

Trial Hearing
WITNESS: CIV-OTP-P-0483

(Open Session)

ICC-02/11-01/15

1 International Criminal Court
2 Trial Chamber I
3 Situation: Republic of Côte d'Ivoire
4 In the case of The Prosecutor v. Laurent Koudou Gbagbo and Charles Blé Goudé
5 ICC-02/11-01/15
6 Presiding Judge Cuno Tarfusser, Judge Geoffrey Henderson and Judge Olga
7 Herrera-Carbuccia
8 Trial Hearing - Courtroom 1
9 Tuesday, 15 November 2016
10 (The hearing starts in open session at 9.35 a.m.)
11 THE COURT USHER: [9:35:55] All rise.
12 The International Criminal Court is now in session.
13 Please be seated.
14 PRESIDING JUDGE TARFUSSER: Good morning. Good morning to everybody in the
15 court, in the public gallery. Good morning also to you, Mr Witness, and to you, Counsel
16 Odum.
17 We are here for this first day of questioning of the witness. And before starting the
18 questioning of the witness, I have to give some information to the witness and identify the
19 witness, et cetera, and then give the floor first to the Prosecutor and then to the other
20 parties.
21 So, Mr Witness, your name is Jerome Wally Tarlue Junior; is this correct? You have to
22 switch the microphone on. You have to switch the microphone on. Yes. Okay.
23 WITNESS: CIV-OTP-P-0483
24 (The witness speaks Liberian English)
25 THE WITNESS: [9:37:53] Yes.

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- 1 PRESIDING JUDGE TARFUSSER: You do understand in English, right?
- 2 THE WITNESS: [9:37:59] Yes.
- 3 PRESIDING JUDGE TARFUSSER: [9:38:03] What is your date of birth? When were
- 4 you born?
- 5 THE WITNESS: [9:38:09] (Interpretation) January 1st, 1979.
- 6 PRESIDING JUDGE TARFUSSER: [9:38:19] And where?
- 7 THE WITNESS: [9:38:21] (Interpretation) I was born in Camp Todee.
- 8 PRESIDING JUDGE TARFUSSER: [9:38:26] Which is in which country?
- 9 THE WITNESS: [9:38:30] (Interpretation) In Liberia.
- 10 PRESIDING JUDGE TARFUSSER: [9:38:32] And you're a Liberian citizen?
- 11 THE WITNESS: [9:38:38] (Interpretation) Yes.
- 12 PRESIDING JUDGE TARFUSSER: [9:38:39] What is your current occupation?
- 13 THE WITNESS: [9:38:42] (Interpretation) Well, for the moment I'm not working.
- 14 PRESIDING JUDGE TARFUSSER: [9:38:48] So now some other information to put you
- 15 at ease:
- 16 The Chamber has been informed that you need reading assistance.
- 17 THE WITNESS: [9:39:07] (Interpretation) Yes.
- 18 PRESIDING JUDGE TARFUSSER: [9:39:08] And obviously the Chamber has
- 19 authorised this measure. And you can rest --
- 20 THE WITNESS: [9:39:14] (Interpretation) Uh-huh.
- 21 PRESIDING JUDGE TARFUSSER: [9:39:17] -- that you will receive all assistance you will
- 22 need during the testimony in this context.
- 23 THE WITNESS: [9:39:28] (Interpretation) Okay. No problem.
- 24 PRESIDING JUDGE TARFUSSER: [9:39:30] Thank you.
- 25 Second, you have been assigned a lawyer which is sitting near you --

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1 THE WITNESS: [9:39:40] Uh-huh.

2 PRESIDING JUDGE TARFUSSER: [9:39:42] -- to provide you with legal assistance about
3 possible self-incrimination.

4 THE WITNESS: [9:39:50] (Interpretation) Yes.

5 PRESIDING JUDGE TARFUSSER: [9:39:57] The Prosecutor has indicated that Rule 74,
6 as we call it assurances, were appropriate in your case because of the possibility of
7 self-incrimination.

8 THE WITNESS: [9:40:11] (Interpretation) Uh-huh.

9 PRESIDING JUDGE TARFUSSER: [9:40:12] So Mr Odum is present with you, and if
10 any concern arises in the course of your testimony, he will be able to advise you and to
11 raise concerns with the Chamber in this respect.

12 The Chamber in any case gives you the assurance, pursuant to Rule 74(3), that your
13 testimony will not be used either directly or indirectly against you in any subsequent
14 proceedings by this Court, except under Article 70 and 71, which are the offences against
15 the Court if you do not say the truth.

16 Accordingly, if any question is asked that could lead to your self-incrimination, we will
17 hear your answer in private session any keep this answer confidential. Private session
18 means that we inside can only hear, nobody else.

19 The party who is questioning you is, in any case, responsible for requesting private
20 session prior to asking questions which may lead you to incriminate yourself, and
21 obviously counsel is always alert to intervene if he deems it appropriate. Have you
22 understood?

23 THE WITNESS: [9:42:15] I understand (Interpretation) Yes, I do understand.

24 PRESIDING JUDGE TARFUSSER: [9:42:20] So now we have another issue which is
25 related to the interpretation.

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- 1 THE WITNESS: [9:42:30] Uh-huh.
- 2 PRESIDING JUDGE TARFUSSER: [9:42:31] When you are speaking, and you will be
3 testifying in Liberian English.
- 4 THE WITNESS: [9:42:37] (Interpretation) Yes.
- 5 PRESIDING JUDGE TARFUSSER: [9:42:39] And we need to ensure that we all hear,
6 understand your answers so as you understand our questions.
- 7 THE WITNESS: [9:42:53] (Interpretation) Okay.
- 8 PRESIDING JUDGE TARFUSSER: [9:42:56] In order to do so, we need the help of
9 interpreters.
- 10 THE WITNESS: [9:43:02] (Interpretation) Uh-huh.
- 11 PRESIDING JUDGE TARFUSSER: [9:43:07] Therefore, it is very important that you
12 speak slowly.
- 13 THE WITNESS: [9:43:11] Uh-huh.
- 14 PRESIDING JUDGE TARFUSSER: [9:43:12] Like I am speaking slowly with you and
15 that you speak clearly into the microphone when it is open and the red light is on, like it is
16 now.
- 17 THE WITNESS: [9:43:31] (Interpretation) Uh-huh.
- 18 PRESIDING JUDGE TARFUSSER: [9:43:33] And this to assure to the interpreters and
19 the court reporters the correct interpretation and transcribing of what you're saying.
20 Now we come to your testimony.
- 21 THE WITNESS: [9:43:53] Uh-huh.
- 22 PRESIDING JUDGE TARFUSSER: [9:43:54] This Chamber has been established to try
23 the case of the Prosecutor against Mr Gbagbo and Mr Blé Goudé. And I think you are
24 aware of this.
- 25 THE WITNESS: [9:44:12] Uh-huh.

- 1 PRESIDING JUDGE TARFUSSER: [9:44:13] You are here to assist us and to assist the
2 Chamber in the finding of the truth.
- 3 THE WITNESS: [9:44:22] (Interpretation) Yes.
- 4 PRESIDING JUDGE TARFUSSER: [9:44:24] You will be asked questions first by the
5 Office of the Prosecutor, then by the Defence of Mr Gbagbo and Mr Blé Goudé and, if
6 need be, also by the Judges.
- 7 If at any point you have concerns, you would like a break, you are tired, you just tell me
8 and we will try to accommodate your concerns.
- 9 THE WITNESS: [9:45:03] (Interpretation) Okay.
- 10 PRESIDING JUDGE TARFUSSER: [9:45:06] Now, and before giving the floor to the
11 Office of the Prosecutor, you have to make a solemn undertaking by law.
- 12 And I will ask you, I ask you to speak out the words I'm telling you, to repeat the words
13 I'm telling you. It is a solemn undertaking that you are engaging with in order to tell the
14 truth.
- 15 THE WITNESS: [9:45:39] Okay.
- 16 PRESIDING JUDGE TARFUSSER: [9:45:40] So please repeat with me. So please
17 repeat with me. I solemnly declare.
- 18 THE WITNESS: [9:45:48] (Interpretation) I solemnly declare.
- 19 PRESIDING JUDGE TARFUSSER: [9:45:51] That I will speak the truth.
- 20 THE WITNESS: [9:45:55] (Interpretation) I will speak the truth.
- 21 PRESIDING JUDGE TARFUSSER: [9:46:00] The whole truth.
- 22 THE WITNESS: [9:46:01] (Interpretation) The whole truth.
- 23 PRESIDING JUDGE TARFUSSER: [9:46:05] And nothing but the truth.
- 24 THE WITNESS: [9:46:09] (Interpretation) And nothing but the truth.
- 25 PRESIDING JUDGE TARFUSSER: [9:46:12] The last thing I have to tell you is, as I said

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1 before, not saying the truth is an offence against the Court and as such --

2 THE WITNESS: [9:46:23] Okay.

3 PRESIDING JUDGE TARFUSSER: [9:46:26] -- is punishable. Okay.

4 THE WITNESS: [9:46:30] Okay.

5 PRESIDING JUDGE TARFUSSER: [9:46:32] I think now we are ready for the
6 questioning, and I give the floor to the Office of the Prosecutor, Ms Pack, I think.

7 MS PACK: [9:46:42] Thank you, Mr President, your Honours. Good morning.

8 QUESTIONED BY MS PACK:

9 Q. [9:46:47] Good morning, Mr Tarlue. My name is Ms Pack. We met now a couple
10 of weeks ago. I'm going to ask you questions for the Prosecution.

11 A. [9:46:58] Okay.

12 Q. [9:47:01] Now, I hope you've had a rest from your journey.

13 A. [9:47:09] Mm-hmm.

14 Q. [9:47:09] Good. I'm going to try and speak as slowly as I can so the interpreters
15 can interpret for you.

16 A. [9:47:21] Okay.

17 Q. [9:47:22] And sometimes I may need to indicate to you to slow down or to stop if
18 your evidence isn't being captured by the interpreters, in which case I may raise my hand
19 like this. I mean no disrespect by that, but just to say to slow down or stop so they can
20 get your evidence, okay?

21 A. [9:47:50] Okay, no problem.

22 Q. [9:47:58] And I should say also good morning to your legal representative,
23 Mr Odum.

24 Now, Mr Tarlue, I'm just going to ask you about some background first, some background
25 matters.

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- 1 A. [9:48:12] Okay.
- 2 Q. [9:48:13] Let me start with this, this one.
- 3 Do you have an alias that you are known by?
- 4 A. [9:48:26] Yes.
- 5 Q. [9:48:28] What is your alias?
- 6 A. [9:48:35] Are you asking for my traditional name or what name are you asking for?
- 7 Q. [9:48:40] So you can tell us your traditional name, and then you can tell us any
- 8 other names. So let's start, traditional name?
- 9 A. [9:48:52] Nimeon.
- 10 Q. [9:48:53] And that's your name in Liberia?
- 11 A. [9:48:56] It's my traditional name that was given to me by my late parents.
- 12 Q. [9:49:02] Do you have another name that you are known by?
- 13 A. [9:49:10] That's the only name that I carry.
- 14 Q. [9:49:14] Do you give yourself another name?
- 15 A. [9:49:23] No. From my family I have no other name but Tarlue Junior, Tarlue
- 16 Junior or Junior Gbagbo.
- 17 Q. [9:49:35] You said Junior Gbagbo?
- 18 A. [9:49:38] Yes.
- 19 Q. [9:49:39] The name Junior Gbagbo, how did you get that name?
- 20 A. [9:49:48] Well, well, it was when I was in Ivory Coast. At that time I was
- 21 working --
- 22 THE INTERPRETER: [9:50:00] Mr President, could counsel ask the witness to slow
- 23 down a little bit.
- 24 PRESIDING JUDGE TARFUSSER: [9:50:06] You're hearing the same I hear, okay. So
- 25 thank you.

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1 MR ODUM: You have to go much more slowly.

2 MS PACK: [9:50:14]

3 Q. So I'm just asking you -- I've just heard the interpreters say just to slow down, just
4 take it slowly, we have enough time, so they can interpret for you, okay?

5 Can we try that again? I don't think it was captured. Can we try that again, Your
6 Honours?

7 THE WITNESS: (Interpretation) [9:50:33] Okay. I said when I left Liberia in 1990,
8 when I went to Ivory Coast, by then it was Bédié time. I took that name because when
9 the politics started, I later heard about Gbagbo, and that was when I took that name. It
10 was a name that I liked, so I decided to take the name.

11 Q. [9:51:02] Okay.

12 PRESIDING JUDGE TARFUSSER: [9:51:03] May I? There is one word which was
13 absolutely inaudible and as such it is written also on the record.

14 MS PACK: [9:51:12] Bédié. Bédié was the word I think.

15 PRESIDING JUDGE TARFUSSER: [9:51:18] By then it was ... time.

16 MS PACK: [9:51:20] Bédié.

17 PRESIDING JUDGE TARFUSSER: Okay.

18 MS PACK:

19 Q. So let me just check that you said that.

20 You said "By then in 1990 it was Bédié time." You mean the President Bédié?

21 A. [9:51:29] Well, okay. 1990 was Houphouët-Boigny's time.

22 Q. Boigny, sorry.

23 A. Bédié came later after him.

24 Q. [9:51:38] So it was Boigny's time, not Bédié's time when you went to Côte d'Ivoire?

25 A. [9:51:46] I said it was at Houphouët-Boigny's time that I went to Ivory Coast.

- 1 Before I -- I was actually able to know myself, it was Houphouët-Boigny time. That was
2 the time I travelled to the Côte d'Ivoire.
- 3 Q. [9:52:07] Where did you go to in Côte d'Ivoire?
- 4 A. [9:52:15] I was living in Ditroudra-Béoué.
- 5 Q. [9:52:25] And which part of Côte d'Ivoire? Was it west? Was it east?
- 6 A. [9:52:28] It was in the west.
- 7 Q. [9:52:32] What were the nearest big towns to where you were living in
8 Côte d'Ivoire?
- 9 A. [9:52:48] It was you go to Zagne and Zagne was in that area.
- 10 THE INTERPRETER: [9:52:55] Mr President, could the witness again be asked to talk
11 into the mic.
- 12 PRESIDING JUDGE TARFUSSER: [9:53:00] Two things: Talk to the microphone or
13 put the microphone closer to your mouth.
- 14 THE WITNESS: [9:53:08] Okay.
- 15 PRESIDING JUDGE TARFUSSER: [9:53:10] And speak, again, try to speak slowly.
16 Think about other people working. Okay. Please, slower, clearer. Thank you.
- 17 MS PACK: [9:53:34]
- 18 Q. Now you mentioned a location just then. You said the town, I think you said the
19 town of Zagne; is that right?
- 20 A. [9:53:44] Yes.
- 21 Q. [9:53:44] And were there other towns nearby?
- 22 A. [9:53:50] Yes. From Ditroudra-Béoué, we had -- we had Ditroudra-Béoué (Speaks
23 English), and we have Paris-Léona, we have Cligee (phon), we have Zlou (phon) before
24 you can get to Zagne.
- 25 Q. [9:54:06] Let's take that slowly, okay.

- 1 A. [9:54:09] Okay.
- 2 Q. [9:54:10] So we start with Ditroudra-Béoué.
- 3 A. [9:54:16] Yes.
- 4 Q. [9:54:17] And the other towns slowly, one by one.
- 5 A. [9:54:24] Paris-Léona.
- 6 Q. [9:54:26] Okay. Paris-Léona?
- 7 A. [9:54:36] Yes.
- 8 Q. [9:54:40] The next one?
- 9 A. [9:54:46] We have Koulili (phon).
- 10 Q. [9:54:51] Koulili?
- 11 A. [9:54:52] Yes.
- 12 Q. [9:54:52] And also another one?
- 13 A. [9:54:56] Zlou.
- 14 Q. [9:55:06] And the last one?
- 15 A. [9:55:07] Zagne.
- 16 Q. [9:55:14] Now, let's backtrack a bit.
- 17 A. [9:55:18] Okay.
- 18 Q. [9:55:19] Why did you go from Liberia to Côte d'Ivoire at this time? Why did you
- 19 move?
- 20 A. [9:55:29] Well, we have a relationship. Those who live in the lower Côte d'Ivoire,
- 21 they -- like in Grand Gedeh, Liberia, they are almost the same people.
- 22 Q. [9:55:42] Let's take it -- those names again. So you say those who live in which
- 23 part of Côte d'Ivoire? Which part?
- 24 A. [9:55:53] Lower part, the lower part of Côte d'Ivoire.
- 25 Q. [9:55:56] I think you said the west. You say "l'ouest" in French. So it's the west;

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1 is that what you meant?

