bansa Moro, Aceh Sumatra, Latin America. Bansa Moros
27 are the Filipinos. There were Sierra Leoneans on the base.

28 Q. Just pause there. We just want to get the spellings right.
29 The first people --

1 A. Okay.

2 Q. The Filipinos, you said they were known as what?

3 A. The Bansa Moro. The Filipinos.

4 Q. Are you able to help us with the spelling of Bansa Moro?

17:01:14 5 A. No, but they said that they were the Bansa Moro, but they
6 were from the Philippines.

7 MR CHEKERA: I will attempt the spelling B-A-N-S-A,
8 M-O-N-R-O-U. I will try to verify the spelling.

9 JUDGE LUSSICK: It's Moro. It's M-O-R-O.

17:01:44 10 MR CHEKERA: Thank you, my Lord.

11 THE WITNESS: It's the same Philippines.

12 MR CHEKERA:

13 Q. Yes, and which other nationalities did you say?

14 A. Sumatra.

17:01:59 15 Q. And which other tribe - sorry, which other nationalities?

16 A. The Latin Americans, the Senagambia.

17 Q. Yes?

18 A. Sierra Leoneans.

19 Q. Any other?

17:02:28 20 A. Few men from Ghana. Ghanaians.

21 Q. Do you know what all those people were doing at Tajura?

22 A. Yes.

23 Q. What were they doing?

24 A. All of us were training to liberate our various countries
17:03:00 25 to make a change.

26 PRESIDING JUDGE: Mr Chekera, it would be helpful if we had
27 some time frames. For example, the last time frame we have on
28 the record is where the witness says he entered exile in February
29 1986 and stayed there until February 1987. Now, this could be

1 referring to Ivory Coast; I don't know. It's vague. But a lot
2 has happened since February 1986. If you could lead evidence
3 relating to certain time frames.

4 MR CHEKERA: Yes, Madam President:

17:03:45 5 Q. Now, did you recall the time or the date that you arrived
6 in Libya - or at least the year that you got to Libya?

7 A. Yes.

8 Q. When did you get to Libya?

9 A. I left the Ivory Coast in February 1987. I spent almost a
17:04:36 10 year in the Ivory Coast, and I left the Ivory Coast in February
11 1987 for my destination.

12 Q. And how long did it take you to get to Libya from the time
13 that you left Ivory Coast?

14 A. I cannot remember.

17:05:00 15 Q. Did it take you days to get to Libya from Ivory Coast, or
16 did it take you more than days?

17 A. In the train - it took me roughly three days in the train.
18 From Burkina to Libya it took me one day. The following morning
19 I was there.

17:05:27 20 Q. Would it therefore be fair to say that you arrived in Libya
21 sometime around February 1987?

22 A. That same February month. I travelled within the same
23 February month.

24 Q. Now, you've talked about the different nationalities that
17:06:03 25 you found at --

26 PRESIDING JUDGE: Sorry, Mr Chekera, you seem to be
27 glossing over this. The witness was in Abidjan, Ivory Coast. He
28 was also at Ouagadougou somewhere at a certain time.

29 MR CHEKERA: Let me just clarify:

1 Q. When you left Ivory Coast you said you went to Ouagadougou,
2 and it took you three days to travel to Ouagadougou. When you
3 got to Ouagadougou, did you stay in Ouagadougou?

4 A. I got there in the evening and I passed the night there,
5 and the following morning I travelled to Libya.

17:07:02

6 Q. Thank you. You said when you got to Tajura there were a
7 number of nationalities that were present in Tajura. You've
8 mentioned the Sierra Leoneans, a few Ghanaians, Latin Americans
9 and the Gambians, among others, and you said they were training
10 there. When you got to Tajura, did you yourself take training?

17:07:45

11 A. When I got to Tajura, at that time no training was going
12 on. Everybody was on movement. Groups were coming in
13 continuously. The training? Yes, I did training in Tajura. The
14 training commenced in general. They assembled us, and the

17:08:28

15 instructors spoke to us that the training would start on so and
16 so date and that everybody was to prepare for the training. They
17 didn't want to train countries individually. They trained
18 generally. The training started on the 10th - if the training
19 was to start on the 10th of this month, everybody was to be aware
20 that it was to be started on the 10th. It was a general training
21 for all recruits, not by countries.

17:08:54

22 Q. And you said that groups were coming in. Groups of which
23 nationalities were coming in?

24 A. The recruitment was still going on. I was in the second
25 group. The third group had to come. The fourth group was still
26 to come. So other people - when they were up to strength, they
27 would say, okay, and recruitment would stop. Others were still
28 recruiting. So if you say you were up to your number, they will
29 say, "You've got to wait for the other people." So everybody was

17:09:19

1 to go to up to strength before this training could commence. The
2 training was to start generally.

3 Q. And your group, what was the total number of your group
4 eventually?

17:09:57 5 A. Our group was 168 men. 69, and one died during the
6 training and we remained 168.

7 Q. And do you recall when, after you arrived, training
8 commenced?

9 A. No. It took long before the training could start.

17:10:40 10 Q. Approximately how many months or weeks did it take before
11 you commenced training, if you recall?

12 A. I cannot tell how many months it took before the training
13 commenced, but I know that the training started generally.

14 Q. Your group, the Liberians, did you have a name when you
17:11:13 15 were at Tajura?

16 A. Yes, we had a name that the instructors - the Libyans used
17 to call us and it's an Arab word, but I cannot remember it. But
18 we used to call Liberian, Liberian.

19 Q. And was that the name that you called yourself? Did you
17:11:43 20 call yourself Liberian or did you call yourself by another name?

21 A. I am a Liberian. If the instructor was calling me
22 Liberian, that was the name that they called us. I know that you
23 and I are Liberian, I will call you by your name. But that was
24 the name that the instructor used to call us.

17:12:10 25 Q. You talked about the few Ghanaians --

26 JUDGE DOHERTY: Just before you go to another question,
27 Mr Chekera, I find this confusing. "I will call you by your
28 name, but that was the instructors used to call us." Did they
29 call them Liberian, you, Mr Liberian, or what does he mean by

1 this?

2 MR CHEKERA: Let me clarify:

3 Q. When the instructors would refer to you, who would they
4 refer to you as, if they didn't call your name?

17:12:59 5 A. How would they call you if they did not call your name?
6 They did not know your name. We were using numbers.

7 Q. Collectively as a group, how would they refer you to as,
8 collectively as a group?

9 A. As a group together they called us - we all were living in
17:13:23 10 individual buildings. There was a special building for Liberians
11 that was occupied by all Liberians. There was a building for
12 Sumatrans, when Sumatrans stayed. So they called us Liberian.
13 They called us Liberians. They had a name for us in Arabic, but
14 I can't get it. They were speaking Arabic. But they called us
17:13:44 15 Liberian. If they said Liberian, that meant that they were
16 talking to us in general.