2 A. [9:56:05] I am not saying the west. I'm saying the lowest, the lowest.

3 Q. [9:56:13] The lowest part of Côte d'Ivoire, okay.

4 And then you were talking about in Liberia, was it Grand Gedeh you were talking about?

5 A. [9:56:23] Yes.

6 Q. [9:56:23] And that is a county in Liberia?

7 A. [9:56:31] It is also the lowest part of Liberia, just as that area I'm talking about in
8 Côte d'Ivoire is the lowest part of Côte d'Ivoire. So from -- we had our own area. So
9 when it came to the refugee time, we had our own refugee camp in that area. We
10 already had our families in that area, so when you got there in the Côte d'Ivoire from
11 Liberia, you move straight to your own family.

12 Q. [9:57:02] Okay. And in Liberia --

13 MR O'SHEA: [9:57:03] Sorry, just a moment, please. Your Honours, if names could
14 please be spelt so they go on to the transcript, because we're finding it difficult to go back
15 and verify things.

16 PRESIDING JUDGE TARFUSSER: [9:57:16] I was just asking counsel sitting near him
17 sometimes to pull the arm in order to alert the witness to speak slower, so to give me
18 support in this.

19 And the second thing is that I would like, if you say names, try to say them in a way that
20 they can be listened and written down properly. If they're complicated, please spell
21 them, okay? Thank you very much.

22 THE WITNESS: [9:57:48] (Interpretation) Okay.

23 MS PACK: We have given a list of names to the interpretation unit, but I will also spell
24 what I can so that it makes it to the transcript now with your Honour's leave.

25 PRESIDING JUDGE TARFUSSER: [9:58:02] Yes, of course. The first speller should be

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1 the witness and then the Prosecutor. We try to get it from him.

2 MS PACK: [9:58:16] Yes.

3 Q. But let me just clarify that, Mr Tarlue, because we just want to make sure if you can
4 spell. I understand, can you read and write? Is that something you can do?

5 A. [9:58:29] No.

6 Q. [9:58:30] Okay. How many years were you at school for?

7 A. [9:58:36] Well, I just went to school for three years and I stopped in the second
8 grade, then I left.

9 Q. [9:58:43] Okay. Now you've told us you are -- about Grand Gedeh in Liberia. I'll
10 spell that. Grand, G-R-A-N-D. Gedeh.

11 A. [9:58:58] Okay.

12 Q. [9:58:59] G-E-D-E-H.

13 You, your family, you were born in which area of Liberia?

14 A. [9:59:20] My parents came from Komasan (phon). That was their own town. But
15 I was born, but I was born in Camp Todee, opposite the barracks, because my father was a
16 soldier.

17 Q. [9:59:42] He was -- Camp Todee, you said? And that's T-O-D-E-E?

18 A. [9:59:48] Yes, it is a barracks, a military barracks.

19 Q. [9:59:51] That's in which part of Liberia? It doesn't matter if you don't remember.
20 No problem.

21 A. [9:59:59] Okay, okay, okay.

22 Q. [10:00:04] I can spell T-O-D-E-E. I think it's made it to the record.

23 Now, your family, you said, were from a village. Can you tell us just the nearest town to
24 where your family are from in Liberia, the nearest big town?

25 A. [10:00:23] Yes, the town is Komasan. It's a village. But the main town is Zwedru.

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1 That is the area of in the main town of Grand Gedeh.

2 Q. [10:00:35] Okay. So the town was Zwedru, which is Z-W-E-D-R-U. And it is in
3 Grand Gedeh in Liberia?

4 A. [10:00:47] Yes, yes.

5 Q. [10:00:48] Now, just another little background matter that I want to ask you. Your
6 ethnicity is what?

7 A. [10:00:59] I'm from the Tchien.

8 Q. [10:01:05] Is there another name for the Tchien?

9 A. [10:01:12] No, there is no other name for Tchien. That is the first tribe that lived in
10 that area, the capital city of Grand Gedeh.

11 Q. [10:01:23] So Tchien is T-'-C-H-I-E-N. And you talked about Zwedru again.

12 A. [10:01:35] The Tchien is in my dialect, it is in my dialect. But Tchien itself is a
13 tribe. It is not a town nor is it a city. It is my tribe.

14 Q. [10:01:48] And in Liberia, what languages do you speak?

15 A. [10:01:55] I speak Tchien. That is what I am saying. The Tchien people are in
16 Zwedru and Zwedru is our town. We live there with the Krahn people. And my own
17 town where I was born is Komasan.

18 Q. [10:02:11] You mentioned also the Krahn people. That's K-R-A-H-N, yes?

19 A. [10:02:23] Yes.

20 Q. [10:02:23] And is your people, the Tchien people, are they related to the Krahn
21 people?

22 A. [10:02:34] We have Krahn. We have the Tchien. If you want to name the
23 language of the Krahn people in Liberia, you must ask for us, for the Tchien, the --

24 THE INTERPRETER: Your Honour, the last two tribes that were referred to by the
25 witness were not very clear to the interpreter. Could he go over that please?

1 MS PACK:

2 Q. [10:02:58] So do you say that, just tell us, you're talking about the language that
3 you speak and the Krahn people speak, just say that again please.

4 A. [10:03:10] Do you mean if I do speak it?

5 Q. [10:03:12] Yes. And take it slowly, because it's difficult sometimes to hear, so take
6 it very slowly.

7 A. [10:03:19] Okay.

8 Q. [10:03:30] So I don't know, did you just tell us then the names of your --

9 A. [10:03:36] My country's name, my area's name is Goula Wédé (phon).

10 Q. [10:03:43] And you speak what language? You and your people speak what
11 language?

12 A. [10:03:50] That is the dialect I am speaking now, Tchien.

13 Q. [10:03:54] And is it the same as Krahn or different?

14 A. [10:04:04] We have Tchien, we have Krahn, but we do understand one another,
15 because if you do speak Tchien, you can also understand Krahn.

16 If the Krahn speak, the Tchien can understand; and if the Tchien speak, the Krahn would
17 understand. The only thing is there is an accentual difference or dialect difference, but it
18 is almost the same language.

19 Q. [10:04:28] Now, you mentioned earlier that you went over to Côte d'Ivoire?

20 A. [10:04:35] Yes.

21 Q. [10:04:36] You say you had family in Côte d'Ivoire when you went over there, is
22 that right?

23 A. [10:04:43] Yes.

24 Q. [10:04:45] And you said also something about the same people in that part of
25 Côte d'Ivoire that you went to. What do you mean, the same people as the people in

- 1 Liberia? You mean they were the same people in Côte d'Ivoire as in Liberia on that side?
- 2 A. [10:05:04] Yes, because we had a relationship because we -- Ivory Coast had Krahn
3 and Liberia has Krahn. And there is Gio in Côte d'Ivoire, and there is Gio in Liberia.
4 We do understand one another. But under normal circumstances --
- 5 Q. [10:05:22] Pause a bit. We take those names again.
- 6 A. [10:05:26] Yes.
- 7 Q. [10:05:26] So you said in Côte d'Ivoire they have Krahn, and Liberia they have
8 Krahn. And then you said also there was another group called Gio, which is G-I-O.
- 9 A. [10:05:39] Yes, yes.
- 10 Q. [10:05:40] Do you say you have that group also in Côte d'Ivoire and also in
11 Liberia?
- 12 A. [10:05:46] Yes.
- 13 Q. [10:05:47] And Gio is in which part of Liberia, do you know?
- 14 A. [10:05:55] They are in Nimba, Ganta (phon), and that is on the Liberian side. And
15 in the Ivory Coast area they are Danané and going as far as some other places.
- 16 Q. [10:06:09] Okay. So I got one name, Nimba, N-I-M-B-A, in Liberia?
- 17 A. [10:06:17] Okay.
- 18 Q. [10:06:18] And I got another name in Ivory Coast, Danané, D-A-N-A-N-É.
- 19 A. [10:06:21] Yes.
- 20 Q. [10:06:43] I think we are being told to slow down considerably, so we try now to
21 slow down between the questions and the answers.
- 22 A. [10:06:53] Okay.
- 23 Q. [10:07:06] Now, after you went to Côte d'Ivoire --
- 24 A. [10:07:10] Yes.
- 25 Q. [10:07:13] -- at the time you went, were you still a child?

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1 A. [10:07:22] Yes, I was. By then I was very young, about 15 years old, between 14,
2 15, something like that.

3 Q. [10:07:32] At one point did you move to a town called Guiglo, which is
4 G-U-I-G-L-O in Côte d'Ivoire?

5 A. [10:07:43] I went to Guiglo during -- when they had the -- when they had a border
6 problem between the two countries, that was the time I went to Guiglo.

7 Q. [10:08:02] When there was a border problem between Liberia and between what?

8 A. [10:08:06] Yes, yes, yes, and between Liberia and Ivory Coast.

9 Q. [10:08:11] And the border problem, what was the border problem? What do you
10 mean?

11 A. [10:08:17] Well, it was between the government of Liberia and the government of
12 Côte d'Ivoire. And we did not understand by then. That was around 1995. So and
13 that was the area where they had created the refugee camp.

14 Q. [10:08:37] Who created the refugee camp?

15 A. [10:08:43] The United Nations.

16 Q. [10:08:44] Did you go there with your family?

17 A. [10:08:49] Yes.

18 Q. [10:08:51] Did you work there also?

19 A. [10:08:57] Yes, I worked along with --

20 Q. [10:09:08] Who else was in the refugee camp, what people? Where were they from?

21 A. [10:09:13] They were Liberians, because that was the refugee camp that was in the
22 area, because when we came initially we did not have a refugee camp. There was
23 already a cross-border problem between the two countries. And then the United Nations
24 was asking for us to get a refugee camp in Ivory Coast, because no matter what happened
25 between those two countries and the two borders, everybody had a cross-border family

1 relationship.

2 Q. [10:09:47] So what you say is a cross-border problem, this was fighting between the
3 two sides?

4 A. [10:09:56] Yes, they even had people who were killed by then. So the UN was a
5 little bit afraid that they were trying to move the people from those areas and get them
6 back to the areas where they came from.

7 Q. [10:10:15] And you, did you have a refugee card?

8 A. [10:10:23] Yes, when the refugee day came, I registered and I happily received a
9 card.

10 Q. [10:10:31] At one point did you work, have a job in Guiglo?

11 A. [10:10:41] You mean in Guiglo?

12 Q. Yes.

13 A. Yes. Before I was -- I was in Guiglo sometimes, and sometimes I will brush around
14 the areas and that was the thing I was doing.

15 Q. [10:10:58] Do you know the name Sam Etiassé?

16 A. [10:11:03] What?

17 Q. Sam Etiassé.

18 A. [10:11:09] Sam, before I knew Sam Etiassé was when we had the refugee camp,
19 because sometimes he was -- they preferred the Guiglo, and sometimes he would come to
20 the camp, and he will ask me to invite youths to brush the area, and that was the time I
21 knew him.

22 Q. [10:11:31] And just for the spelling of Etiassé, it is E-T-I-A-S-S-É.

23 And you said I think, let me just check with you, you said he was the préfet?

24 A. [10:11:45] Yes, at that he was, yes, at that time.

25 Q. [10:11:49] Do you know the ethnicity of Sam Etiassé?

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1 A. [10:11:55] No, I did not know his tribe.

2 Q. [10:12:01] And do you know in the area of Guiglo, do you know the ethnicity of
3 the Ivorian people in that area?

4 A. [10:12:17] Yes, they were our family, they were Krahn. We, we spoke the same
5 language.

6 Q. [10:12:30] By "the same language", you don't mean French, you mean Krahn
7 language?

8 A. [10:12:35] I am talking about Krahn.

9 Q. [10:12:42] And you think of the town Guiglo, and then you go west to the border
10 with Liberia just along a line, and the town to the most closest to Liberia, you remember
11 its name?

12 A. [10:13:03] The town closer to Liberia, we had Devil zone (phon), because those of
13 us in the middle parts of the Krahn area, which is Zwedru, we had Toetown, we had BIE
14 and all of those places.

15 Q. [10:13:23] You know Toulé --

16 A. [10:13:23] Yes.

17 Q. [10:13:24] You know Toulépleu?

18 A. [10:13:31] Yeah, I know Toulépleu.

19 Q. [10:13:33] And that is on the border with Liberia? It's in Côte d'Ivoire on the
20 border?

21 A. [10:13:35] It is a little farther from the border, because you will have to go first to
22 Peka (phon), you will be in Peka and see inside of Liberia.

23 Q. I can spell Toulépleu, but I can't spell the other place, so we have to leave it as a
24 phonetic spelling. Toulépleu is T-O-U-L-É-P-L-E-U.

25 Now let me just go back to this camp where you were?

- 1 A. [10:14:14] Okay.
- 2 Q. [10:14:16] You were there for a time. At one point did you move to Abidjan?
- 3 A. [10:14:28] You mean when I was in Guiglo when I moved to Abidjan?
- 4 Q. [10:14:32] After Guiglo you moved to Abidjan?
- 5 A. [10:14:36] Yes.
- 6 Q. [10:14:38] Do you remember when approximately?
- 7 A. [10:14:44] No, no, I do not recall the time.
- 8 Q. [10:14:47] Do you remember who was president in Côte d'Ivoire when you went to
- 9 Abidjan?
- 10 A. At that time it was Bédié's time.
- 11 Q. [10:15:04] And what about over in Liberia, do you remember who was president
- 12 then, around the time you moved to Abidjan?
- 13 A. [10:15:12] It was Charles Taylor.
- 14 MS PACK: [10:15:18] I think my friends could agree, just to get the date, that that
- 15 would be in 1997. But I don't know whether my friends will agree the date that Charles
- 16 Taylor would have been elected to president, elected to office in Liberia.
- 17 PRESIDING JUDGE TARFUSSER: [10:15:34] (Microphone not activated)
- 18 MS PACK: [10:15:35] We can leave it, your Honour.
- 19 Q. [10:15:38] Let me just ask you now about the next period that I want to talk about
- 20 with you. We're going to --
- 21 A. [10:15:47] Okay.
- 22 Q. [10:15:49] -- 2002.
- 23 A. [10:15:52] Okay.
- 24 Q. [10:15:52] I'm going to spend some time talking about that time?
- 25 A. [10:15:56] Yes. Yes.

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1 Q. [10:16:00] (Overlapping speakers) And then I'm going to ask you about the time
2 between 2003 and the elections in Côte d'Ivoire in 2010.

3 A. [10:16:13] Okay.

4 Q. [10:16:14] (Overlapping speakers) And after that I will ask you about the
5 post-electoral crisis in Côte d'Ivoire in 2010-11, ask you about that time, okay?

6 A. [10:16:27] No problem.

7 Q. [10:16:28] So we start --

8 PRESIDING JUDGE TARFUSSER: [10:16:29] You said at?

9 MS PACK: [10:16:32] Sorry?

10 PRESIDING JUDGE TARFUSSER: You said, and if you'd read the transcript, you say
11 at -- "I will ask you" at what?

12 MS PACK: [10:16:38] (Microphone not activated)

13 PRESIDING JUDGE TARFUSSER: [10:16:39] After, okay.

14 MS PACK: [10:16:40] "After" I said.

15 PRESIDING JUDGE TARFUSSER: [10:16:41] Okay.

16 MS PACK: [10:16:42] I am the one who needs to speak more clearly.

17 PRESIDING JUDGE TARFUSSER: No, no, no. I just read it here, so I didn't understand,
18 I didn't capture, so.

19 MS PACK: [10:16:52] Maybe it was "and." It was "and," but my N and D were very
20 obviously too -- not very clear.

21 PRESIDING JUDGE TARFUSSER: [10:17:00] Okay.

22 MS PACK: [10:17:01] So, Mr Tarlue, I am the one who needs to speak clearly here.
23 But we can both try, okay?

24 A. [10:17:07] Okay.

25 Q. [10:17:08] Now we go to 2002, were you in Abidjan in 2002?

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- 1 A. [10:17:20] 2002, yes.
- 2 Q. [10:17:22] Did you move back to Guiglo at one point?
- 3 A. [10:17:31] Yeah, in the same, 2002, I went back to Guiglo to visit my family.
- 4 Q. [10:17:36] Do you remember, and just think now not the year, not the month, but
- 5 just an event, an event which happened after which you went back to Guiglo?
- 6 A. [10:17:48] Yes.
- 7 Q. [10:17:50] Tell us.
- 8 A. [10:17:53] Okay. When I went back to Guiglo in 2000 I went to see my family and
- 9 later they told us that the general of Ivory Coast had been killed and then I decided to go
- 10 back to Abidjan.
- 11 Q. [10:18:23] Okay. Now I'm reading to see that everything is being written down,
- 12 so that's why I'm looking at my screen, okay? So just to go back on the names there, you
- 13 said that the general of Ivory Coast had been killed. What was his name, the general?
- 14 THE INTERPRETER: [10:18:48] Could the witness speak clearly, please.
- 15 PRESIDING JUDGE TARFUSSER: [10:18:51] Mr Witness, can you sit up properly. It
- 16 seems that you're falling asleep.
- 17 THE WITNESS: [10:18:56] Okay.
- 18 PRESIDING JUDGE TARFUSSER: [10:18:59] And speak into the microphone and
- 19 speak clearly. Thank you.
- 20 THE WITNESS: [10:19:04] (Interpretation) Okay.
- 21 MS PACK: [10:19:08]
- 22 Q. [10:19:08] I think I heard you say Guéï; is that right?
- 23 A. [10:19:12] Yes, Guéï.
- 24 Q. [10:19:13] So after he was killed you went back to Guiglo?
- 25 A. [10:19:19] Yes, I went back to Guiglo.

1 Q. [10:19:22] Why did you go back?

2 A. [10:19:28] Well, situations were not favourable because we did not have much
3 chance. And the situation was bad so I needed to go back to my family and see how they
4 were fairing on.

5 Q. [10:19:47] And just to clarify, the situation wasn't good for who? For you in
6 Abidjan?

7 A. [10:20:00] Yes, it was not good because we just came from war, we flee from war,
8 and then we heard again in Côte d'Ivoire whilst we were there -- I was in Abidjan, they
9 said that the general had been killed. So it was not favourable for us, I decided to go
10 back.

11 Q. [10:20:18] Did you go back to the camp, to the camp you were at before, the UN
12 camp?

13 A. [10:20:27] Yes, I went back.

14 Q. [10:20:31] And when you were in the UN camp do you remember meeting some
15 Liberians there?

16 A. [10:20:45] You mean in the refugee camp? Yes, I was living there so I knew so
17 many people there.

18 Q. [10:20:53] Is the name Baygboe a name you remember?

19 A. [10:21:04] Baygboe? You mean the name Baygboe?

20 Q. [10:21:07] Yes. Who's that?

21 A. [10:21:14] Baygboe was a politician in Ivory Coast.

22 Q. [10:21:18] We'll try another name. Do you remember Kai Farley?

23 A. [10:21:29] Kai Farley's time was later when the war came in. It was during
24 Gbagbo's regime that I knew Kai Farley, but before then I did not know him.

25 Q. [10:21:43] When you were in the refugee camp did you meet any Liberian fighters?

- 1 A. [10:21:57] At that time when Guéï was killed nothing actually was going on,
2 nobody was talking about Liberian fighters or no Liberian fighters. It was during and
3 after the elections of Gbagbo, after Gbagbo had won the elections, that was the time they
4 started talking about Liberian fighters.
- 5 To make you understand, we have not got to that point yet and, if you are taking me back
6 to 2002, we did not start the fighting in 2002. And when the war came you just try to
7 bring me right back to the area that we had started with. By then Gbagbo was not yet in
8 power.
- 9 Q. [10:22:41] I'm going to bring you to this period, so we're very clear.
- 10 A. [10:22:46] Okay, okay.
- 11 Q. [10:22:48] When the war broke out in the north in the north, in Bouaké, that time?
- 12 A. [10:22:53] Okay.
- 13 Q. [10:22:54] You think about that time, okay.
- 14 A. [10:22:56] Yes.
- 15 Q. [10:22:56] You were in the refugee camp back in Guiglo at that time?
- 16 A. [10:23:02] Yes, by then I was in Guiglo when the war broke out. That was prior to
17 the time that they took over Bouaké.
- 18 Q. [10:23:12] So we're going to just talk about this time after they took over Bouaké,
19 that's the only time, okay?
- 20 A. [10:23:20] Okay, no problem.
- 21 Q. [10:23:22] So at that time did you meet any Liberian fighters?
- 22 A. [10:23:33] Yes, after they had taken over Bouaké it was not the issue of Ivory Coast.
23 By then Paul Richard and some other guys --
- 24 Q. [10:23:46] Okay, you stopped. That's great, thank you. Let me spell the name.
- 25 A. [10:23:50] Okay.

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1 Q. [10:23:52] It's okay, Paul Richard you mentioned?

2 A. [10:24:00] Yes.

3 Q. [10:24:02] So let's just start with him. Who is Paul Richard?

4 A. [10:24:08] Okay. He was one of the Krahn men that was in (indecipherable) by
5 then. At the time the people took over Bouaké, so after that, when we tried to go,
6 Paul Richard was living --

7 THE INTERPRETER: [10:24:32] Your Honours, there is -- there is a place the
8 witness -- the witness referred to that is not clear to the interpreter. Could he go over
9 that?

10 MS PACK: [10:24:42]

11 Q. So the interpreter just wanted to know where you went, to the place you've talked
12 about.

13 A. [10:24:51] Zero Cinq, in Abidjan.

14 Q. [10:24:57] Do you know the neighbourhood 05? Which neighbourhood is that?

15 A. [10:25:07] Koumassi 05.

16 Q. [10:25:10] That's Koumassi 05. K-O-U-M-A-S-S-I 05.

17 So Paul Richard -- you say you went to Koumassi 05, that was to meet Paul Richard was
18 it?

19 A. [10:25:34] No, when I went to 05 they told me they had a meeting for Liberians.

20 By then I was living in that area, I was living at Marcory and between Marcory to
21 Koumassi area, there, 05 Koumassi, it was a walking distance, I could even walk and go
22 there. So by then they invited us to a meeting and they were the elders for the Krahn
23 people in the place, so we went there and we wanted to hear from them what they wanted
24 to tell us.

25 Q. [10:26:17] So you talk about the elders for the Krahn people. Who were they?

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1 Who are you talking about?

2 A. [10:26:27] Paul Richard was one of the elders I am talking about. And there were
3 other people also in Guiglo, so when I was hearing about this Paul Richard, Paul Richard,
4 when they invited us and they said he wanted to talk to us, then we decided to go there to
5 listen to him.

6 Q. [10:26:47] Stop a moment.

7 A. [10:26:50] Okay.

8 Q. [10:26:53] So who invited you to go there to see Paul Richard? Which people, can
9 you say the name?

10 A. [10:27:05] To go and see Paul Richard they told us that he was having a meeting
11 for Liberians, so -- that he was having a meeting in Koumassi, so I too had to go there to
12 go and listen to them because the country was already at war now with us.

13 Q. [10:27:24] Who were you with? Who did you go with to the meeting with
14 Paul Richard?

15 A. [10:27:33] I went there with a friend called Djimmy, but now I don't know where
16 he is.

17 Q. [10:27:41] Who was at the meeting with Paul Richard?

18 A. [10:27:47] At that time it was my first time, it was Colonel Digbeson, Colonel
19 Digbeson.

20 Q. [10:27:56] So you said then, you said Digbeson, colonel?

21 A. [10:28:04] Yes.

22 Q. [10:28:04] And I can spell that as best I can, D-I-G-B-E-S-O-N. Let me start with
23 him, Colonel Digbeson.

24 A. Yes.

25 Q. He was Liberian?

1 A. [10:28:26] Yes, he was a Liberian boy, he was based in Liberia, he was one of the
2 generals.

3 Q. [10:28:32] Well, he was what ethnicity?

4 A. [10:28:36] He is a Krahn.

5 Q. [10:28:38] You say he was a colonel or a general?

6 A. [10:28:45] A colonel.

7 Q. [10:28:46] Is that in the Liberian army?

8 A. [10:28:50] Yes, yes. That was during Samuel Doe's regime.

9 Q. [10:28:58] You said Samuel Doe, Samuel D-O-E. And just tell us, he
10 was -- Samuel Doe, was he president of Liberia at one point?

11 A. [10:29:13] Yes, he was the one that was overturned before Charles Taylor became
12 president, but those people, they were -- colonel was based in Ivory Coast but he was a
13 general for Doe.

14 Q. [10:29:27] And Doe was what ethnicity, do you know?

15 A. [10:29:31] He was a Krahn.

16 Q. [10:29:35] And how come this man you talk about, Digbeson, what was he doing in
17 Ivory Coast when you -- when you were in Abidjan? What was he doing there?

18 A. [10:29:50] When he came he said we had a Krahn group in -- around the world that
19 want us to come together and go back into Liberia and to remove Taylor from power.

20 Q. [10:30:06] To remove President Charles Taylor from power?

21 A. [10:30:12] Yes.

22 Q. [10:30:15] So you have Digbeson at this meeting. Who else? Who else did you
23 meet at this time in Abidjan?

24 A. [10:30:33] It was later that I started knowing the names of the other people,
25 because by then it was only Richard and Digbeson that I knew, but later some other

1 people surfaced and I came to know some other people later.

2 Q. [10:30:48] When you say that this man you met --

3 A. [10:30:55] Yes.

4 Q. [10:30:56] -- Digbeson, wanted to overthrow Taylor, President Taylor of Liberia.

5 A. [10:31:03] Yes.

6 Q. [10:31:03] Do you know how he wanted to enter into Liberia, where from?

7 A. [10:31:16] No, he did not tell us anything because it was a military secret. He
8 could not have told us by then.

9 Q. [10:31:24] Do you know what group he was part of?

10 A. [10:31:36] He was part of the first forces of Samuel Doe, that was the Doe regime,
11 but when Doe was overthrown he went to America. So he came back to get people back
12 to Liberia, so when he came back I also had the opportunity to meet him.

13 Q. [10:31:54] And did he -- was he part of a group then, another group, not the army
14 of Liberia but another group?

15 A. [10:32:09] You mean the time he came back to Ivory Coast? That was the time
16 they formed the group called MODEL. The formation of the group was the meeting that
17 they invited us for. So when we went to that meeting everybody decided that the group
18 should be called MODEL and that group was supposed to enter back into Liberia.

19 Q. [10:32:34] Let me ask you then about this group, it's --

20 A. [10:32:40] Okay.

21 Q. [10:32:42] -- MODEL, which is M-O-D-E-L, and you say it was formed at this
22 meeting you went to in Koumassi 05 --

23 A. [10:32:54] Yes.

24 Q. [10:32:59] -- with Paul Richard?

25 A. [10:33:01] Yes, Paul Richard and Colonel Digbeson.

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- 1 Q. [10:33:05] Who else was in this group, MODEL, that you're talking about?
- 2 A. [10:33:13] In MODEL they had Djeon Yeme, they had Kai Farley, they had -- they
- 3 had some other people that I cannot recall all the names now --
- 4 Q. [10:33:27] We take those two names, I can spell them I hope.
- 5 A. [10:33:32] Okay.
- 6 Q. [10:33:33] I think you said Djeon Yeme, yes?
- 7 A. [10:33:37] Yes.
- 8 Q. [10:33:39] The spelling would be D-J-E-O-N Y-E-M-E. And I think you said
- 9 Kai Farley, which is K-A-I, and then F-A-R-L-E-Y. Kai Farley, where was he from?
- 10 A. [10:34:10] He's a Krahn too.
- 11 Q. [10:34:14] Was he Liberian?
- 12 A. [10:34:16] Yes.
- 13 Q. [10:34:17] What about Djeon Yeme, where was he from?
- 14 A. [10:34:19] He is also a Krahn from Liberia.
- 15 Q. [10:34:23] Now, the group MODEL, who is at the top of this group? Do you
- 16 know?
- 17 A. [10:34:37] The senior person was Colonel Digbeson. He formed a group and he
- 18 was in control of the whole group. When they formed the group we had generals and
- 19 there was a general called Baygboe and when they formed that group he was part of the
- 20 Krahn also.
- 21 Q. [10:35:02] You mention a general called Baygboe?
- 22 A. [10:35:06] Yeah, General Baygboe, yes.
- 23 Q. [10:35:08] That's B-A-Y-G-B-O-E?
- 24 A. [10:35:16] Yes.
- 25 Q. [10:35:16] And you say he's a general. General in what? In Liberian army or

1 what?

2 A. [10:35:27] No, particularly in our country when we have strong warriors they refer
3 to themselves as generals. It was actually not a title that the government gave to them,
4 but it was a group of people who were brave fighters, therefore they refer to themselves as
5 generals. But at that particular moment for that group he was the general.

6 Q. [10:35:55] So he was a general in MODEL but not in the Liberian army, okay?

7 A. [10:36:01] No, not at all.

8 Q. [10:36:03] He was Liberian?

9 A. [10:36:06] Yes.

10 Q. [10:36:06] He was Krahm?

11 A. [10:36:13] Yes.

12 Q. [10:36:15] Was it a yes to was he Krahm also?

13 A. [10:36:21] Yes, he was Krahm.

14 Q. [10:36:22] Now, did he have a position in the group, MODEL?

15 A. [10:36:26] Baygboe? Yes, I said he was the general, he was the general, he was the
16 commander.

17 Q. [10:36:36] Does the name Tomo Yaya mean anything to you?

18 A. [10:36:43] Tomo Yaya came -- Tomo Yaya came at last. He came later. Before he
19 came the fighting had already started. It had been going on for a long time. He came
20 later.

21 Tomo Yaya only witnessed the war in Liberia, but when we started from Ivory Coast
22 entering into Liberia, it was Colonel Digbeson and others. Baygboe and others.

23 Tomo Yaya was not there. It was after the commander's death that Tomo Yaya was sent
24 to replace him.

25 Q. [10:37:30] Okay. And Yaya is Y-A-Y-A.

1 When you talk about a commander dying which commander did you mean?

2 A. [10:37:42] I mean Colonel Digbeson.

3 Q. [10:37:47] At this meeting, you've mentioned some names of people who were
4 there, does the name Bob Marley mean anything to you? I'm assuming it's an alias?

5 A. [10:38:00] Yes, Bob Marley was there. He also died during the war. We had
6 Uncle also. We had Kai Farley, we had Djimmy Bi (phon), we had Joe Wallace (phon).

7 Q. [10:38:16] Okay. Bob Marley, he was -- what country was he from? What which
8 ethnic group?

9 A. [10:38:26] All the people referred to are Liberians. They were all from Liberia.

10 Q. [10:38:32] And what ethnic group are the people you are talking about?

11 A. [10:38:37] They are Krahn.

12 Q. [10:38:40] And you say also, apart from Bob Marley, you have just uncle -- was it
13 just uncle?

14 A. [10:38:50] Yes, we used to call him "Uncle" and that's the only name I knew for
15 him.

16 Q. [10:38:56] Do you know another name for Bob Marley?

17 A. [10:39:00] No.

18 Q. [10:39:02] And the other person you said, Djimmy Bi?

19 A. [10:39:10] No, no, I have -- I have said Djimmy. I said Djimmy was a friend with
20 whom I went to the meeting when we were invited to the meeting.

21 Q. [10:39:23] Was he also Liberian and Krahn?

22 A. [10:39:26] Yes.

23 Q. [10:39:29] These people you mentioned, you say Bob Marley, you say Kai Farley,
24 were they part of the group MODEL?

25 A. [10:39:40] All the people I am talking about were part of the group.

1 Q. [10:39:46] Now, what was this group of Liberians? And some who had come
2 from America, I think you said, what were they doing --

3 A. [10:40:01] Yes.

4 Q. [10:40:01] -- meeting with an Ivorian man, Paul Richard, in Abidjan? Why?

5 A. [10:40:13] Well, that was what I told you, that they were arranging something to go
6 back to Liberia. And Paul Richard was one of the Krahn men that came close up -- that
7 came from close to Liberian border side. Can you allow me explain some more so that,
8 just for you to understand better?