17 Q. You mentioned that - initially when I asked you about your
18 recruitment, you said that you were recruited by Mr Charles G
19 Taylor. You've told us about how Godfather recruited you and
17:14:17 20 took you to Libya. How does Mr Taylor come into the picture?

21 A. Okay. After the recruitment, some of our friends who were
22 not in the army whom we had met in exile, you know, there was
23 argument going on that Quiwonkpa was our leader and that he was
24 coming to us, and I told them, "Gentlemen, that's a lie.
17:14:49 25 Quiwonkpa had been killed in the army. I saw his body. There
26 was no more Quiwonkpa. There must be a different man that was
27 going to take us."

28 So one day Cooper Teah and Augustine Wright, they were our
29 heads at the base and they summoned us and told us that our

1 leader was coming. Someone was coming to introduce himself to
2 us. The man who had brought us there was coming to introduce
3 himself to us. So when he comes we will see him. Cooper and
4 others knew who the person was that they were hiding from us.

17:15:33 5 One morning they called for a formation. The building that
6 we were living in, it was a big building, about eight-storeyed
7 building. That was the building that we occupied.

8 THE INTERPRETER: Your Honours, can he kindly repeat what
9 they had.

17:15:50 10 PRESIDING JUDGE: Please stop, Mr Witness. Pause. You
11 have to repeat your evidence a little bit more slowly where you
12 say, "The building that we occupied." Continue from there.

13 THE WITNESS: There was a special building for every
14 nationality at that time. That was the largest base. There was
17:16:13 15 one building that was occupied by all Liberians and this building
16 had an auditorium. It's an eight-storey building that had a big
17 auditorium. There was a basketball area in that building.

18 Our heads at that time, when they rang the bell and said,
19 "Auditorium," everybody would go to the auditorium. We would go
17:16:41 20 there and take our seats. We sat down silently and they said the
21 leader was coming. And when we looked, it was Charles G Taylor
22 who arrived. They brought him on stage. They had an area that
23 had been prepared where they sat whilst we sat on the other side.
24 He spoke to us. Cooper Miller made the introduction.

17:17:14 25 He said, "Gentlemen, we've long been crying for a leader to
26 lead us. Now I will introduce Mr Charles G Taylor to you people.
27 He will be our leader to lead us to Liberia." That was how
28 Charles G Taylor came in as a leader. He told us, "Gentlemen,
29 listen. All of you put your hands up one after the other to tell

1 me what you were doing in the Ivory Coast." And we all did that.

2 He said, "Okay, I have heard your cries. I have heard the
3 cries of Nimba County. My wife is from Nimba County. Qui wonkpa
4 was my friend from Nimba County. Qui wonkpa never listened to my
17:18:23 5 advice. That was why he took untrained people to Liberia to Doe.

6 So today - from today, I am your leader. You call me Mr Charles
7 G Taylor. I am your brother-in-law. I would lead you to Liberia
8 to make a change. Nimba County is one of the populated counties
9 within Liberia. The whole of the county cannot be deserted like

17:19:01 10 this and the citizens are dying in exile like that. I have heard
11 that and that's why I am here to lead you people. I am your
12 leader and I don't want you people to carry any organisation's
13 name. Only that same name that Thomas G Qui wonkpa took to

14 Liberia when he was killed. It is that same organisation that is
17:19:31 15 continuing and it is that same organisation that we'll take
16 along. So our organisation's name would be" --

17 Q. Sorry, please, yes, continue.

18 A. "The name of our organisation would be NPFL. Only one
19 letter would be added. Qui wonkpa's own was NPFF, National
17:20:09 20 Patriotic" --

21 Q. Yes, sorry, please continue. That's what I was going to
22 ask you to explain. What does NPFF stand for, if you know?

23 A. "The name of our organisation would be NPFL, National
24 Patriotic Front of Liberia. That would be the name of our
17:20:32 25 organisation. It was that same organisation that Qui wonkpa took
26 along, so we could carry the same motto. We are going to revenge
27 for Qui wonkpa. We are going to redeem Nimba County. We are
28 going to bring change to Liberia. So I am your leader, Charles G
29 Taylor."

1 Q. Just pause there. Two issues I'm going to raise with you.
2 You said initially that the name of Quiwonkpa's organization was
3 NPFF. Do you know what NPFF stands for?

4 A. Yes.

17:21:14 5 Q. Please tell us.

6 A. NPFL. Can you give me a pencil and pen?

7 PRESIDING JUDGE: Certainly. Madam Court Officer?

8 THE WITNESS: Yes. Quiwonkpa's organization NPFF, National
9 Patriotic Front Forces. National Patriotic Front Forces. NPFL,
10 National Patriotic Front of Liberia. These are the meanings of
11 the letters.

17:22:37

12 MR CHEKERA:

13 Q. Yes. And you explained that one of the purposes why you
14 were going to go back to Liberia was to revenge Quiwonkpa's
15 death. Can you explain what you mean by revenge Quiwonkpa's
16 death?

17:22:59

17 A. The reason was for a cause. The mission to go to Liberia
18 was to make a change in general, to make a change, to redeem
19 Nimba County from the hands of the wicked, to make a change.

17:23:24

20 Q. When you use the words "revenge Quiwonkpa's death", who
21 were you going to take revenge against or what did you exactly
22 mean? That's what I want you to just explain to the Court.

23 PRESIDING JUDGE: Isn't the English term "avenge"?

24 MR CHEKERA: He had used the word "revenge".

17:23:48

25 PRESIDING JUDGE: The interpreter used the word "revenge",
26 I think. The English word is "avenge" someone's death.

27 MR CHEKERA: Indeed, Madam President.

28 PRESIDING JUDGE: Mr Interpreter, would you argue with me
29 on that?

1 THE INTERPRETER: No, your Honour. I just used the word
2 the witness used. I won't argue with you, but that was what the
3 witness used, "revenge".

4 PRESIDING JUDGE: The witness said "revenge"?

17:24:14 5 THE INTERPRETER: Yes, he did.

6 MR CHEKERA: Madam President, through you, if I could just
7 ask whether that literally translates to revenge in English from
8 Liberian English, because I would have heard in the context the
9 same word you had used.

17:24:30 10 PRESIDING JUDGE: Mr Interpreter, in Liberian English does
11 "revenge" translate into revenge in English, or avenge.

12 THE INTERPRETER: Yes, your Honour, in order to be able to
13 determine the meaning you need to know the background from which
14 the witness is speaking from.

17:24:54 15 PRESIDING JUDGE: In which case, Mr Chekera, I think you
16 ask for clarification from the witness what he meant.