9 Q. [10:40:37] Can you tell us, yes, please, about Paul Richard. Tell us.

10 A. [10:40:42] Paul Richard is from Toulépleu. And if the people from America were
11 doing anything they had to ask for his consent, because anything that they were working
12 on they will have to reach Paul Richard first because he was residing in Toulépleu. So
13 we needed to involve him so that we could talk to him, we (indecipherable) him to
14 understanding for us to use that area to enter into Liberia. And that was how
15 Paul Richard became very important in that -- in that particular area. And that was how
16 most of the government officials who were residing in Ivory Coast came closer to
17 Paul Richard because they needed him. There was Paul Richard and there was another
18 person, how do you call him in fact? Are you getting me?

19 Q. [10:41:39] I am getting you.

20 A. [10:41:40] Okay. We had Paul Richard and he was -- he was -- we were just chief
21 mediators and he was serving equally as chief mediator between -- between the people
22 and the community people. They were -- we were the same family.

23 And across there, between Liberia and Côte d'Ivoire, Paul Richard was living closer to the
24 Liberian border, so we needed him. Yeah. We had a close range with him. So if we
25 had any intention to take any actions into Liberia we needed him and we needed to talk to

1 him so that he could talk to the community people.

2 Q. [10:42:20] Just to get a name. You talk about, is it Toulépleu where he is from?

3 A. [10:42:28] Yes. That's the area. That's the area he hailed from, Paul Richard I
4 mean.

5 Q. [10:42:37] And that's T-O-U-L-É-P-L-E-U for the transcript. And you needed his
6 help to get access from this area over the border to enter Liberia, is that what you're
7 saying?

8 A. [10:42:55] Yes, that is exactly what I am saying.

9 Q. [10:42:58] And Paul Richard, he's Ivorian?

10 A. [10:43:02] Yes, he's Ivorian.

11 Q. [10:43:10] And is he civilian, not military?

12 A. [10:43:17] No, he is a civilian.

13 Q. [10:43:20] Did he have any position that you are aware of, apart from mediating,
14 like you say, a position?

15 A. [10:43:28] No, no. No, since the time I started meeting with him, I did not know
16 about any position that he was holding, I only know that he was closer to us and he was
17 closer to Digbeson, and he and Digbeson at first at the time they called us to the meeting.
18 He was also very close to Digbeson. So that was the reason why most Liberians on that
19 side, we were from the same tribe, we were closer to him.

20 Q. [10:44:01] And later, did he have a position? You said that this time he didn't, but
21 later, did he had a position, you remember?

22 A. [10:44:12] Before -- before we started -- because when Gbagbo won the elections,
23 the Liberians were already prepared to go back across into Liberia. Let me make it very
24 clear for you to understand because as you are asking me the question, I actually want
25 you to allow me to explain so that you can understand clearly.

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1 Q. [10:44:41] Yes, please, you explain.

2 A. [10:44:43] Okay. The Liberians had already been organised even before the

3 Gbagbo time because the Krahn people who had travelled to America, they had returned
4 from America to Côte d'Ivoire, so they were trying to organise the Krahn people.

5 This -- and this organisation started before Gbagbo's time, that was Bédié's time. And

6 when Guéï was killed and elections came, that was the time they called -- called us back

7 again together so that we tried to reorganise ourselves and we see how the new

8 government in power could treat us. And when that happened, when Guéï died,

9 everybody went helter-skelter and therefore we could not get ourselves together at that

10 moment, but when Gbagbo took over, it -- it did not take much time that the rebels took

11 over Bouaké. And when the rebels took over Bouaké, things were not good for us, so we

12 were all asked to wait. The meeting that actually brought up this problem was the -- was

13 at the time they had taken over the area where we could have used to go back into Liberia.

14 All of those areas --

15 THE INTERPRETER: [10:46:20] Mr President, the witness is going fast. He had

16 referred to names of places that the interpreter could not catch up with.

17 MS PACK: [10:46:28]

18 Q. We're going to take it slowly now. And now I'm going to ask you questions.

19 A. [10:46:33] Okay.

20 Q. [10:46:34] And then you answer, and try to keep your answers quite short, and

21 then if you want, you can just say that you want to say more and then, please, I don't want

22 to stop you from saying more --

23 A. [10:46:49] Okay.

24 Q. [10:46:50] -- but just so the interpreters they can hear, they can interpret, they can

25 write it down. We just have to move quite slowly and make it quite simple.

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- 1 A. [10:47:04] Okay, no problem.
- 2 Q. [10:47:06] Because you're the one who knows. So we all have to understand.
- 3 A. [10:47:13] Yes.
- 4 Q. Okay?
- 5 A. Yes, okay.
- 6 Q. [10:47:14] So let me just go back just to the meeting with the MODEL, the men, the
7 Liberian MODEL members. There was another one you named. I missed it when I was
8 listening.
- 9 A. [10:47:31] Okay.
- 10 Q. [10:47:33] It was John Garan; is that right?
- 11 A. [10:47:34] Yes, yes.
- 12 Q. [10:47:35] And that's G-A-R-A-N for the transcript. He was also Liberian Krahn?
- 13 A. [10:47:47] Yes.
- 14 Q. [10:47:48] Was he MODEL as well?
- 15 A. [10:47:51] Yes.
- 16 Q. [10:47:52] And just going back to Paul Richard.
- 17 A. [10:47:59] Okay.
- 18 Q. [10:48:00] Now, you mention him and I want you to think about him in particular.
19 Did he have any relatives that you were aware of that you know, that you met?
- 20 A. [10:48:16] You mean in Ivory Coast? Yes. Paul Richard had a brother, his cousin
21 or so. I don't know if he was his cousin. I don't recall the name. We used to call
22 him -- we used to call him Bombet, he was a general, General Bombet. He was a general
23 in the Ivorian military and he was general for one of the barracks that was referred to as
24 Akouédo.
- 25 Q. [10:48:47] That was General Bombet, B-O-M-B-E-T?

1 A. [10:48:52] Yes.

2 Q. [10:48:54] Do you know what his -- it is obvious, his ethnicity was, Bombet?

3 A. [10:49:01] He's Krahn.

4 Q. [10:49:04] Does the name Oulaï Delafosse mean anything to you?

5 A. [10:49:13] Yes, he was General Bombet's brother. Yeah, he was general's brother.

6 Q. [10:49:17] And when you say "brother," what do you mean? You mean they have
7 the same mother, or is it another relationship?

8 A. [10:49:30] Well, they were one parent -- they had one parent, the same parents.

9 Well, they were the same people because by then he was always saying to us that is his
10 uncle and they were saying that they were one family. I could not have gone to him to
11 ask him whether they were from the same parents. All that I know at that time and up to
12 now, I know that they were the same family.

13 Q. [10:49:54] So tell us, please, about Delafosse, Oulaï Delafosse.

14 A. [10:50:03] Oulaï Delafosse was just an interpreter that sometimes met the general.

15 By then Paul Richard was there at that time, so at the time they had any conversation or

16 discussion, he will go with the general, and we would be there for him to let us

17 understand. We did not used to ask him what they were doing or what they were asking

18 about, but he was the only man that used to go and interpret through the general. But on

19 the field, it was Oulaï Delafosse who was doing the interpretation.

20 Paul Richard was not a military man, he was a civilian, but when we had contact with

21 them and between them and our generals, Delafosse would be there to be -- to be

22 interpreting. And Delafosse was working along with Baygboe, but at that particular time

23 the thing that they used to discuss, we could not know because we were just very junior

24 people.

25 Q. [10:51:20] So you said Delafosse was working along with Baygboe. Was that the

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- 1 general that you were talking about earlier, the Liberian?
- 2 A. [10:51:32] Yes, yes.
- 3 Q. Let me ask you, Delafosse, was he a military man?
- 4 A. [10:51:38] He was a military man in Ivory Coast.
- 5 Q. [10:51:41] And what was his rank, do you know?
- 6 A. [10:51:43] He was a sergeant.
- 7 Q. [10:51:46] And what -- was he in the armed forces?
- 8 A. [10:51:50] Yes.
- 9 Q. [10:51:52] Do you know where he was from?
- 10 A. [10:51:56] Yes.
- 11 Q. [10:51:57] Where?
- 12 A. [10:52:00] From Toulépleu.
- 13 Q. [10:52:03] Is that Toulépleu?
- 14 A. [10:52:04] Yes.
- 15 Q. [10:52:07] Was he a member of a group later, a group that you recall?
- 16 A. [10:52:15] What?
- 17 Q. [10:52:16] Was he a member of a group? You've spoken about MODEL. Was
- 18 Delafosse a member of any group?
- 19 A. [10:52:26] Yes, he was a member of MODEL because he had the opportunities and
- 20 he had the chance to get up to the military people in Côte d'Ivoire and have certain
- 21 discussions with them and to put certain modalities in place. And they were senior
- 22 people, so most of the things that they discussed at senior level, we were junior people,
- 23 we did not know except if they came down to us to tell us.
- 24 Q. [10:52:53] I'm going to break that up a bit.
- 25 A. [10:52:58] Okay.

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1 Q. [10:52:59] When you talk about MODEL, he was a member of MODEL, did
2 MODEL have another name?

3 A. [10:53:10] MODEL, the name MODEL was formed -- before going to Liberia, the
4 name was MODEL. That was why I said I wanted to explain a little bit. It will be
5 difficult for me if you don't allow me to explain as the situations were unfolding. I want
6 to give you the correct and entire information, so that is the main reason why I want you
7 to give me the chance to explain.

8 Q. [10:53:39] I don't want to hold you back, so you must explain. It's just to
9 understand the other name, if there is another name for MODEL, you can explain that.
10 Take your time.

11 A. [10:53:50] Yes, MODEL.

12 MR O'SHEA: [10:53:52] Can I make a suggestion? In the light of what's been
13 happening with other questions that by all means allow the witness to explain, but
14 perhaps if my friend can just say "pause there" after a few sentences to allow us to catch
15 up.

16 PRESIDING JUDGE TARFUSSER: [10:54:07] I think so.

17 MS PACK: [10:54:09] Of course.

18 PRESIDING JUDGE TARFUSSER: [10:54:09] It is difficult.

19 Mr Witness, you can say what you want, but sometimes just slow down or pause in order
20 for --

21 THE WITNESS: [10:54:21] Okay, okay, no problem.

22 PRESIDING JUDGE TARFUSSER: [10:54:23] -- for the recording to be -- okay, thank you.

23 MS PACK: [10:54:27]

24 Q. And Mr Witness, I'm not trying to stop you speaking. If I go like this and I ask you
25 to pause, I'm not trying to speak you speaking, just to say slow down, give everyone time

1 to hear and understand and then we start again, okay?

2 A. [10:54:44] Okay.

3 Q. [10:54:46] So we were back with MODEL and I asked you if MODEL had another
4 name.

5 A. [10:55:01] MODEL later changed after, after the clash in Ivory Coast; that was
6 when Gbagbo came to power. When the rebels took those areas, Danané and other areas,
7 it was difficult to pass through Toulépleu peacefully to get into Liberia, but later, those of
8 us Liberians were waiting to travel into Liberia. The area that we were supposed to use
9 to enter Liberia, that was supposed to be the Krahn area because we were Krahn, and that
10 was Grand Gedeh area.

11 Q. [10:55:53] And the last place you mentioned was Grand Gedeh area?

12 A. [10:55:58] Yes, that is Grand Gedeh area because when you leave Toulépleu, you
13 will have to pass through Grand Gedeh.

14 Q. [10:56:05] And just a moment, just to -- because we have a break very shortly, we
15 stop and then we start again.

16 So you said MODEL later changed?

17 A. [10:56:16] Yes.

18 Q. [10:56:17] Okay, so what did it change to? Just tell us that.

19 A. [10:56:21] It's what it changed to was --

20 THE INTERPRETER: [10:56:26] Mr President, the interpreter did not catch that last
21 word.

22 MS PACK: [10:56:33]

23 Q. [10:56:33] You have to repeat. We didn't hear.

24 A. [10:56:36] LIMA, LIMA.

25 Q. [10:56:37] That's L-I-M-A?

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1 A. [10:56:43] Yes.

2 Q. [10:56:44] Now let me ask you about LIMA, okay? We'll just ask about that.

3 A. [10:56:48] Okay.

4 Q. [10:56:49] We can come back to the question about the border and how to enter
5 Liberia a bit later.

6 A. [10:56:56] Okay.

7 Q. [10:56:57] LIMA, who was head of LIMA?

8 A. [10:57:02] The head of LIMA before we left -- you see, the way I want us to proceed
9 with this thing, you are cutting me off at a point because when we take it directly the way
10 everything started I will be able to go to explain better.

11 We never had LIMA. It was when Gbagbo took power and when the rebels took the
12 lower part of Ivory Coast, that was the time we ourselves, we did not have money,
13 actually. The government had not given us money to go into Liberia, to say we were
14 funded to go. By then, as Liberians, we had decided to get people from --

15 Q. [10:57:51] So we start again, yeah?

16 A. [10:57:53] The people from Liberia, we had LIMA, we had the Gio and the Krahn
17 people and this tribal war had started in Liberia. So the LIMA and the Krahn were not
18 together. It was when we came back to Ivory Coast to the refugee camp, the Gio people
19 from the other side heard that Gbagbo's party members were killing Liberian people who
20 were Gio, or Gio people in Ivory Coast. So that was the reason why we decided to come
21 together with them to push Gbagbo away. And the Gio people, they were the ones who
22 crossed over from Liberia and came to fight against the Gbagbo people.

23 Q. [10:58:42] I just want to clarify, and I think probably now is the time for a break,
24 but just while I remember to clarify, you said the Gio people who want -- you mentioned
25 that there was some people who wanted to push Gbagbo away; is that what you said?

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- 1 A. [10:58:59] Please listen to me. The Gio people --
- 2 Q. Okay.
- 3 A. -- felt that --
- 4 Q. I've got that.
- 5 A. -- Gbagbo's own people --
- 6 Q. [10:59:08] I've got that. So the Gio people wanted to push Gbagbo away?
- 7 A. [10:59:14] Yeah, the Gio people from Liberia joined the Gio people in Ivory Coast
- 8 because they thought they were all Gio and they said it was -- it was a revenge on behalf
- 9 of Guéï, so that was the same revenge they were taking against the Gbagbo (phon) people.
- 10 Q. [10:59:32] That's great. And just before we break, Guéï, do you know his
- 11 ethnicity?
- 12 A. [10:59:37] Yes, he is a Gio.
- 13 Q. [10:59:39] And just before we break - because I know your Honours will want
- 14 to - just if you could think when we come back we're going to just talk about LIMA and I
- 15 know we missed some things in between, but we're just going to go LIMA and that's all
- 16 we're going to talk about, okay?
- 17 A. [10:59:55] Okay, no problem.
- 18 Q. [10:59:56] So that's what we're going to do when we come back.
- 19 A. [10:59:57] Okay, no problem.
- 20 Q. Thank you very much.
- 21 A. Thank you.
- 22 MS PACK: [11:00:01] Your Honours, is this a convenient time?
- 23 PRESIDING JUDGE TARFUSSER: I think you want to as well to have a break.
- 24 So I think we break now for the half an hour and we come back at 11.30. The hearing is
- 25 adjourned.

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- 1 THE COURT OFFICER: All rise.
- 2 (Recess taken at 11.00 a.m.)
- 3 (Upon resuming in open session at 11.40 a.m.)
- 4 THE COURT USHER: [11:40:08] All rise.
- 5 Please be seated.
- 6 PRESIDING JUDGE TARFUSSER: [11:40:10] Good morning once again. Good
- 7 morning, Mr Witness, once again. Hello, Mr Witness. I give immediately the floor to
- 8 the Office of the Prosecutor for the continuing of the questioning by her.
- 9 MS PACK: [11:40:34] Thank you, Mr President, your Honours.
- 10 Q. [11:40:38] Hello again, Mr Tarlue.
- 11 A. [11:40:42] Yeah, hello.
- 12 Q. [11:40:44] Now, I'm just going to explain now how I'm going to proceed just to
- 13 remind you. I've been asked to make sure I slow down. I sometimes talk too fast. So
- 14 I'm going to slow down --
- 15 A. [11:40:56] Okay.
- 16 Q. [11:40:57] -- so if you can also and then everyone can write down what we're
- 17 saying.
- 18 A. [11:41:03] Okay.
- 19 Q. [11:41:06] What you say is more important than what I say, so please take it slowly.
- 20 I don't want to cut you off, but when I raise my hand --
- 21 A. [11:41:14] Uh-huh.
- 22 Q. [11:41:15] -- it is just so you pause and everyone writes down what you're saying
- 23 and then we start again, okay?
- 24 A. [11:41:22] No problem.
- 25 Q. [11:41:25] Okay. Now there was one thing on the transcript I wanted to correct

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1 and I think it was -- I think it must be a mistranscription. It was the answer to the last
2 question I asked Mr Tarlue, but perhaps we'll repeat it because the transcript says -- I'm
3 not sure it captured what you said, so I asked you what Guéï's ethnicity was. Could you
4 just repeat your answer for the record?

5 A. [11:41:51] He was Gio.

6 Q. [11:41:53] That is Gio, G-I-O. Thank you.

7 MR KNOOPS: [11:41:58] Mr President, I'm sorry to interrupt. The witness before the
8 break indicated three times that he wishes to make a certain clarification. I'm not sure
9 whether the Prosecution will give him the opportunity, but I observed that the witness
10 insisted to give a certain explanation on, well, probably certain contextual information,
11 so --

12 PRESIDING JUDGE TARFUSSER: [11:42:22] The witness will have all the opportunity
13 to say what he thinks is needed to be said and to clarify everything he wants to clarify.
14 So please.

15 MS PACK: [11:42:34] Thank you, Mr President.

16 Q. [11:42:37] I will give you every opportunity, Mr Tarlue, of course.

17 A. [11:42:40] Okay.

18 Q. [11:42:41] Now, we mentioned LIMA just before the break, and I want to go back
19 to that and give you a chance to tell us what you can tell us about LIMA. We're talking
20 now, just to get us in the right time, we're talking after the war started in Bouaké.

21 A. [11:43:04] Uh-huh.

22 Q. [11:43:05] After Guéï was killed, so that time. Just going on after that, okay?

23 A. [11:43:11] Okay.

24 Q. [11:43:12] So we have LIMA. Can you tell us who formed LIMA?

25 A. [11:43:26] LIMA was formed by Colonel Digbeson. Excuse me, please.

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1 Q. [11:43:40] Please go on.

2 A. [11:43:45] I was -- I was getting the first person that was interpreting clearly, but
3 the next person who is there now, I'm not getting him.

4 Q. [11:43:57] I wonder if it is the right, because my channels reverted to original. So I
5 was hearing you in your original language, Mr Tarlue. So maybe we can switch the
6 channels there. You should be on channel, I think channel 3.

7 PRESIDING JUDGE TARFUSSER: [11:44:09] Channel 1, English, I think.

8 MS PACK: [11:44:11] But Mr Tarlue should be on channel 3.

9 PRESIDING JUDGE TARFUSSER: [11:44:15] Channel 3, yes.

10 MS PACK: [11:44:17] Is Mr Tarlue on channel 3 there? Can you see? I wonder if my
11 friend can assist or a court officer could assist.

12 Q. [11:44:32] All good?

13 A. [11:44:34] It's fine.

14 Q. [11:44:35] Okay. So I was talking a bit there, Mr Tarlue, but you probably didn't
15 understand everything, but you understood what I meant, we talk slowly and do what we
16 can to --

17 A. [11:44:50] Yes, I do understand, I do understand the question that he asked me and
18 I will do that.

19 Q. [11:44:56] Okay. Thank you.

20 A. [11:44:57] Yeah.

21 Q. [11:45:01] So we go back to LIMA. Can you tell me who was at the head of
22 LIMA?

23 PRESIDING JUDGE TARFUSSER: [11:45:18] Just please the pause, the pause between
24 and slow. I know it's a hard exercise, but you have to try hard.

25 THE WITNESS: [11:45:31] (Interpretation) Okay. The LIMA group was formed in

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1 Guiglo. How do they call him, the man? Maho Glofiéhi.

2 MS PACK: [11:46:00]

3 Q. [11:46:01] Can you -- let me spell that word, Maho, M-A-H-O, Glofiéhi,

4 G-L-O-F-I-É-H-I.

5 How did LIMA relate to MODEL?

6 A. [11:46:32] MODEL was a group that was formed by the Liberians themselves.

7 That was the first group that was to take Taylor out of power, but when --

8 THE INTERPRETER: [11:46:48] Mr President, the witness is still going very fast.

9 PRESIDING JUDGE TARFUSSER: [11:46:52] What can we do? What can we do?

10 Think about it, please.

11 THE WITNESS: [11:47:01] Okay. (Interpretation) Well, I have -- I had a little

12 problem, because during the war I had an ear problem, and I had an ear problem. So

13 yeah, because of the sounds of the heavy weapons, the heavy artilleries, I have some ear

14 problem.

15 So you too have to slow down a bit so you can allow me an -- so that was what I was

16 saying, the lowest part of Ivory Coast is the same lower part of Liberia that is closer. So

17 the Gio in Ivory Coast had said that it was Gbagbo who played games for Gio to be killed.

18 So the Gio on the other side of Ivory Coast told the Gio in Liberia that Gbagbo -- that they

19 should come and join the others in Côte d'Ivoire so that they take him out of power.

20 The Krahn people in Toulépleu, Bloléquin and Zéaglo, when the war was reaching

21 towards Zéaglo, they did tell, say that the Liberians were bringing war into Ivory Coast.

22 So those of us Liberians who were not part of this, who were coming from Danané, we

23 were Krahn, and we cannot come there and attack the Krahn.

24 And the people who came from the Liberia side helping the people in Danané, they told

25 the people from the Gio side to come over and help them to get rid of Gbagbo. So later

1 on --

2 Q. [11:48:53] Can I just get some names correct, okay?

3 A. [11:48:58] Okay.

4 Q. [11:48:59] So we were talking about the Krahn people in Zwedru; is that right?

5 A. [11:49:07] No. I'm saying the Krahn people in Zwedru related to the people in
6 Toulépleu, and the Gio also in Danané, and those who were coming from Liberia, they
7 also had the same relationship. They use the Nimbanians from Liberia to help the
8 Nimbanians in Ivory Coast so that they would join the Krahn to get Gbagbo out, because
9 they had already had the idea that it was the Gbagbo people who were attacking the Gio
10 in Côte d'Ivoire. So the Gio from Liberia wanted to join them.

11 Q. [11:49:46] And just the word there you said was the Nimbanians? Was
12 that -- you're talking about people from Nimba in Liberia?

13 A. [11:49:55] Yes, they came to Danané. Sam Bockarie, that was during Charles
14 Taylor's time.

15 Q. [11:50:03] Okay. And the Nimba people are the same -- the Gio people are from
16 Nimba?

17 A. [11:50:11] Yes, the Gio people are from Nimba.

18 Q. [11:50:15] Okay. I think we understand now the situation with the two different
19 ethnic groups that you've described. So now --

20 A. [11:50:23] Uh-huh.

21 Q. [11:50:24] -- we want to just go to LIMA and just talk a bit more about just this
22 group and how it worked. So LIMA, were the members -- where were the members of
23 LIMA, where were they from?

24 A. [11:50:48] Well, you know, I am just trying by my little wisdom, I'm not educated.
25 Yes, I know you want to get how the contacts came about, so that is what I'm trying to say.

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1 I want us to come to the Gio and the LIMA and how we were able to get the LIMA. But
2 when you take me to the Gio and later bring me to the LIMA, it makes it difficult for me.
3 So I want you to allow me so that I try to draw the relationship between the two.

4 Q. [11:51:24] So --

5 MR O'SHEA: [11:51:25] Sorry, just a second, please. Your Honours, just to assist us
6 we would just like to mention that on page, sorry, on page 52, line 24, the mention of the
7 name should be in the transcript Sam Bockarie, and we'd like that to be properly recorded
8 in the transcript.

9 And line 25 the word "Taylor" is also missing.

10 MS PACK: So Bockarie is B-O-C-K-A-R-I-E.

11 PRESIDING JUDGE TARFUSSER: [11:52:03] And Taylor on 25.

12 THE WITNESS: [11:52:21] (Interpretation) Sam Bockarie in a sense was called
13 General Mosquito. But in French he was called Sam Bockarie, but in English they call
14 him General Mosquito. He came along with the fighters who came to help the people on
15 the other side of Côte d'Ivoire.

16 MS PACK: [11:52:40]

17 Q. [11:52:40] And that's spelt Mosquito as in the insect.

18 Now I want to give you a chance to say what you wanted to say to make the bridge
19 between what you were saying and LIMA.

20 A. [11:52:55] Okay.

21 Q. [11:52:55] So you say what you need to say --

22 A. [11:52:56] Okay.

23 Q. [11:52:58] -- slowly.

24 A. [11:52:58] Okay, no problem. As I was saying, when the Nimbanians came -- the
25 Nimbanians came from Liberia to Danané. They came because they said the Gbagbo

1 people were killing the Gio people. So they too came from Nimba in Liberia to come and
2 help the Nimbanians in Côte d'Ivoire. By then we had formed the MODEL, but we did
3 not do anything. We were in Guiglo, we were in Guiglo, where the people took
4 Toulépleu. And when they took Toulépleu and Bloléquin that was the time they came to
5 the Liberian people, because the people from Danané, they are Liberians, but they were
6 not looking about the tribe's position, they were looking at the common language.
7 They came from Liberia to attack the Ivorian government. We, the Liberians, sometimes
8 when your friend goes out, you don't see him, and they were checking people and they
9 were seeing we were Liberians. And we had just come from war. And we cannot just
10 sit down like that, because we knew what was happening.
11 So the Gio people came from Liberia and they added to the other Gio people in Ivory
12 Coast before, because they said they were killing the Gio people.
13 But the Gbagbo people were not thinking about Krahn, Gio. All they said was Liberians.
14 So they had told their people that any Liberians that they saw doing something cynical
15 should be checked.
16 THE INTERPRETER: [11:54:45] Mr President, let the witness be asked to slow down,
17 please.
18 PRESIDING JUDGE TARFUSSER: Slow down.
19 THE WITNESS: Okay.
20 PRESIDING JUDGE TARFUSSER: Slowly.
21 THE WITNESS: [11:54:56] (Interpretation) Okay. So we ourselves, we went to the
22 people Maho Glofiéhi and told him that they were harassing our people and that we are
23 not moving freely. We said we were Liberians, and we said we are Krahn people; so it
24 would be better to save our own side. Nobody had given us money, nobody came to us
25 to come and fight for Gbagbo. We used our own ideas and we wanted peace for our

- 1 people. So we wanted to settle our own part of this cause.
- 2 So they told us at the time Maho Glofiéhi was around the city mayor. The chef told him
- 3 that -- we told him that we knew what was happening to the government. They were
- 4 sent, the Liberians were fighting in Côte d'Ivoire, but there were some tribalism since that
- 5 came from Liberia.
- 6 So we set the Liberians on the side of Nimba. They went -- they came -- when they came
- 7 to Ivory Coast, they were not totally Liberians, but those who came from Liberia had come
- 8 to help us. We cannot sit down and watch our people dying. And we were also trying
- 9 to ask to the government to help push those people so that our people could get safety.
- 10 But it was actually that they were saying that Liberians, you are creating problems in
- 11 Ivory Coast.
- 12 So we went to Maho Glofiéhi and that we should get to the government and he should go
- 13 to Abidjan and see how he could put things in place. When he went to Abidjan, he came
- 14 back, he said everything was fine. He said: I will take you to the barracks and show
- 15 you to the captain, Captain Doumbia, to see you and tell you that you should help them.
- 16 And that was what it happened.
- 17 MS PACK: [11:57:27]
- 18 Q. [11:57:27] I'm going to do one name and then just check that you have said what
- 19 you need to say.
- 20 A. [11:57:32] Okay.
- 21 Q. [11:57:33] The last name you mentioned was a captain at the barracks. Would
- 22 you repeat the name?
- 23 A. [11:57:44] Captain Doumbia. He's a captain. He was the commander in chief for
- 24 the barracks in Guiglo.
- 25 Q. [11:57:54] It is spelt D-O-U-M-B-I-A.

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1 PRESIDING JUDGE TARFUSSER: Yes, please.

2 MR ZOKOU: [11:58:09] (Interpretation) In the transcript they keep -- Digbeson, we
3 can read Digbeson in the transcript all the time, whereas the name that is being
4 pronounced is different. So I don't think it is Captain Digbeson as it is in our transcript.

5 MS PACK: [11:58:41] I think that was -- is that a while ago? But perhaps we can just
6 come back to that name in a bit and we can just try and get it phonetically onto the record
7 for my friend.

8 PRESIDING JUDGE TARFUSSER: [11:58:55] Can't we do it now?

9 MS PACK: [11:58:57] Yes, okay.

10 Q. So the name, I think the name that is -- it wasn't the name you just spoke, but it's
11 another name you've been speaking --

12 A. [11:59:06] No, no, no. I want you to just tell me because Colonel Digbeson was
13 not a Liberian. Doumbia was the head of the barracks and where that name came from
14 was Guiglo and Doumbia was the commander of the barracks in Guiglo. It was through
15 him that everything happened. It was through Maho Glofiéhi and Captain Doumbia that
16 everything happened. That was the people through whom we were able to get to the
17 government. And Doumbia told Maho Glofiéhi to go to Abidjan to meet the big people.
18 He could not deny it. So he went to the big people and told him what the matter was.
19 And he went there and he came back and told us to work for the barracks.

20 THE INTERPRETER: [11:59:57] Mr President, let the witness slow down.

21 PRESIDING JUDGE TARFUSSER: [12:00:02] Slow down.

22 THE WITNESS: [12:00:03] (Interpretation) Okay.

23 MS PACK: [12:00:09]

24 Q. [12:00:09] I got it with Doumbia. I think we heard that.

25 MS PACK: I'm going to come back, with your Honours' permission, to the other name.

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- 1 It's just confusing. It wasn't part of the immediate narrative I thought.
- 2 MR O'SHEA: [12:00:21] I -- I can help. It's Digbeson.
- 3 MS PACK: [12:00:25] It's Digbeson.
- 4 MR O'SHEA: [12:00:26] That's how the witness pronounced it.
- 5 MS PACK: Yeah, okay.
- 6 MR O'SHEA: Digbeson.
- 7 MS PACK: And then --
- 8 MR O'SHEA: So we have Doumbia and we have Digbeson.
- 9 MS PACK: [12:00:31] Yeah, but I don't --
- 10 MR O'SHEA: Colonel Digbeson and Captain Doumbia.
- 11 MS PACK: I don't think Digbeson was in the last bit though, but anyway,
- 12 we'll -- we'll -- if you could just repeat --
- 13 PRESIDING JUDGE TARFUSSER: [12:00:35] Do not overlap, please --
- 14 MS PACK: Yeah.
- 15 PRESIDING JUDGE TARFUSSER: -- also when you are speaking. I mean it's a chaos.
- 16 MS PACK: [12:00:40] Yeah, well, I (inaudible) --
- 17 PRESIDING JUDGE TARFUSSER: [12:00:42] It's -- we should all, not only the witness,
- 18 be a little bit more cautious of the difficulties. Thank you.
- 19 THE WITNESS: [12:00:55] (Interpretation) So that is what the difference is because
- 20 Digbeson was just for the Liberians, he knew what was happening. So the war came
- 21 from Liberia into Ivory Coast, the Gio and the Krahn. So those of us, the Krahn, we only
- 22 run away from war into Liberia, so we wanted to help the army to get these people back
- 23 into Liberia.
- 24 MS PACK: [12:01:26]
- 25 Q. [12:01:26] Okay, we've got that. Now, let me just clarify some of what you've said.