17 MR CHEKERA: Thank you:

18 Q. When you said one of your purposes was - when you were
19 going back to go to Liberia was to revenge Quiwonkpa's death,
17:25:09 20 what exactly did you mean?

21 A. It meant to fight Samuel Kanyon Doe who had killed
22 Quiwonkpa, to kill him too. To unseat his government and to kill
23 him as well. Because he had killed Quiwonkpa, we were to kill
24 him too. A tooth for a tooth. An eye for an eye. You kill my
17:25:35 25 brother and I'll kill you.

26 Q. Yes, and you also explained that you also wanted to do
27 something else. Was that the only object that you had, to kill
28 Doe?

29 A. Yes, the only objective was to kill Doe and unseat his

1 government in order to bring change. When Doe dies, a new
2 government would come and Nimba County would never suffer.

3 Q. And what change did you want to bring?

4 A. A democratic change to install a democratic form of
17:26:16 5 government for everybody to get freedom.

6 Q. Yes, now let's go back. You were telling us about the
7 meeting you had when Mr Taylor was introduced to you, and you
8 were telling us the objectives that you set out. Could you
9 please just continue from there?

17:26:35 10 A. After we've had - he has had that meeting with us, he
11 advised us that the training was not going to be easy. Those of
12 us, the Liberian soldiers, we might forget about Liberian
13 training. We cannot compare the training there. You cannot say
14 that you were an old soldier. The old soldier would be put on
17:27:02 15 one side. I learnt that there were a lot of civilians there who
16 had not been trained. But I told Godfather that the recruitment
17 should be AFL so that the training would not last long, but now
18 you've brought a lot of civilians. So the training was going to
19 last for two years because so many people are now in the group
17:27:30 20 that were not soldiers. The war was not going to be easy. We
21 cannot just go and hit and run.

22 PRESIDING JUDGE: Mr Interpreter, did you say for two years
23 or for three years?

24 THE INTERPRETER: Two years.

17:27:44 25 THE WITNESS: Two years. The training was to last for two
26 years, so you were to commit yourself to the training. The
27 training that you were going to get here would not be the same
28 training that you got in Liberia. Whatever comes your way, you
29 should withstand it. You should do the endurance. We said yes,

1 sir, chief, we will do it. Then from there he said we should
2 obey and obey the instructors. The instructors do not understand
3 English. They will speaking a different language, so you were to
4 learn ABC in a different language. So I wish you guys good luck.
17:28:31 5 Then he left.

6 MR CHEKERA:

7 Q. Now, when Mr Taylor came to the base, do you know where he
8 was coming from?

9 A. I did not know where he was coming from. That was my very
17:28:46 10 first time of seeing him on the base. We did not know where he
11 was actually coming from.

12 Q. Was that inside Libya or outside Libya, if you know that,
13 at least?

14 PRESIDING JUDGE: Was what inside or outside Liberia?

17:29:05 15 MR CHEKERA:

16 Q. Where he was coming from, was he coming from outside Libya
17 or from outside Libya [sic]?

18 A. I did not know where he was coming from. That was my very
19 first time of seeing him. I did not know where he was coming
17:29:18 20 from.

21 Q. When he came for this first meeting did you stay at Tajura,
22 or you left to go somewhere else?

23 A. After the briefing, he left that same day and he said he
24 would come another day to spend two days with us.

17:29:38 25 Q. Do you know where he went to when he left the base?

26 A. At that moment I did not know.

27 Q. Did Mr Taylor ever come back after the first meeting?

28 A. Yes, several times. He used to visit the base. He would
29 spend a day with us and return.

1 Q. Do you know where he would return to when he came to visit
2 the base?

3 A. Later I got to know where he was.

4 Q. Where was he?

17:30:17 5 A. He was at Mathaba.

6 Q. What is Mathaba?

7 A. Mathaba is the headquarters - was the headquarters for the
8 training. It is a camp that is called Mathaba where the staff
9 live.

17:30:41 10 Q. And in which country and in which city, if you know, is
11 Mathaba?

12 A. In Tripoli.

13 Q. And do you know what Mr Taylor was doing at Mathaba?

14 A. That was where he was living.

17:31:04 15 Q. Now, you have mentioned other groups that were at Tajura,
16 including the Sierra Leoneans and the Gambians. Were you able to
17 interact with these two groups when you were at Tajura?

18 A. Yes, we were living there as revolutionary brothers. The
19 Sierra Leoneans - the Gambians, the Senagambians could only speak
17:31:39 20 French, so I was not familiar with them because I couldn't speak
21 French. But we were all living in the camp: We were eating at
22 the same mess; we drank at the same mess; and we played
23 basketball at the same mess.

24 Q. Were you familiar with any African group besides the
17:31:56 25 Gambians, who spoke French?

26 A. I was not too close to them because I went there with my
27 own problem. I was not close to them. The training sometimes is
28 rough, and after the training you wouldn't even have time to go
29 anywhere else. But we would only meet at the mess house.

1 Q. Did you get to know any of the Gambians who were training
2 at Tajura?

3 A. I did not know any Gambian who was training in Tajura, but
4 I knew that there was a Gambian group. They used to call them
17:32:43 5 Gambians.

6 Q. And did you get to know anyone who was training in the
7 Sierra Leonean group?

8 A. Yes.

9 Q. Who did you come to know?

17:32:55 10 A. I knew Foday Sankoh and I knew one Mohamed.

11 Q. How do you know Foday Sankoh?

12 A. Foday Sankoh was a corporal, a recruit with whom we were
13 training at the same Tajura. We were sleeping in the same
14 Tajura. And later he was cooking, he was making tea.

17:33:20 15 Q. Where was he making tea and where was he cooking?

16 A. In the mess house. In the mess house.

17 THE INTERPRETER: Your Honour, can he kindly repeat his
18 answer slowly.

19 PRESIDING JUDGE: Please pause, Mr Witness. You are going
17:33:42 20 to repeat your answer. The interpreter didn't get you. You were
21 asked where was he making his tea and where was he cooking from?
22 What is your answer?

23 THE WITNESS: Answer: He was cooking in the mess house in
24 Tajura.

17:34:02 25 PRESIDING JUDGE: Mr Chekera, again could we have a time
26 frame for the address of Mr Taylor to the recruits, if possible.

27 MR CHEKERA: Indeed, Madam President, yes:

28 Q. Mr Zaymay, if you recall, how long after you arrived at
29 Tajura did Mr Taylor come to the base for the first time?

1 A. I cannot be exact. I cannot remember the time, but I know
2 it was before the training could start. He came and briefed us
3 before the training started, but I cannot estimate how long it
4 took.

17:34:47 5 Q. Maybe you could just help us. Was it a matter of months or
6 weeks after you came to the base that Mr Taylor came to the base
7 for the first time?