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- 1 So I'd just ask you some questions and you can help us understand, okay?
- 2 A. [12:01:37] Okay.
- 3 Q. [12:01:38] So you're saying we, MODEL, were already there in this area in the
4 west?
- 5 A. [12:01:51] Yes.
- 6 Q. [12:01:51] After Bloléquin, after Toulépleu have been taken?
- 7 A. [12:01:59] And Zéaglo.
- 8 Q. [12:02:07] Okay. Zéaglo is spelled --
- 9 A. [12:02:08] Yes, Zéaglo.
- 10 Q. -- Z-É-A-G-L-O.
- 11 A. [12:02:15] Uh-huh.
- 12 Q. [12:02:18] Now you say "we, MODEL," so you, you yourself, were you a member
13 of this group?
- 14 A. [12:02:31] MODEL? The name MODEL started from the beginning when they
15 formed the group because by then there was no activity. But after, when those people
16 attacked Liberia and took the lower part of Ivory Coast, Toulépleu, Bloléquin, Zéaglo,
17 when they took those areas, it was the Krahn people on that side that decided to come
18 together. So later when they told us we did not have money, but we got to help the
19 people, to push the people away because the people who were coming to fight in Liberia,
20 we are not in the same tribe as them, but the Ivorian government took it that as Liberians
21 we were all Liberians creating problem in Côte d'Ivoire.
- 22 Q. [12:03:24] So I understand what you were saying about helping your Krahn
23 brothers --
- 24 A. [12:03:38] Uh-huh.
- 25 Q. [12:03:39] -- My question is were you yourself a member of this group, MODEL?

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1 A. [12:03:51] Yes, I was part of the group.

2 Q. [12:03:58] Now, you describe a time when all of these places have been taken by
3 the other side.

4 A. [12:04:08] Uh-huh.

5 Q. [12:04:09] And then you say that you wanted -- that you were added to the
6 government and you went to Doumbia --

7 A. [12:04:29] Uh-huh.

8 Q. [12:04:31] -- and you went to be with the government with him; is that right?

9 A. [12:04:42] Yes. Let me clarify that area. I want to clarify something. I did not
10 go to Doumbia myself. It was Colonel Maho Glofiéhi who went to Doumbia and
11 Doumbia came back to us and he said, he said Glofiéhi should go back to Abidjan and ask
12 the heads there.

13 Q. [12:05:15] And to clarify, Doumbia was commander of a barracks --

14 A. [12:05:22] Yes, yes, yes.

15 Q. [12:05:24] -- in Guiglo?

16 A. [12:05:26] Yeah, the biggest barracks at the place. He controlled all the army in
17 Guiglo. That was the head barracks in that area. He was the commander of that entire
18 barracks.

19 Q. [12:05:38] And this was when you were there with MODEL?

20 A. [12:05:46] At that time we were -- we had scattered about. It was when they
21 captured Danané. I had told you that we had already scattered about. Those of us who
22 were now in the group we were in Guiglo.

23 At the time we were in Guiglo that was when Maho Glofiéhi came and said, "Since you
24 have come to me, I am asking you to go and help these people." He said, "I will go and
25 tell these people for you to help them."

1 And when he went, he was sent to Abidjan to go and talk to the government and then
2 when he came back, he spoke to a captain and he said, "I will help them." But I told him
3 Maho Glofiéhi was not from Liberia, he was from Ivory Coast.
4 And at the time the letter came to Doumbia we then were invited to the barracks and then
5 by then they asked us whether we were rebels who came to take the power from the
6 presidents. But at that time we were in a group in Liberia and the same group that
7 was -- that was in Liberia was the same group that came to Danané to take the Krahn
8 people out of there, to disturb the Krahn people. But then the Ivorian government
9 misunderstood everything and thought that it was the entire Liberian population in
10 Danané or in that area that was waging war against the Ivorians.

11 Q. [12:07:15] Okay, I understand what you're saying, so we can just ask some more
12 questions about that. And what I want to ask is you say you were invited to the
13 barracks?

14 A. [12:07:34] Yes.

15 Q. [12:07:35] So this was your group, was it?

16 A. [12:07:40] I was not the head of the group. It was Maho Glofiéhi who was head of
17 the Krahn group in Guiglo. We could not do anything without him. So it was when he
18 came from Abidjan with Baygboe and everybody, they all of us marched together toward
19 the barracks to meet the captain, and then we were asked by the military and they were
20 asking us how could we just come to the barracks like that in group. And then it was
21 after two or three days that they sent a message to us asking us whether we could help
22 them.

23 Q. [12:08:27] Now, you mentioned earlier Oulaï Delafosse?

24 A. [12:08:35] Uh-huh.

25 Q. [12:08:36] You told us he had the opportunities, he had the chance to get up to the

1 military people in Côte d'Ivoire --

2 A. [12:08:51] Uh-huh.

3 Q. [12:08:53] -- and have certain discussions and put certain modalities in place.

4 That's what you said earlier. So tell us, please, what was his role, please, Oulaï

5 Delafosse?

6 A. [12:09:12] Oulaï Delafosse was like I can say a mediator because during the regime
7 of Samuel Kanyon Doe, he was the person who opened the way for Charles Taylor to
8 enter into Liberia against the Doe government. So at that time when we also were there
9 we tried to use him as mediator and he understood everything better, so he -- he used to
10 serve as mediator. And that is what I know about him, that any information that maybe
11 when we started everything he could have been the person that we would rely on to help
12 us. And Paul Richard was not being used always. Paul Richard was not a military man
13 who -- we could have used him, but he was not a military man, so the only person that we
14 could use was Delafosse.

15 Q. [12:10:21] Okay. I think there's a name I should probably -- it's Samuel Doe again,
16 D-O-E, that appears in the transcript. And there's a middle name, I think it's Kanyon
17 Doe, D-O-E. Is that right, Samuel Kanyon Doe?

18 A. [12:10:43] Yes, that was his real traditional name because he was a Krahn man, he
19 was president of Liberia, he was the one that Charles Taylor came to overthrow. So
20 Delafosse stayed in Liberia for some time so he understood us better than Paul Richard.
21 So he was the one who served as the actual mediator between us and government of Ivory
22 Coast.

23 Q. [12:11:12] Now, I want to ask a bit about you and your role. So how is it that you
24 personally know that Delafosse was a mediator with the government of Ivory Coast?
25 How is that something that you are aware of?

1 A. [12:11:43] Well, I was mostly informed during meetings and that Delafosse was the
2 actual person who was serving as mediator as contact between us and government.
3 Before we got to the place it was Digbeson and -- but after that, when Colonel Digbeson
4 was killed, then it was Delafosse who took over everything. We were not used to
5 Delafosse initially, but it was after Digbeson's death that Delafosse came to take over the
6 job of Digbeson.

7 MR KNOOPS: [12:12:30] Mr President, could the Prosecution perhaps also ask for time
8 references. It would be helpful for the preparation of the examination by the Defence.
9 Thank you.

10 PRESIDING JUDGE TARFUSSER: [12:12:43] Thank you.

11 MS PACK: [12:12:44] Yes, in relation to this I was going to clarify.

12 Q. [12:12:49] You speak about Delafosse taking over Digbeson's job, yes?

13 A. [12:13:01] Yes. Let me make it clearer for you. I told you when Maho and
14 Baygboe and others came, we formed a group. They formed this group that they said
15 that we wanted to help the country that we are residing in as Liberians. So, with us
16 helping the government, our people will have free movement because in the French
17 countries, when you are from a different country and you don't speak French, they
18 will -- they will only know the country that you come from but they wouldn't want to
19 know whether you belonged to a particular kind of tribe. So, in totality, they considered
20 all of us to be -- to be Liberians. So when other people -- when another tribe came with
21 problem into their country, they thought it was all Liberians. So that was the situation.
22 Even when we were introduced to Maho, he was still not satisfied. There was a
23 commander, Isaac, that stayed with us in the barracks, and when we took over Zéaglo,
24 Bouaké and when we reached Bloléquin, that was how we -- Doumbia came back to the
25 barracks. So he said, "Before this time I was not satisfied with you guys, but now that

1 you have started performing for us, I am very much satisfied." So that was how our
2 relationship was cemented with him.

3 Q. [12:14:53] Okay.

4 A. [12:14:56] So when he left, by then we were with Captain Isaac, but when we took
5 Zéaglo and Bloléquin, Captain Isaac came back and started working with us because
6 initially he was not satisfied with us. And then when he came now, when he realised we
7 have captured certain areas, he then became satisfied with us and he told us that we
8 should now all move together and capture Toulépleu, and Toulépleu was one of the
9 biggest towns in that region.

10 So after then, when he came, all of us went to Bloléquin and at Bloléquin, on the highway,
11 we had an attack against us. So, when the commander died, then Delafosse came along
12 with Colonel Yedess. So when Yedess came, he understood the area more than any other
13 person.

14 Q. [12:15:53] Okay, we're going to have to take this a lot more slowly, okay? And
15 I'm going to have to ask you --

16 A. [12:16:00] Okay, no problem.

17 Q. [12:16:02] -- I ask you a question. If you can just think sometimes just about the
18 question and try and answer that, and then if you need to say more, then just say more
19 after. Just so we can make sure that we have questions and answers.

20 A. [12:16:18] No problem.

21 Q. [12:16:19] Thank you. Thank you very much.

22 A. [12:16:20] Okay. No problem.

23 Q. [12:16:23] And let me just -- just -- because you've mentioned some names and we
24 must make sure we have them correctly on the record. So the last name that I saw -- that
25 I see you've mentioned is Colonel Yedess. So we'll just stay with him just for a short

1 moment. Colonel Yedess, which is Y-E-D-E-S-S, who is he?

2 A. [12:16:51] Colonel Yedess was one of the military men that was sent from Abidjan
3 after we had captured certain areas. So he came to change Doumbia. Doumbia was
4 supposed to go back. Doumbia stayed along with us some time and then, when Yedess
5 came, Doumbia was asked to go back to Abidjan.

6 Q. [12:17:13] So Yedess takes over from Doumbia?

7 A. [12:17:19] Yes, yes, yes, he took over from Doumbia.

8 Q. [12:17:23] And you say he's a colonel. Is he a colonel in the Ivorian army?

9 A. [12:17:30] Yes, yes. Colonel Yedess.

10 Q. [12:17:37] Now, I asked you a little while ago how -- about Oulaï Delafosse and
11 you told us he took over at one point to be in charge of everything. And just to try and
12 figure out the time, was this -- was this before Colonel Yedess took over from Doumbia?

13 A. [12:18:07] No.

14 Q. [12:18:08] When did Delafosse take over everything?

15 A. [12:18:13] No, Delafosse was only working directly with us. He was not the
16 overall commander, it was Yedess. Delafosse was the senior person for us, those of us,
17 the foreign fighters. And he was -- Yedess now became the chief for the whole barracks.

18 Q. [12:18:45] I just wanted to get the time right, okay?

19 A. [12:18:48] Okay.

20 Q. [12:18:50] So Delafosse, he was the commander for the foreign fighters?

21 A. [12:18:55] Yes.

22 Q. [12:18:56] That's you, the Liberians?

23 A. [12:18:59] Yes, those of us Liberians.

24 Q. [12:19:01] And is it Liberian Krahn that you're talking about?

25 A. [12:19:06] Yes, yes, Krahn.

1 Q. [12:19:08] Now, when you talk about these events, about Bloléquin being taken
2 and all of these places, what were you doing on the grounds? You under Delafosse and
3 Yedess, what were you doing? What were the operations that you were doing?

4 A. [12:19:28] The time you are talking about Guiglo, I was just a fighter. I was not a
5 commander. I was not even very close to those people you are talking about, maybe
6 John Garan, Djeon Yeme. Those were our own immediate commanders. But those ones
7 above us, too much above us you are talking about, they were the heads, like Colonel
8 Digbeson, Djeon Yeme, those were the commanders, those are the people who had a
9 direct link with them, but we were just ordinary fighters. We were only pushing to
10 capture more places. I said before that we, those of us who were in Guiglo, we had a
11 meeting. We had a meeting and we were brought before them, that was all. They
12 brought us before the (indecipherable) the Guiglo, and by then I used to speak a little bit
13 of French more than the other people. So that was the problem.
14 So when we were doing all of those things, we only understanding Yedess to be our father
15 and that he was in charge. He had a different nationality. He never used to understand
16 our dialect, but he used to speak French. He took care of us like his children, but through
17 him we tried to get back Toulépleu and we captured Toulépleu and then we captured so
18 many other places under Yedess because by then Commander Doumbia had been
19 wounded in action. So when he left, then they brought Yedess and that was how we
20 came to understand him, but we were not really that close to him, we did not have direct
21 link with him because we were juniors.

22 Q. [12:21:24] Sorry, the last thing you said, you didn't have a direct link yourself with
23 Yedess because you were juniors, junior people? Junior in the group?

24 A. [12:21:45] I'm saying we were just fighters. And those of them who were holding
25 the higher positions, they were not fighters who went to the war front. They only sat

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1 back and do the planning and then we went to the war front to fight.

2 Q. [12:22:01] And when you went to the war front to fight and you said that you took
3 these places, and you've mentioned these places that you took, and let me just get the
4 names. There was Bloléquin?

5 A. [12:22:17] Bloléquin. Bloléquin, we had Bloléquin. We had another place. I
6 have forgotten that name now, but maybe as we go along I will be able to remember the
7 name. We got Zéaglo. We also captured Zembe (phon), and we captured Zéaglo, and
8 Bloléquin and then Toulépleu, but before then we had captured so many other places but
9 most of the names now I cannot recall. Maybe if I recall it, you'll know.

10 So when we got to Toulépleu, when we captured Toulépleu, when we captured
11 Toulépleu, it was our plan that we did not want to be part of the Ivorian fighters again.
12 So we told Yedess that we have already done our best for you and we have tried to create
13 a free mind and everything. We equally had our plan before, even before you brought us
14 on board to fight for you, and that we then wanted to leave their own country now and
15 enter into Liberia. And he told us he will look into it, but at that time -- and the time he
16 said he was going to take to go back to Guiglo and see what happens, by then we had
17 already manoeuvred and entered Liberia.

18 MR KNOOPS: [12:23:52] (Interpretation) Still no time frames. Sorry.

19 MS PACK: [12:24:14]

20 Q. I'm waiting just to make sure everything is written down, okay?

21 A. [12:24:18] Okay, no problem.

22 Q. [12:24:20] And I'm going to just try and understand the time, so bear with me. So
23 you tell us just the end of this process, you take Toulépleu, which is T-O-U-L-E-P-L-E-U,
24 and at one point the group enter into Liberia. Okay?

25 A. [12:24:44] Yes, yes.

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1 Q. [12:24:45] Do you remember which year the group entered into Liberia?

2 A. [12:24:53] It was between 2002 to 2003, but I cannot actually remember the actual
3 dates. That was the time Gbagbo told his people that he needed peace, he did not need
4 war. So he asked us to go to Liberia to have a peace meeting, and we said we had fought
5 for them and we did it with free mind, and we too, we're not going to go back to our own
6 country to stop war, so we decided to go back to Liberia. He said he was going to
7 Abidjan --

8 THE INTERPRETER: [12:25:27] Mr President, could the witness be asked to go slowly.

9 PRESIDING JUDGE TARFUSSER: [12:25:31] Yes, slowly.

10 THE WITNESS: [12:25:32] (Interpretation) Okay, Mr President.

11 MS PACK: [12:25:37]

12 Q. Okay, so we just -- so we just want to keep ourselves now because we have, I think,
13 this full story from when you came back to the west and you go and you take these towns
14 in the west, finally Toulépleu, and then the group goes to Liberia. Now, let me ask you
15 some questions now and let's just do it question/answer, keep it short, about what you've
16 said, okay?

17 So let me just understand a bit about you. So you described yourself --

18 A. [12:26:23] Uh-huh.

19 Q. [12:26:24] -- as a fighter. Did you have any other role in the group, another role?

20 A. [12:26:35] Yes, during the fighting, most times, sometimes when we come from the
21 frontline, at the time I was selling ice cream. My military friends that I had before, I will
22 have to go and meet -- meet them and explain things to them how things were going on,
23 and I make it clear to them, and -- and Yedess by then now knew me that I was a good
24 fighter, he was close to me now. He started calling me his son, his son. So most times I
25 will come back and explain how the fighting was going on. And that was the time

1 people started actually knowing me in Zéaglo. And by then, because I was a very active
2 person, I then became close to Yedess and Yedess would always ask me and I would go
3 close to him to explain to him how the fighting was going on.

4 Q. [12:27:33] Okay. So just to understand your answer, why you, you in particular,
5 why were you the person who was helping and explaining things?