8 A. Approximately about one month, but I cannot be exact. I
9 don't know. I cannot tell. But all I know is that he came and
17:35:14 10 briefed us before the training started.

11 PRESIDING JUDGE: Do we have a time frame for when the
12 training started?

13 MR CHEKERA:

14 Q. And do you recall when it was that you started training?

17:35:36 15 A. Yes, the training started in 1987. 1987. The training
16 started in 1987. Closed to 1999 - it ended in 1999.

17 Q. Sorry, when did it close?

18 A. It closed in 1999.

19 Q. 1999?

17:36:20 20 A. Yes. I cannot tell the exact month.

21 Q. And how long was the training for?

22 A. The training lasted for roughly two months. Not exactly
23 two months. Roughly two years. Not exactly two years. Maybe
24 one year, eight months or one year, seven or one year, nine
17:36:49 25 months.

26 Q. We have your answer. You said the training started in
27 1987, that's when the training started, and you said your
28 training closed in 1999, and now you are saying that the training
29 lasted two years. Can you help us clarify that?

1 PRESIDING JUDGE: In other words, that's a total of over
2 ten years. From '87 to '99 is well over 18 years.

3 JUDGE LUSSICK: I thought I heard the witness say the
4 training lasted for roughly two months. Not exactly two month.

17:37:35 5 PRESIDING JUDGE: 1987.

6 JUDGE LUSSICK: Just a minute, Mr Witness.

7 PRESIDING JUDGE: Mr Witness, can you please hold your
8 words. The judge is saying something.

9 JUDGE LUSSICK: If you go to page 83 at line 14 on my
17:37:57 10 computer, the witness started saying that the training lasted for
11 roughly two months, not exactly two months. He then goes on to
12 say, "Roughly two years. Not exactly two years." So which one
13 of those, if any, was a slip of the tongue?

14 MR CHEKERA: Thank you, my Lord:

17:38:20 15 Q. Mr Zaymay, how long did you start your training - sorry,
16 when did you start your training?

17 A. The training started in 1987. I can remember that I left
18 Liberia in 1986 after the '85 invasion. 1986. I travelled from
19 Liberia in February. I travelled from Ivory Coast in February
17:38:58 20 1987 and I went to Libya. That same year, 1987, the training
21 started. The training ended in 1989. Excuse me. 1987 the
22 training started; the training ended 1989. 1989, that's the
23 exact date. Roughly two years, from 1987 to 1989. First, it was
24 a slip of tongue, sorry.

17:39:57 25 Q. You were telling us about the two Sierra Leoneans that you
26 knew and you were telling us about Foday Sankoh. Do you know
27 what Foday Sankoh's position was among the Sierra Leoneans in
28 Tajura?

29 A. Foday Sankoh was a floor man, a corporal.

1 PRESIDING JUDGE: What is a floor man?

2 THE WITNESS: He was just an element within a unit. He was
3 not a commander.

4 MR CHEKERA:

17:40:47 5 Q. And you mentioned someone by the name Mohamed, yes?

6 Mohamed. How did you come to know Mohamed?

7 A. Mohamed used to create fun. When we go to the mess house,
8 Mohamed would say that he can eat more than anybody else.

9 Mohamed would say he would eat ten apples, ten eggs, ten
17:41:31 10 tomatoes, he will put all together, ten, ten, on the table and he
11 will eat everything. So we used to have eating competition just

12 for fun at the base in the auditorium. The winner's gift - the
13 trophy that we gave to the winner would be a crate of canned soft
14 drinks because there was no alcohol there. The canned soft

17:42:07 15 drinks that we would give, we would contribute one each, canned
16 soft drink, until it sums up to a crate and we would put that on
17 the table. Any winner would take that as a trophy. So Mohamed
18 always won. He would eat the ten apple, the ten eggs and the ten
19 raw tomatoes. He used to create fun. That was how I knew him.

17:42:40 20 Q. Now, when Mr Taylor was visiting Tajura, was he in a
21 position to interact with the other groups that were at Tajura
22 besides your group?

23 A. Zero.

24 Q. Why do you say zero and what does zero mean?

17:43:03 25 A. Zero means negative. No.

26 Q. How can you be so certain?

27 A. Because I was providing security for him. I was a Military
28 Police commander on the base. Whenever - and I had the unit. We
29 installed a form of discipline on the base. I had - there was a

1 small room that I used to control as a cell, a confinement room,
2 for rude, indisciplined soldiers. Then I had a small office at
3 the entrance off the house close to the step that I took as my
4 Military Police headquarters. I had men with me. I was the
17:44:05 5 Military Police commander on the base. I was responsible for the
6 leader's security. And that was organised by our head, that
7 whenever the leader was coming to the base, when we had been
8 informed, I should deploy men to the gate to receive him. When
9 he comes, the security would receive him and bring them to the
17:44:33 10 building.

11 At that time everybody would be at the auditorium waiting
12 for his arrival. From the building, if he was staying the night,
13 there was a small place prepared there, a small building, like
14 those small - like those small containers or houses prepared -
17:45:00 15 some small house would be - a small house would be prepared.
16 Sometimes when he comes, that is where he spends the night. I
17 will provide guards to that door at that house. At that house.
18 Nobody was allowed to enter there. Even our own Liberian
19 trainees were not allowed, apart from the top. So there was no
17:45:30 20 way for anybody to even go there to talk to him. That's how it
21 happened.

22 Q. Now, you were recruited from Ivory Coast and you said your
23 total number came to 169. Do you know whether all the 169
24 Liberians were recruited in Ivory Coast through the same way you
17:46:09 25 were recruited?

26 A. Yes. Out of the 100 - that was the strength. We were
27 called the Special Forces. I knew everybody. And many died. So
28 the remaining of us, we would be 60.

29 Q. My question was: The 169 of you, were they, to your

1 knowledge, all recruited in Ivory Coast through the same way that
2 you were recruited?

3 A. Yes, all of us were recruited in the Ivory Coast. The team
4 that was later - the old man, our leader, asked, "Why is it that
17:47:03 5 most of these people were civilians? I wanted you to recruit
6 soldiers within the command of Samuel Kanyon Doe in Monrovia and
7 now you've brought a lot of civilians. The training would last
8 long. So the team," said the old man, "there are men here, these
9 men could be trained to be soldiers. There was no way I could go
17:47:30 10 in to recruit because of the Krahn people. The secret would leak
11 out." That was what the leader told us, that that was the reason
12 why he recruited all the Liberians in the Ivory Coast.

13 JUDGE DOHERTY: Mr Chekera, who is this "our leader"? Are
14 we still talking about Mr Taylor, as the witness has also
17:47:57 15 referred to two other people in much earlier evidence?

16 MR CHEKERA: Yes, let me just clarify:

17 Q. In your answer you said, yes, all of us were recruited in
18 Ivory Coast. The team that was later - the old man, our leader,
19 asked why it was that most of these people were civilians. The
17:48:22 20 old man and our leader, who are you referring to?

21 A. At that time Mr Charles G Taylor was the leader on the base
22 for the movement, for the NPFL. That is why - that was what the
23 recruiting team told us: That I cannot go inside because the
24 secret would leak out. I said the leader at that time - he was
17:48:57 25 our leader in Tajura.

26 Q. Yes. You also mentioned the presence of Ghanaians. Do you
27 know what the Ghanaians were doing at Tajura?

28 A. They were also training for a cause.

29 Q. Do you know what cause it was they were training for?

1 A. Before the training started, the instructor told us that
2 the training was for liberation. I am not training anybody who
3 would come from here to be a bodyguard to anybody. When you left
4 here you would be dangerous to any government that you go to. So
17:49:45 5 you were being trained purposely to leave here and go and wage
6 war in your country and to overthrow your President. That was a
7 request from your leader. All nationalities had a leader and
8 they met the instructor and they gave the instructor the
9 instruction that these men were being taken there to train to
17:50:09 10 wage war. So nobody was trained there to go and be a bodyguard.

11 We all went for our training. We were told by the instructor.
12 Q. Now, if any, do you know whether they answered to a name,
13 the Ghanaians? Did they have a name that they answered to? Your
14 organisation was called NPFL. Did they have an organisation?

17:50:36 15 A. No. I don't know the name of their organisation. I was
16 not part of their organisation.

17 Q. Do you know whether the Sierra Leoneans were under any
18 organisation and, if so, the name of the organisation?

19 A. No, no.

17:50:53 20 Q. What about the Gambians, do you know whether they were
21 under any organisation and, if so, the name?

22 A. No.

23 Q. Now, besides the Liberians who were under Charles Taylor,
24 were there any other Liberians at Tajura?

17:51:17 25 A. Yes.

26 Q. Who were those Liberians?

27 A. There was a group, a few men who were recruited from Ghana
28 by MOJA headed by --

29 THE INTERPRETER: Your Honour, can he kindly repeat the

1 name of this person.

2 THE WITNESS: Headed by Boima Fahnbulleh.

3 THE INTERPRETER: Let him kindly repeat the name of this
4 person.

17:51:55 5 PRESIDING JUDGE: Mr Witness, can you repeat the name of
6 the head of these people, of MOJA?

7 THE WITNESS: Yes. There was a small group from Ghana
8 called MOJA headed - recruited and headed by H Boima Fahnbulleh.
9 He was also on the base. Can I continue?

17:52:29 10 PRESIDING JUDGE: What does the H stand for?

11 THE WITNESS: No. H Boima Fahnbulleh, he was head of the
12 MOJA.

13 MR CHEKERA: Sorry, Madam President, may we continue?

14 PRESIDING JUDGE: Yes.

17:53:07 15 MR CHEKERA: Thank you:

16 Q. Yes. You were explaining about the MOJA group. Mr Zaymay,
17 you were explaining about the MOJA group and you said they were
18 under Fahnbulleh. Do you know where they were recruited from?

19 A. Yes.

17:53:37 20 Q. Where were they recruited from?

21 A. They were recruited in Ghana.

22 Q. And do you know how many were in that group, how many
23 people were in that group?

24 A. The number was small. It was not even up to 20. It was
17:53:59 25 less than 20.

26 Q. And what nationalities constituted that group?

27 A. They were mixed. There was - they were mixed Nigerians and
28 Ghanaians.

29 PRESIDING JUDGE: Did you not ask, Mr Chekera --

1 THE INTERPRETER: The interpreter would like to make a
2 correcti on. They were mixed Ni geri ans and Li beri ans.

3 [Mi crophone not acti vated] not correct, your Honour.

4 PRESI DING JUDGE: Sorry?

17:54:43 5 THE INTERPRETER: Ghanai ans and Li beri ans.

6 MR CHEKERA: Madam Presi dent, you were going to --

7 PRESI DING JUDGE: Yes. Because the questi on you asked thi s
8 wi tness ori gi nally was at page 89. You sai d, "Beside the

9 Li beri ans who were under Charles Taylor, were there any other
17:55:03 10 Li beri ans at Tajura?" To whi ch the wi tness repli ed yes. And you
11 sai d, "Who were those Li beri ans?" and then he descri bes MOJA.

12 And then you ask hi m agai n, "What were the national ities?"

13 MR CHEKERA: I see the poi nt, Madam Presi dent.

14 PRESI DING JUDGE: I thought we were talki ng about
17:55:28 15 Li beri ans.

16 MR CHEKERA: Maybe I wou ld rephrase that questi on.

17 PRESI DING JUDGE: In any event, he' s given an answer.

18 MR CHEKERA: Thank you:

19 Q. Of the MOJA group, how many Li beri ans were there?

17:55:48 20 A. There were only three Li beri ans.

21 Q. And do you know why they were traini ng at Tajura?

22 A. Yes, they were taken there to train, and after traini ng
23 they were to move to Li beri a to accompli sh the same missi on whi ch

24 the NPFL was to accompli sh: To unseat the Samuel Kanyon Doe
17:56:15 25 government.

26 Q. And what happened, i f anythi ng, to that group?

27 A. Yes, I di sorgani sed the group. When I got an i nkl i ng of
28 i t, they escaped, the other group.

29 Q. Can you please el aborate? Can you expl ai n to us how you

1 di sorganised the group and who escaped? Just explain in more
2 detail.

3 A. The number of the men was small, less than 25, and all of
4 us used to eat in the same mess house and we used to go for the
17:57:01 5 same training. We would sit country by country. One country
6 would come and go, one country would come and go. And after
7 training, we would take a break. Among the group there was a
8 fellow, my training mate, we joined together in '79. He was
9 called --

17:57:26 10 THE INTERPRETER: Your Honour, can he repeat the name of
11 the person.