6 A. [12:27:55] Sometimes people never knew our rule that -- people never knew what
7 we were doing. People gave us money from the Baygboe side to come and fight, but
8 when they came back they would not give the correct explanation, but we did -- we're not
9 concerned about Gbagbo being in power, because by then they thought because Liberian
10 people were fighting in Côte d'Ivoire we were all bad people, so we only joined the
11 government to fight and push those people because we wanted our people to be free
12 within their country, so that is all.

13 Q. [12:28:30] We get that. I think we get that. Do you speak French?

14 A. [12:28:36] A little bit.

15 Q. [12:28:37] And the other Liberians who you were with, did they speak French as
16 well as you?

17 A. [12:28:43] No. I spoke better French more than them because I -- I sold ice cream
18 for quite a long time in Ivory Coast and when you sell in the streets of Ivory Coast you
19 will be forced to speak French because if not you will not be able to do your business. So
20 I managed to speak the French and most times I do speak the French that they would
21 understand. And most of the other people, the other fighters, were not French speakers,
22 they did not speak French, so they relied on me to do the explanations. So most times
23 when I came they -- I did the explanation and I would tell them how the war was faring
24 on.

25 Q. [12:29:24] So you, the Liberians, you were -- who was your commander, you?

1 A. [12:29:32] It was Baygboe.

2 Q. [12:29:35] And you told us about Delafosse earlier. How -- what was your
3 relationship with Delafosse?

4 A. [12:29:43] With Delafosse we did not have any relationship. We have the Krahn
5 tribe, but within the Krahn we have so many smaller tribes. Dialects are differences.
6 We were the Tchien. And the people from Toulépleu, we are closer to Delafosse because
7 they were the same family and speaking the same language. So Oulaï Delafosse was
8 being looked at as their own brother. And he was somebody that they understood.
9 And that was their own part of the country. So that was the only reason why we were
10 close to him. So that was why he was attached to the Liberians.

11 Q. [12:30:23] And you see with Delafosse was he above Baygboe, the -- who
12 was (Overlapping speakers)

13 A. [12:30:33] Yes, but Baygboe only had powers in Liberia. He did not have power
14 in Côte d'Ivoire because it was Paul Richard, Delafosse and Glofiéhi. Those were the
15 people who had power within the Ivorian territory. So when we were moving they were
16 above us, but then when we entered into Liberia then Baygboe took over the command.
17 Within Ivory Coast it was Oulaï Delafosse, Maho Glofiéhi and the others. Baygboe only
18 became commander for us when we entered into Liberia. And within Côte d'Ivoire he
19 was also a junior person for those people.

20 Q. [12:31:17] So Delafosse was in charge of the Liberians. And you also mentioned
21 Glofiéhi. Who was he in charge of?

22 A. [12:31:30] Glofiéhi was in charge. It was not only Liberians who went to help the
23 government. They also had a Krahn group who were based in Ivory Coast. And they,
24 too, were asked to help the government.

25 At that time they asked us to go for training because by then we had already come from

1 war and we had taken training, we knew how to use a gun. So people who volunteered
2 from the Krahn group in Ivory Coast to help the government they also joined us. And so
3 we also decided -- they decided to join us also because as they were helping us we -- they
4 considered us to be their neighbours.

5 Q. [12:32:17] Okay. So just to understand, who was Glofiéhi in charge of? Which
6 group of people? Which people?

7 A. [12:32:31] Glofiéhi was, by then, he was -- he was like the city mayor. He was in
8 charge of each and every group that wanted to help the government. Delafosse and
9 others were not in Guiglo, they were in Abidjan.

10 Q. [12:32:52] Now, Delafosse, where did -- did he get orders from anyone?

11 A. [12:33:04] From the military barracks.

12 Q. [12:33:07] Which, the barracks in Guiglo? Which military barracks?

13 A. [12:33:14] The biggest barracks in Abidjan.

14 Q. [12:33:17] And what's the name of the barracks?

15 A. [12:33:23] État Major.

16 Q. [12:33:26] So that's, in French, the État Major?

17 A. [12:33:30] Yes, yes.

18 Q. [12:33:33] Now, I want to ask you now just to think about the État Major. How is
19 it that you know that Delafosse had his orders from the État Major?

20 A. [12:33:55] You know I stayed long with my father. My father was a military man.
21 And military people can do things without the advice of the head of the military. If he
22 wanted to do anything from the État Major of the head of the military of Ivory Coast and
23 he got information from there, they will not say Mr Tarlue or Junior is coming to work
24 with you, so he will bring the information. So that was where the information came from
25 and the messages came from. So he did tell us that he wanted to have a meeting with us.

1 At that time they were working, because I do speak French, because Baygboe did not
2 understand French, all my other colleagues did not understand French, so I used to go
3 with them to État Major mostly, and the friend that I had there was --

4 Q. [12:35:06] Okay.

5 A. [12:35:13] -- the -- everything we needed from État Major at that time. The
6 commander who was there, Kadjo Miezou, used to do everything. And sometimes when
7 we went Delafosse would leave me outside and he will enter. He will only introduce me
8 to the commander and he -- I will stay outside and he will enter and they would discuss
9 the details.

10 Q. [12:35:39] Okay. I'm just going to ask you to clarify some things here just to make
11 sure we have the names right. And we'll go back to the field, the operations later, but
12 just here -- here we are with the État Major in Abidjan.

13 So you mentioned a name, Kadjo Miezou. And I think you said, it didn't make it to the
14 English, but I think you said he was CPCO; is that right?

15 A. [12:36:04] CPCO, that is in French.

16 Q. [12:36:07] And the Kadjo Miezou, phonetically is just K-A-J-U M-I-S-S-U.

17 So you've told us that you, yourself, because of your ability to speak French, you, yourself,
18 went to the État Major? Okay.

19 A. [12:36:29] Yes, when we went for food and some other things I was always closer
20 to Oulaï Delafosse. And we -- yeah, that -- that -- that is just like when you talk to me
21 and the other lawyer speaks, then the President says we should not speak over each other.
22 That was how it happened. Most times we will go, I will be closer to Delafosse and we
23 will go, when we will go to collect food and arms, ammunition.

24 Q. [12:37:06] Okay. So you've just told us that you went to the État Major to get food
25 and to get arms and to get ammunition. And who was the food and the arms and the

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- 1 ammunition, who were -- who was that for?
- 2 A. [12:37:29] You're misquoting me.
- 3 Q. I'm sorry.
- 4 MR O'SHEA: [12:37:32] She certainly is --
- 5 MS PACK: Am I?
- 6 MR O'SHEA: -- misquoting the witness. "Food and other things" was the expression
- 7 used by the witness.
- 8 MS PACK: [12:37:39] Oh gosh. I do apologise. I actually -- I thought I actually
- 9 heard ...
- 10 MR MACDONALD: [12:37:53] Sorry to intervene --
- 11 MS PACK: (Overlapping speakers)
- 12 MR MACDONALD: -- but the witness did say arms and weapons and ammunition.
- 13 He did say that. It was heard.
- 14 PRESIDING JUDGE TARFUSSER: Let me --
- 15 MS PACK: [12:38:02] I'll ask the witness.
- 16 PRESIDING JUDGE TARFUSSER: [12:38:04] It was heard -- yes, we ask the witness.
- 17 We ask the witness what he said --
- 18 MS PACK: [12:38:07] Yeah.
- 19 PRESIDING JUDGE TARFUSSER: [12:38:07] -- and so, please.
- 20 MS PACK: [12:38:09]
- 21 Q. Maybe I misheard you. So let me just clarify --
- 22 PRESIDING JUDGE TARFUSSER: [12:38:13] No, no, let him -- let --
- 23 MS PACK: (Overlapping speakers)
- 24 THE WITNESS: [12:38:14] (Interpretation) Yes, you did not get me clearly.
- 25 MS PACK:

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1 Q. Yeah.

2 A. You asked me how I managed to go to État Major. I said it was with
3 Oulaï Delafosse. Most times when they were going for food and some other things, I
4 always -- he always asked me to join him. And when we went for food -- well, that was
5 how he made me to meet Kadjo Miezou. He was the general who used to sign the
6 waybill for all of those things. It's not always that we went to Abidjan. Sometimes we
7 stopped at Yamoussoukro. At the time --

8 THE INTERPRETER: [12:38:50] Your Honour, Mr President, the witness referred to a
9 name that the interpreter did not catch up with.

10 PRESIDING JUDGE TARFUSSER: [12:38:56] You referred to a name --

11 MS PACK: [12:38:58] Yeah.

12 PRESIDING JUDGE TARFUSSER: [12:38:59] -- we didn't catch.

13 MS PACK: [12:39:01]

14 Q. Let me just ask you again to clarify. You talked about Yamoussoukro and
15 sometimes you would go there. And what did you say about Yamoussoukro?

16 A. [12:39:14] I said that was the time that Mangou was the commander in chief of
17 Yamoussoukro.

18 Q. [12:39:23] (Overlapping speakers) Pause. Because I heard in Liberian, and let's
19 just take that slowly. I think you said Mangou, yes?

20 A. [12:39:31] Yeah, Philippe Mangou, Philippe Mangou.

21 Q. [12:39:34] And what did you say he was, what his position?

22 A. [12:39:38] The com-théâtre.

23 Q. [12:39:40] Okay, that's the French com-théâtre. And he was in Yamoussoukro at
24 this time?

25 A. [12:39:47] Yes, at that time he was in Yamoussoukro.

1 Q. [12:39:50] Do you know what position he held later?

2 A. [12:39:56] Later he was the chief of staff of Ivory Coast and after -- after which the
3 president did a nomination for him to become chief of staff.

4 Q. [12:40:08] Okay, we just go back. And I'm just asking you about the other things.
5 So you said you went to the État Major and you got food and you got other things. And
6 what were the other things that you got?

7 A. [12:40:25] Well, we went for food for the fighters because the other things they
8 never used to tell me and I was not part -- directly part of the discussion, so they only
9 used to say other things. I only knew about the food.
10 And then when we travel with our pickups and the trucks, they go -- he signs the waybill.
11 Oulaï Delafosse was the person who was in charge of everything and he will only tell us
12 about food and other things. We went for food. I did not make a statement about arms.
13 And you are saying that I made a statement about arms. If you say so, then you are
14 making a mistake because I did not make a statement about arms. I want to believe you
15 are getting me right now.

16 Q. [12:41:11] I want you to tell me what you know, nothing else, okay? Are we
17 understood? You got that?

18 A. [12:41:20] No problem. No problem. Okay.

19 Q. [12:41:24] Now, let me understand a little about the process at the État Major
20 because you've explained a little bit how that worked with the slip. So you went, you
21 say, to the État Major, you went with Delafosse?

22 A. [12:41:41] Uh-huh.

23 Q. [12:41:41] Did anyone else -- and you went from where, from the west to the
24 État Major?

25 A. [12:41:51] Yes, that is what I'm talking. Sometimes we don't get it in

1 Yamoussoukro, we don't get it in the first capital, then we go to État Major. They will
2 only give the paper to Oulaï Delafosse to take the paper, and then who will use the truck
3 and other pickups to go and pick the food and then will go back to Guiglo. It was not
4 always that we entered Abidjan, sometimes we used to stop at Yamoussoukro and get our
5 foodstuff and any other thing.

6 Q. [12:42:24] Okay. So you have you going to Abidjan or other places to get the food
7 and the other things.

8 A. [12:42:32] Yes.

9 Q. [12:42:33] And you are in -- travelling in a vehicle?

10 A. [12:42:37] Yes, a pickup, an American -- a military pickup.

11 Q. [12:42:42] How many vehicles?

12 A. [12:42:46] We were only using one pickup, but sometimes the trucks they will have
13 about three, four, to five trucks that were carrying the food.

14 Q. [12:42:57] Food? And you go, do you, from the État Major, and where do you
15 pick up the food and the other things? In the État Major in the same camp or somewhere
16 else in Abidjan?

17 A. [12:43:14] The same barracks. Sometimes we receive the food at État Major.
18 Sometimes we receive the food at Akouédo. So those were the two barracks that we
19 used to receive the food from either Akouédo or État Major.

20 Q. [12:43:31] And what sort of food were you picking up?

21 A. [12:43:37] Couscous, rice, tomatoes, onions, everything that was necessary as an
22 ingredient.

23 Q. [12:43:50] And help me with this, you tell us you were fighting on the front line.
24 Did you have weapons?

25 A. [12:44:00] Yes, I told you I'm a fighter. I had weapons.

1 Q. [12:44:05] What weapons? What weapon did you have?

2 A. [12:44:09] AK-47.

3 Q. [12:44:11] Did you have ammunition?

4 A. [12:44:15] I had arms and ammunition. I was in a war situation. I was not in a
5 relaxed mood.

6 Q. [12:44:26] I'm just waiting.

7 A. [12:44:28] No problem.

8 Q. [12:44:30] And your AK-47 and your ammunition, where did it come from?

9 A. [12:44:40] I was helping the government and it was from the government. It did
10 not come from any other place. It was not for me, we only came to help them. In the
11 great United States they have US Marines and if you are amongst the US Marines not all
12 of them are born Americans. Some people go there and join the US Marines. So I went
13 there to help the country. I was not going to ask the people whether the arms were for
14 me or the ammunition we have -- was for me, but I -- I cannot go to the war front without
15 arms and ammunition. So that was why I carried the arms and ammunition, but I did
16 not ask to know where they were coming from. All that I knew about when we went to
17 those places to collect was food and other things. For arms and ammunition to be
18 conveyed to us it was the government that did it. So that is all.

19 Q. [12:45:47] Were you wearing -- what were you wearing for your fighting, when
20 you were fighting on the front line? Did you have uniforms?

21 A. [12:45:55] I was fighting for the government, so I wore uniforms.

22 Q. [12:45:59] Do you know what the uniform was, from which part of the military, the
23 Ivorian military?

24 A. [12:46:08] Yes, from the same barracks. Yeah, it was from the same barracks, the
25 État Major, or sometimes Akouédo, sometimes Yamoussoukro.

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1 MR O'SHEA: [12:46:22] I don't want to sound like a broken record because my learned
2 friend has been saying this a few times, but I'm a bit lost on the time frame. I may be the
3 only one.

4 MS PACK: [12:46:33]

5 Q. [12:46:33] So let me clarify, because we've been talking about this time when you're
6 going to the État Major with Delafosse and the uniforms that you're wearing, the weapons
7 you have. Is this the same time as the operations you've been describing in the west,
8 when you take these towns in the west?

9 A. [12:46:52] At the time. After the war they took everything back from us. We did
10 not have anything. After the war we had nothing.

11 I know that there is something you want to understand from me, yeah, but -- and you
12 have to give me a chance so that I satisfactorily tell you. I am quick to forget things, so
13 when -- when you bring me back and forth you make it difficult for me to follow -- to
14 follow my explanations, so you have to give me chance and we go accordingly.

15 Q. [12:47:32] Of course, I give you the chance, but my colleague opposite, he needs
16 help with the time, so I'm asking you to help me. Now, these operations you describe --

17 A. [12:47:44] The problem is, if I were to be a little bit educated, I would have been
18 inclined to give you exact dates, or maybe to give you time frames intermittently, but then
19 unfortunately I'm not educated, so now I want -- I want us to concentrate on my -- my
20 testimony, but for time frames I cannot remember them exactly.

21 Q. [12:48:13] Don't worry about that?

22 A. [12:48:14] Okay.

23 Q. [12:48:15] It's not your job to worry about that. It's my job to help you and to help
24 the Court understand, so let me ask you about events and then you can remember,
25 hopefully --

1 A. [12:48:26] (Speaks English) Okay, okay.

2 Q. [12:48:27] -- the time -- what's happening around the time of these events?

3 A. [12:48:31] Okay.

4 Q. [12:48:31] So you talk about operations during this war, and is this the war that
5 broke out in Bouaké in 2002? It's after that, is it?