12 PRESIDING JUDGE: Mr Witness, can you repeat the name of
13 this person, please?

14 THE WITNESS: Putu, P-U-T-U. Putu S Major, M-A-J-O-R. He
17:57:48 15 was my classmate. He was among the group. So I called him up
16 and said, Oh, my brother, what are you doing here? And he said,
17 I was in exile in Ghana, and H Boima Fahnbulleh recruited us to
18 come here. More people were to come. We were the first group to
19 come - to go to Liberia and wage war in Liberia. But since we
17:58:11 20 came, over three months now nobody had come to us, only those of
21 us here, and now the training is starting. But I said, Oh, Putu,
22 you see our group? We will enter Liberia. Why? Do you want to
23 die in exile? Would you make it? You are my own training mate.
24 And at that time we were over ten. We were all training mates,
17:58:44 25 those of us who trained with Putu. So I called them and told
26 them to come for a discussion, and we convinced him to join us.
27 Then Putu said he was afraid. Then I asked him why he was
28 afraid. Then he said because - Putu, he was a Military Police
29 like me before. He said, Because at one time I was on duty at

1 ELWA Junction when Samuel Kanyon Doe imposed a curfew from 6 to
2 6. At one time Mr Charles G Taylor was a major, because at that
3 time Samuel Kanyon Doe promoted all ministers and directors to
4 major and they were wearing uniforms. At that time Charles G
17:59:38 5 Taylor was major director for GSA. So Putu said he saw Mr Taylor
6 come with his car, and he halted the car, and the car failed to
7 stop, and he shot at the car's tyres. And when he went there, he
8 saw Major come down, and he was arrested and taken to the MP
9 headquarter, and from there he was dismissed from the army. So
18:00:04 10 he said he decided to go into exile in Ghana, so that was where
11 he came across Fahnbulleh, who recruited him. He said he was the
12 overall commander for the men. He said he was afraid now to come
13 and join the NPFL, of which Charles Taylor is the leader. And I
14 said, Look, forget it, my man. The man cannot remember what
18:00:28 15 happened. In fact, he doesn't even know you. Don't explain any
16 story. We are looking for manpower. I'll take you along. And
17 he said, Okay, but I have my two brothers with me. We are all
18 Liberians, so I cannot leave them and come alone. I'll bring
19 them so that we can join - I'll brainwash them and bring them so
18:00:54 20 that we can join the NPFL. That was how the group was
21 disorganised. And Putu came with his friend called Paul Nimley.
22 Q. And what happened to the rest of the MOJA group after Paul
23 Nimley and Putu crossed over to your group?
24 A. When we used to go to formation, now they will see them in
18:01:38 25 our group and I will tell: Look, if you know, we're all here to
26 train in order to wage war in our country. You'd better train to
27 go and fight in Ghana. You see our strength. We will accomplish
28 our mission. You're a foreigner. If you go to Liberia you will
29 not know who to kill. You will kill innocent people. So those

1 of us from Liberia, we know our target. And two weeks after they
2 disappeared from the base, and I did not know where they went to.
3 That was how they were disorganised.

4 Q. Two weeks after what happened did they disappear?

18:02:26 5 A. They disappeared from the base.

6 Q. You said two weeks after. Two weeks after what?

7 A. After getting Putu and the other men from amongst their
8 group, two weeks after that I did not see them again on the base.

9 JUDGE DOHERTY: Mr Chekera, before you move on to another
18:02:48 10 topic, I want to clarify who - the witness has described Putu's
11 attempts to stop a car, Mr Taylor came down, and he was arrested.
12 He was taken to the MP headquarters and he was dismissed from the
13 army. Now we've got two army people here --

14 MR CHEKERA: Yes, I see where you're pointing at, your
18:03:23 15 Honour. If you allow me to clarify.

16 JUDGE DOHERTY: Please do so.

17 MR CHEKERA:

18 Q. Mr Zaymay, you were explaining the time that Doe imposed a
19 curfew and Mr Taylor came with his car. Can you very briefly
18:03:40 20 tell us what happened when Mr Taylor came with his car after the
21 curfew?

22 JUDGE DOHERTY: I'm clear what happened and the attempted -
23 but who was the one arrested and who was the one dismissed?

24 MR CHEKERA: Yes:

18:03:54 25 Q. Now, who was arrested after that curfew and who was
26 eventually dismissed from his position in the army?

27 A. Military Police Putu S Major, he was assigned at the ELWA
28 Junction at an intersection. The curfew order was that no
29 civilian was to be outside at that time. In executing your

1 order, you were to be discretionary. So whilst Putu Major was on
2 post enforcing the curfew law, he saw a car coming with the
3 screens all wound up. Instead of stopping the car and asking,
4 Excuse me, sir, who was in the car - to identify who was in the
18:04:44 5 car, he did not do that. He opened fire at the tyres of the car
6 and punctured them, and later he knew that there was a major in
7 military uniform in the car and he was disembarking. And at that
8 time he stood at attention to salute, but it was late. But you
9 cannot arrest a major during curfew time. So he was arrested and
18:05:08 10 taken to MP headquarters for attacking a major - for opening fire
11 on a major's car.

12 PRESIDING JUDGE: Mr Witness, the question you were asked
13 was very simply: Who was arrested. Please don't repeat your
14 story. Who was arrested?

18:05:33 15 THE WITNESS: The Military Police Putu S Major was arrested
16 for opening fire on the major's car.

17 PRESIDING JUDGE: The major being Charles Taylor at the
18 time?

19 THE WITNESS: Yes, sir. Yes, sir.

18:05:45 20 PRESIDING JUDGE: Thank you.

21 MR CHEKERA: Thank you, Madam President:

22 Q. You have given us the total number of the Liberian group.
23 Were you able to ascertain the size of the Sierra Leonean group
24 when you were at Tajura?

18:06:09 25 A. The Sierra Leoneans were less. They were not even up to
26 50.

27 Q. And the Gambians?

28 A. The Gambians constituted the second largest number to the
29 Liberians. The Liberians constituted the largest number and the

1 Gambians were second, but they were less than 100. I'm just
2 estimating. I did not used to go amongst them actually, because
3 I just saw the group from afar. So I'm just estimating.

4 Q. And how were you able to gauge or estimate these sizes?

18:06:57 5 A. Because if you stood from a little bit of distance and you
6 saw a group of people, you would be able to estimate whether that
7 number is up to 50 or it is close to 100. You will only be
8 estimating, but you wouldn't know the exact figure.

9 Q. And where was it that you would see them all in one place?

18:07:25 10 A. In the morning we will go into a formation country by
11 country, and in the mess house - when we went to dine in the mess
12 house, the tables were all set in different corners. And in the
13 kitchen too, the kitchen was divided. When we went to the
14 kitchen, you will see the Liberian chief cook, and they will
18:07:57 15 stand in a queue to go for their food and the Sierra Leonean
16 chief cook, the Sierra Leoneans will stand in line to go for
17 food. The Ghanaian chief cook, and you will stand in line to go
18 for food. The Ghanaians would not stand in the Sierra Leonean
19 line to go and get their food. So it was obvious that within two
18:08:16 20 years' time you will be able to determine the strength of a group
21 because we interacted commonly, though I was not mostly concerned
22 about them.

23 Q. You talked about Foday Sankoh being a cook and making tea.
24 What were the cooking arrangements like at Tajura?

18:08:38 25 A. When we went for formation in the morning, they selected
26 five men from each group from amongst us the trainees. It was
27 only our commanders who did not go to the kitchen, but we had a
28 staff group. They had the commander, the deputy, those did not
29 go to the kitchen. But besides those, everybody else would go to

1 the kitchen. So when we went for formation, they would ask the
2 platoon leader to present two men each, from each group, that
3 will be up to five or six, and they will go and cook in the
4 kitchen. The Sierra Leonean - Nigerians would not cook for
18:09:28 5 Sierra Leoneans, nor would Ghanaians cook for Sierra Leoneans.
6 The Sierra Leoneans will give their own men. They will go to the
7 kitchen and cook. The Filipinos too will give their own men. So
8 that was how they were doing it. The commanders would not cook
9 for the floor men and the floor men were just elements down the
18:09:45 10 line.

11 Q. In your answer you said the Sierra Leoneans - did you say
12 Nigerians would not cook for Sierra Leoneans? Because that is
13 how it is recorded. Did you make reference to Nigerians?

14 A. No. It might have been a slip of tongue. Nigerians were
18:10:11 15 not there. The Ghanaians, Sierra Leoneans, the Senagambia, the
16 Filipinos, the Aceh Sumatra, the Latin Americans and even some
17 people from South Africa - I mean, Zimbabwe, yes, they were all
18 there.

19 JUDGE DOHERTY: Mr Chekera, I think the witness says Aceh
18:10:41 20 Sumatra, A-C-E-H. I noticed on two occasions it's been
21 incorrectly recorded.

22 MR CHEKERA: Thank you, your Honour, for the correction.

23 THE WITNESS: Aceh Sumatra.

24 MR CHEKERA:

18:10:59 25 Q. You have made reference to Cooper Teah and Augustine Wright
26 and you said they were our heads at the base. What was Cooper
27 Teah and Augustine Wright's position in relation to your group at
28 Tajura?

29 A. When we were in exile, Cooper Teah was living in Abidjan.

1 He came in with Quiwonkpa to invade Liberia. He was the acting
2 commanding general at that time at the brigade headquarters. So
3 when the coup failed, Cooper Teah made his way to Abidjan.
4 Cooper Teah, Isaac Musa, William Obai - no, Cooper Teah, Isaac
18:11:51 5 Musa, General Varney, they were the first people who went to the
6 base.

7 PRESIDING JUDGE: Stop, Mr Witness. The question asked of
8 you was: What was Cooper Teah and Augustine Wright's position in
9 relation to your group at Tajura? That is the question. Not in
18:12:13 10 Abidjan. At Tajura. If you know, what were their positions?

11 THE WITNESS: Cooper Teah was the first commander for us,
12 the base commander. And Augustine Wright was his deputy.

13 MR CHEKERA:

14 Q. You said Cooper Teah was the first commander. Was he
18:12:40 15 succeeded by anyone?

16 A. No, no, not Augustine Wright. Cooper Teah was the first
17 commander and Cooper Miller - no, not Cooper Teah. Cooper
18 Miller. Cooper Miller. It's a slip of tongue. Cooper Miller
19 was the first commander. Cooper Teah never went with us to the
18:13:08 20 base. Sorry. Cooper Teah never went with us to the base. Our
21 first commander was Cooper Miller.

22 Q. And was he succeeded by anyone?

23 A. Yes.

24 Q. Yes. Who succeeded him?

18:13:35 25 A. Isaac Musa, the second in command.

26 Q. And did Musa remain the commander at the base until you
27 left Tajura?

28 A. No. The last man was Moses Zeh Blah. He was the last who
29 took over command.

1 PRESIDING JUDGE: Now, I don't understand, Mr Chekera. The
2 witness says Cooper Miller was the first commander for us and
3 Augustine Wright was his deputy. Later you asked him who
4 succeeded Cooper Miller and he said Isaac Musa, the second in
18:14:21 5 command. I thought the second in command and deputy are one and
6 the same.

7 MR CHEKERA: Indeed. I could clarify from the witness:

8 Q. Cooper Miller, did he have a deputy?

9 A. Yes. Sorry, I said - I repeat it. It was a slip of
18:14:51 10 tongue. There were two Coopers. Cooper Teah did not enter with
11 us at the base. Cooper Miller. Cooper Miller's deputy was
12 Augustine Wright.

13 Q. And later when you talked about Isaac Musa, you said Cooper
14 Miller was succeeded by Isaac Musa who was the second in command.
18:15:13 15 Isaac Musa, before he took over from Cooper Miller, was he second
16 in command to Cooper Miller?

17 A. No.

18 Q. Okay. What was Isaac Musa's position before he took over
19 from Cooper Miller?

18:15:32 20 A. Isaac Musa was adviser to the commander before he came in
21 as our chief.

22 Q. Let's just be clear. Isaac Musa was adviser to the
23 commander. Which commander was he adviser to?

24 A. Isaac Musa was adviser to Cooper Miller whilst Augustine
18:16:09 25 Wright was the deputy to Cooper Miller. When Cooper Miller was
26 relieved - he was arrested and relieved and transferred, Isaac
27 Musa took over command. And from Isaac Musa, the last person who
28 took command before we departed was Moses Zeh Blah. Does that
29 make me clear?

1 PRESIDING JUDGE: Yes, thank you.

2 MR CHEKERA:

3 Q. Why was Cooper Miller relieved, arrested and transferred?

4 A. You know, at the base, those of us who came from Ni mba

18:17:06 5 dominated the - were in predominance. The other tribes were not

6 even up to ten. The rest of us were Gi o and Mano from Ni mba.

7 The first group that was recruited and moved to the base before

8 the second group, and when we - when we got there, those of us in

9 the second group, when I got there, there was a signal and there

18:17:33 10 was a rumour that the first group that first went had now

11 organised a government. They had now organised a government. So

12 I said, "But what form of government is that?" I had been in the

13 army before and I knew what a government - what form of

14 government might they have organised? So do you want to tell us

18:18:00 15 that these people brought us here to train us and give us over?

16 Where would they get the arms from? And it was later on that

17 information filtered in that the first group that came in had

18 organised their government and they had had a plan that - they

19 had a conspiracy at the base and that their plan was, after

18:18:32 20 entering into Liberia, they would attack our leader. And that

21 linked Cooper Miller, Augustine Wright and others.

22 Q. Just pause there, if you may. You said there was a rumour

23 that these people had formed a government. Where had they formed

24 a government and the government - what was the purpose of the

18:18:57 25 government that they had formed?

26 A. I don't know. It confused us.

27 Q. And you mentioned leader. Which leader were they going to

28 attack when you entered Liberia?

29 A. Charles G Taylor. That is when Charles G Taylor addressed

1 us before the training started, it was then that this thing came
2 up, that the first group that had come had already prepared that.

3 Q. And how did you hear about this or how do you know about
4 this?

18:19:42 5 A. I was a Military Police commander. Information came in.
6 And they started conducting arrest of people and I became
7 confused.

8 Q. Who started arresting people?

9 A. The S2 headed by William Obai. The intelligence section
18:20:13 10 headed by - the intelligence section that was headed by William
11 Obai, they started arresting people. And the MP commander was
12 confining the people. There was tension.

13 Q. Who was the MP commander confining people?

14 A. I, T Zaymay.

18:20:41 15 Q. And who did you confine?

16 A. Augustine Zammay, Charles Touwon, and many other people,
17 but these are the names I recall. And many others.

18 MR CHEKERA: Madam President, the spelling I have for
19 Charles Touwon is T-O-U-W-O-N:

18:21:41 20 Q. On what basis did you confine these people?

21 A. There was a conspiracy that they were a part of and they
22 were to be confined pending investigation.

23 Q. Was there an investigation?

24 A. Yes, an investigation was set up.

18:22:10 25 Q. What was the nature of the investigation that was set up?

26 A. A court martial board was set up to investigate by
27 hierarchy.

28 Q. And who were on court martial board?

29 A. William Obai headed the court martial board.

1 Q. And you said it was set up by the hierarchy. Who set up
2 the court martial board?

3 A. The person who was in command by then was Isaac Musa and it
4 was during Isaac Musa's administration.

18:23:01 5 Q. And what happened when the court martial board was set up?

6 A. Well, when they set up the court martial board, those men
7 were still in confinement and the head of the group had been
8 arrested and taken away, so those men remained in jail. But
9 before our departure, they were released and we moved. The court

18:23:43 10 martial board recommended that those men were to be released
11 since their head had been relieved and transferred they will be
12 powerless and that they were to be surveillanced. So the men
13 were released and we continued the journey. They were then
14 released and they joined us to move into Liberia.

18:24:04 15 Q. Let's just pause there. You said the head of the group had
16 been arrested and taken away. Who was arrested and taken away?

17 A. Cooper Miller and Augustine Wright. They were the heads of
18 the group. They were arrested and taken away and that meant that
19 the rest of the men would be powerless and that they were to be
20 released but constantly surveillanced. Then we moved. That was
21 recommended by the court martial board.

22 PRESIDING JUDGE: Mr Chekera, Cooper Miller and Augustine
23 Wright, are these the people that were relieved and transferred?

24 MR CHEKERA: That's what I'm trying to clarify.

18:25:02 25 PRESIDING JUDGE: And, if so, transferred where?

26 MR CHEKERA: Yes:

27 Q. Now, Augustine Wright and Cooper Miller, you said they were
28 arrested and taken away. Where were they taken away to?

29 A. I don't know. Whether they were taken to Tajura or the

1 highest headquarters or where else I did not know, but when I
2 asked Isaac Musa he said he did not know where they were taken
3 to.

18:25:45 4 Q. Was this after or before the court martial board was set
5 up?

6 A. The court martial board was set up and the people were
7 investigated and after one day they were taken to there. They
8 were not confined. It was only the other men who were confined.

18:26:10 9 PRESIDING JUDGE: And is it our understanding that this
10 court martial, this whole inquiry and everything, took place at
11 the camp at Tajura?

12 MR CHEKERA: I'm hoping to get there once I clarify the
13 issue that was outstanding:

18:26:33 14 Q. Mr Zaymay, let's just be clear. Cooper Miller and
15 Augustine Wright were taken away to an unknown destination. In
16 the conspiracy were there other men involved other than the two?

17 A. Yes, those who were part of the plan were those who were
18 again confined.

18:27:05 19 Q. Where were they confined, those people other than Cooper
20 Miller and Augustine Wright? Where were they confined?

21 A. Within the same building in which the Liberians were
22 living. There was a bathroom there, a big bathroom like this
23 place. We used that as a cell and within that same building a
24 small room was taken to be an office. That same building in
18:27:31 25 which the Liberians were living.

26 Q. Were they also taken before the court martial board?

27 PRESIDING JUDGE: Were who also taken?

28 MR CHEKERA: The persons who were confined in the cell:

29 Q. The persons that you're referring to who were confined in

1 the cell, were they also taken before the court martial board?

2 PRESIDING JUDGE: The witness testified that they were the
3 ones taken before court martial, the very ones that were
4 confined.

18:28:03 5 MR CHEKERA:

6 Q. Now, the court martial board, where was the court martial
7 conducted?

8 A. Within the same Liberian building. Within the same
9 Liberian building. That was where the court martial board was
10 set. Augustine Wright and Cooper Miller were tried that same day
11 and from there they were shipped out of the camp to an unknown
12 destination and the others who remained and who were also
13 involved, they were confined at the MP headquarters. They were
14 tried and after the trial the recommendation from the board was
15 that since the heads of these men have been arrested and taken
16 away they would be powerless, so these men should be released and
17 put on board and they should be ready with us to move on for
18 combat. So that was what we did. They were released and they
19 came on board and we all left for Liberia. Those who were
18:28:44 20 confined, they were released and put on parole and we moved.

21 Q. All the persons who appeared before the court martial
22 board, do you know whether they were given an opportunity to
23 defend themselves before the board?

24 A. Yes.

18:29:33 25 Q. You said they were tried. Do you know how --

26 PRESIDING JUDGE: So what does yes mean?

27 MR CHEKERA:

28 Q. The persons who were taken before the court martial board,
29 were they given an opportunity to defend themselves?

1 A. Yes, those men explained themselves that they were innocent
2 of what they were talking about. They never joined any group to
3 attack the leader that was trying to liberate them. They
4 explained. And they were re-confined. And later the court
18:30:23 5 martial board gave a recommendation that they were to be put on
6 parole. Those who were confined were to be put on parole.

7 PRESIDING JUDGE: Anyway, Mr Chekera, it would appear we
8 have come to the end of the tapes. But I think before we do
9 adjourn there is a mistake on the record that I hope will be
18:30:45 10 picked. The witness said these men were released and put on
11 parole. Now that appears as patrol and I hope that is corrected
12 in the final version.

13 Mr Witness, we have come to the end of the day's
14 proceedings. We are going to adjourn to tomorrow afternoon at
18:31:12 15 2.30. Now in the meantime you are not to discuss your evidence
16 with anyone. Is that clear, sir?

17 THE WITNESS: Yes, sir. Yes, sir, I have been told
18 already.

19 PRESIDING JUDGE: Court proceedings are adjourned to
18:31:34 20 tomorrow at 2.30.

21 [Whereupon the hearing adjourned at 6.31 p.m.
22 to be reconvened on Friday, 7 May 2010 at
23 2.30 p.m.]

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I N D E X

WITNESSES FOR THE DEFENCE:

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EXAMINATION-IN-CHIEF BY MR CHEKERA	40546