6 A. [12:48:47] The war broke out in Bouaké, and when that war broke out in Bouaké
7 that was the time we went for peace talks, but the peace talks did not hold and the attack
8 was in the -- in the west, and that was Danané. So during that attack, that attack
9 complicated the Liberian people in Ivory Coast because they had allowed Charles Taylor
10 to pass through Danané in contact with Doe Phyllis (phon). And then later the same
11 Charles Taylor people came and started fighting again the Krahn people in those areas, in
12 Toulépleu and other places. So that was the time -- that is the area I want you to
13 understand. I wish you are understanding me. We were not paid by anybody to fight
14 for them. We wanted to fight for ourselves. Yeah, even in America people -- people
15 join US Marine who are -- who are not born in America, so I was not born in Côte d'Ivoire
16 but I decided to help the government. I -- and I did not do it because I'm Liberian. I'm
17 an African, and when there is fire on my neighbour's house all I need to do is to help him
18 put out that fire.

19 Q. [12:50:05] I understand that.

20 A. [12:50:05] Okay.

21 Q. [12:50:06] I understand what you're saying.

22 A. [12:50:07] Okay.

23 Q. [12:50:10] It's only sometimes, because we're in a courtroom, we need to know a
24 few things a bit more clearly. So you talked about 2002, 2003 before. Is that around the
25 time when you were doing these operations and when you were going to the État Major?

1 A. [12:50:29] Yes, in 2002, that was the time Guéï got problem, so they -- took Bouaké
2 before Gbagbo came to power. So when Gbagbo came to power, at that time we were
3 not part of any incident. The fighters from Liberia came and took Toulépleu, Bouaké and
4 other places. So because the Ivorian -- the Ivorian people now were looking at us, all of
5 us as Liberians and they think that those are the people -- Liberians are coming to kill
6 Ivorian. And we were in Guiglo, and those of us who were in Guiglo and they -- the
7 Ivorian government considered the ones who were coming through Danané to be
8 Liberians too. So they did not look up to our individual tribes that they would have to
9 belong to, so they were considering all of us as Liberians and that we were the people who
10 were intending to bring war into Côte d'Ivoire. That was how we tried to help them out.

11 Q. [12:51:36] I want to -- now I get that. I want to ask you a bit more about the
12 État Major and the supplies. So you --

13 A. [12:51:47] Uh-huh.

14 Q. [12:51:49] -- have told us that you were going to the État Major with Delafosse.
15 Do you remember in your -- and that you were getting food and other stuff, things?

16 A. [12:52:11] Yes.

17 Q. [12:52:13] Do you remember in your interview saying that you were getting food
18 and uniforms and ammunition from the État Major?

19 A. [12:52:32] Yes. Yes.

20 Q. [12:52:35] Is that --

21 A. [12:52:36] Yeah.

22 Q. [12:52:38] Okay.

23 PRESIDING JUDGE TARFUSSER: [12:52:42] Can you please tell from where you are
24 quoting.

25 MS PACK: [12:52:44] I am quoting from the interview, transcript number

1 CIV-OTP-0085-0447, that's the original transcript. And I'll get the French translation
2 momentarily. And the part that I was, quite frankly, paraphrasing --
3 PRESIDING JUDGE TARFUSSER: [12:53:09] Yes.
4 MS PACK: [12:53:09] -- was at page 0472.
5 PRESIDING JUDGE TARFUSSER: [12:53:18] And if you could quote it would be better.
6 MS PACK: [12:53:20] I'll quote it, but please excuse my Liberian. I -- sorry.
7 MR O'SHEA: [12:53:25] Can I just interrupt to say I know we've got three bunches of
8 documents available. I'm afraid, for me, the original interview is close to useless. You
9 have -- the Prosecution has provided an English transcript that I have been rapidly going
10 through over the last few days, so I'd appreciate it, if possible, if the Prosecution could
11 give the preferences in the English transcript as well because it is the most useful
12 transcript.
13 PRESIDING JUDGE TARFUSSER: [12:53:57] Okay. I think that is absolutely
14 legitimate.
15 MS PACK: [12:54:06] Yes, of course. Of course it is. And I think from memory they
16 were disclosed under Rule 77, so I'm not sure whether the process is that they are up in
17 eCourt or whatever, but I will make sure that I discuss with Ms Mandavia, our case
18 manager, and perhaps these should then be uploaded so that they're available in the
19 courtroom if your Honour is content for that to happen, so that they at least can be read in
20 the courtroom on the screens. And of course we will then -- it will take me a bit longer,
21 but I will give the English and the French as well I think.
22 MR O'SHEA: [12:54:43] Well, my suggestion would be, because we're approaching the
23 break, that you don't actually put the quote now from the original transcript because, as I
24 say, there's some difficulties with that transcript. Which means that, you know, the
25 witness may be misled, we may misunderstand. I would suggest that the quote comes

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1 from the English version and then that will give you time to sort it out over the lunch
2 break. That that's my suggestion.

3 MS PACK: [12:55:09] I think that's very reasonable, your Honour.

4 PRESIDING JUDGE TARFUSSER: [12:55:11] Yes, me too, I think the quote should
5 come from both, from the original and from the translation, so we see also if it is the same
6 quote.

7 So I think we break now for the lunch and we resume at 2.30. Thank you. The hearing
8 is adjourned.

9 THE COURT USHER: [12:55:31] All rise.

10 (Recess taken at 12.55 p.m.)

11 (Upon resuming in open session at 2.33 p.m.)

12 THE COURT USHER: [14:33:49] All rise.

13 Please be seated.

14 PRESIDING JUDGE TARFUSSER: [14:34:13] Good afternoon. The floor is immediately
15 to the Office of the Prosecutor for its questioning.

16 MS PACK: [14:34:29] Thank you, Mr President.

17 Q. [14:34:32] Good afternoon, Mr Tarlue.

18 Now, I'm just going to go back, we were just talking before we had the break about you
19 going to the État Major with Delafosse and the supplies that were coming from the
20 État Major, and I want to go back to what I was going to read to you before we broke. So
21 the reference is for the original, just so we have it all, is 0085-0447, it's pages 484, line 1267
22 to 486 -- sorry, to page 486, and that's at line 1324.

23 The French translation relevantly is at 0088-0156, and it's page 0196, line 1339 to 197, line
24 1398, and for Mr O'Shea the English translation is at 0096-0150, and it's at page 0188 to
25 0190, lines 1273 to 1330. That's the first one.

1 And the second one I am going to read is from, and I'll read the French first, it's from
2 0088-0156 at page 183, lines 885 to 904, and the English is 0096-0150 and the page is 0176,
3 lines 843 to 862 going over the page.
4 So let me just deal with the first one. I was just reading out lines and pages, I'm sorry
5 that took a while, but we'll get back to your evidence now.
6 Now let me just go to the first cited page, which was the transcript 0096-0150 in English,
7 and it's page 0188, line 1273, I'm going to read from your interview, and I'd like you just to
8 listen and then I'll ask you some questions.
9 "Okay. What is the equipment at your disposal during this time?
10 Interpreter: Sorry, what's the" --
11 And then interviewer: "What is the equipment at your disposal during this time?"
12 I'll go to your answer, the next question:
13 "Equipment. "
14 And the question again: "Equipment. "
15 That's repeated a couple of times, I'm not going to read it again.
16 And the interpreter says: "She said what did you have to fight with at that time? What
17 were you using to fight with?"
18 You say it was guns.
19 I'll read the question: "Sorry? "
20 Skip over the next couple of lines. You're asked at 1288: "Who gave you -- who give
21 you the guns, who gave?
22 Answer: It's the military.
23 The question: Who in the military?
24 Answer: Hmm?
25 Question: Who in the military?"

- 1 And then your answer: "Yes, the Gbagbo government.
- 2 Question: Gbagbo government?
- 3 Answer: The Gbagbo military.
- 4 Question: But who specifically is coming with the gun and giving it to you?"
- 5 Interpreter says: "She said who is the person that told you to take the guns?"
- 6 You say: "Paul Richard after discussing with the people, he gave it to the Ivorian
- 7 commander in Guiglo to bring it."
- 8 Interpreter said: "She said what?"
- 9 You say: "Paul Richard."
- 10 And then you say again subsequently: "When he went to Abidjan after talking with the
- 11 people, after that we brought arms in a car, but the arms, we took all the arms from
- 12 État Major."
- 13 And then the question: "How did -- umm, and how do you know that Paul Richard is
- 14 getting those guns from the État Major?"
- 15 And over the page answer: "Yes, because sometimes I went with him.
- 16 Question: Yes, because sometimes -- sorry."
- 17 You say again: "I went with him. I went with Oulaï Delafosse, Commandant Oulaï
- 18 Delafosse, Sergeant Oulaï."
- 19 And the question: "Okay. You go where?
- 20 Answer: To the barracks, État Major.
- 21 Answer: To the –
- 22 Question: To the État Major?
- 23 Answer: Yeah. "
- 24 And so it goes on.
- 25 So you yourself, you went to get guns from the État Major; is that right?

1 A. [14:41:04] The idea about the gun that they -- they had asked me this question,
2 what -- what did you go to get at État Major? I said our food. And then Delafosse will
3 come along with us with the arms and ammunition. But we only had right to carry the
4 food. But for the arms and ammunition, they were not given to us. They were through
5 Delafosse. And now if you are talking about Paul Richard, Paul Richard was the only
6 person that was connected with the issue of MODEL, but when it comes to military issues,
7 it was Oulaï Delafosse who carried the arms and ammunition. So I would go with Oulaï
8 Delafosse, and I would collect the food, Oulaï Delafosse will collect the arms and
9 ammunition.

10 So that was what I said to the interviewer.

11 I am saying that I did not myself collect the arms to carry them. It was Delafosse who
12 did so. I -- I was in uniform but I was not even responsible for the transportation of the
13 arms.

14 Q. [14:42:32] And when he transported the arms, when you went back from Abidjan to
15 the west, were you with him in the vehicle?

16 A. [14:42:45] No. He had his own car and we had our own car. We were using a
17 different driver. We had our own vehicle. He was always in the front and we were at
18 the back, just in case of anything. You know, between Guiglo and Duékoué we could
19 have fallen into a military condition like an ambush. So he will use his own car. There
20 was a lieutenant -- there was a lieutenant with whom he was travelling, but he also died.
21 But we were not with him in the same car. A man Kai Farley and I, we are in our own
22 car.

23 We were always with that particular lieutenant in the car, but that particular lieutenant
24 died during the war. So at any time we came to the camp, what I told you initially was
25 that we come and collect our own food because we get it to go and share, and there was

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1 another area in the barracks where there was a court, the old court. And most times that
2 is -- that is where we fighters assembled. But it is the same area. It is close to the
3 barracks. So the explanation that I am giving, what makes the difference there is Paul
4 Richard, he was the father for everything.

5 But when it came to military issues, it was Oulaï Delafosse. He would go for arms and
6 ammunition. But for us, we go only for food. He --

7 THE INTERPRETER: [14:44:41] Mr President, could the witness be asked to repeat that
8 area?

9 PRESIDING JUDGE TARFUSSER: [14:44:46] You should repeat the last part, what you
10 said, because it was not caught by the interpreter.

11 THE WITNESS: [14:45:02] (Interpretation) Okay. What I was saying, I said because
12 Commander Oulaï Delafosse, he was on the military side. When -- but when it come to
13 the situation of talking to the junior forces, it was Paul Richard who did so. But when it
14 comes to military issues, it was only Oulaï Delafosse that they used because he
15 understood us. He used to go with us to the field and he understood that.

16 When it comes to arms and ammunition, we did not receive it. We only received food.

17 The arms and ammunition were received by Oulaï Delafosse and some other commanders
18 of his, but not us.

19 MS PACK: [14:45:44]

20 Q. [14:45:44] Okay. So you described going in a convoy with Oulaï Delafosse back
21 from Abidjan to Guiglo, yes?

22 A. [14:45:52] Yes, we were always in a convoy. We cannot go alone because if we
23 went alone, you might be arrested because the people did not know all of us. So we
24 always went to somebody that the government knew. So it was only Oulaï Delafosse
25 who had the rights to go with us. So at any time he appeared before them, they knew

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1 what he was there for, because we did not have the right.

2 Q. [14:46:18] And you mentioned another name who was with you in your vehicle, you
3 said. I didn't hear the first name.

4 A. [14:46:24] He was a lieutenant, well, he's deceased now. He died. He used to go
5 with us. You know, most times, most times in Africa, when people are fighting wars,
6 they do not use their actual names. They use pseudonyms. They use nicknames. So I
7 cannot recall his name actually.

8 Q. [14:46:44] And there was one man you did name. I didn't hear the first, but then
9 you said Kai Farley. Did you mention his name?

10 A. [14:46:54] Yeah, Kai Farley was a Liberian. We had Amos also. Amos was the
11 driver, he used to drive. When we go on that side, then he takes the car. He was, he
12 was a driver for MODEL, a military driver for the forces.

13 Q. [14:47:09] Amos is Liberian?

14 A. [14:47:15] Yes, he was a Liberian. And Kai Farley too is a Liberian. And me too,
15 I'm a Liberian.

16 Q. [14:47:22] And Amos is also Krahn?

17 A. [14:47:24] All of us we are Krahn, all of us.

18 Q. [14:47:30] I'm not going to go to the other reference, but you have it. So I'll leave it
19 just to save time.

20 You mentioned just now --

21 PRESIDING JUDGE TARFUSSER: Excuse me.

22 THE COURT OFFICER: [14:47:44] Excuse me, Counsel.

23 Mr Witness, if I may kindly request you to wait for 5 seconds after the intervention of the
24 counsel. Thank you.

25 MS PACK: [14:47:58] I have to thank madam court officer for that reminder because I

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1 must remember as well.

2 THE WITNESS: [14:48:05] (Interpretation) Okay.

3 MS PACK: [14:48:07]

4 Q. [14:48:07] So when I stop talking, just wait five and then start.

5 A. [14:48:21] You will have to tell me to go on at the time you want because given the
6 seconds that you are referring to, I don't know, I don't know it.

7 Q. [14:48:28] That's no problem. I will just indicate like this, maybe this is the time for
8 you to start answering, okay?

9 A. [14:48:37] Okay.

10 Q. [14:48:46] So now you just said also -- you were talking about the barracks, I think
11 this is the barracks in Guiglo; is that right?

12 A. [14:49:02] The État Major is in Abidjan. Then they had another barracks in Guiglo,
13 and another in Yamoussoukro and in Abidjan. So it is not clear to me which of the
14 barracks you are talking about.

15 Q. [14:49:23] The one in Guiglo?

16 A. [14:49:24] Yeah.

17 Q. [14:49:24] You and your group, were you based there at this time?

18 A. [14:49:29] At that time we were not based in the barracks. The barracks was meant
19 for the barracks staff. Those of us combatants, when we come from the front line, like a
20 distance of 20 to 30 feet, there was -- there was a big building there, an old justice building,
21 that was where those of us who were combatants were based in Guiglo.

22 Q. [14:50:08] Was that just Liberian combatants or other combatants as well were
23 based?

24 A. [14:50:17] No. Most of the soldiers, the army, they -- we used to mix together
25 because most times some army officers will want to know how the rebels are going on

1 with their rebel activities. And the military was fighting along with us. So but most
2 times we got together in the same place, yeah, but only the actual staff were at the
3 barracks. But in that building we, that is where we always gathered so that at any time
4 they need us they can reach us easily.

5 Q. [14:50:57] And when your weapons, your guns and the ammunition was distributed
6 to you, the Liberian men, where was it distributed to you, which place?

7 A. [14:51:16] In the barracks.

8 Q. [14:51:20] And who in the barracks would be distributing to you your weapons and
9 your ammunition, if you remember?

10 A. [14:51:30] Yes, let me just make you understand something. The arms and
11 ammunition came, they were expecting the people to give us -- give us ammunition, arms
12 and ammunition to be well armed like the army to try and help them. But it looks like
13 80 per cent to 90 per cent of the people in the barracks did not believe us to hold those
14 arms. So Captain Doumbia told us that he did not want us to use heavy arms because he
15 said he did not have trust in us. So each and every fighter was having an AK-47 and
16 given to him along with one magazine.

17 You know, we grew up in a war. So when we were coming to Liberia, since we grew up
18 in a war and we knew that one magazine was rarely -- it might be enough for one person
19 when you are fighting. And we the Krahn people, we are from Liberia, we grew up in
20 the war, if anything was happening and -- we could see what you could do about it.
21 So when they gave us the arms, they shared them. I got one magazine. We said we
22 were not going to meet in Guiglo, but in Duékoué. And when -- he knew when we were
23 going. And you can even walk from Zéaglo to Duékoué. And people come there
24 for -- to do business on the trade fair. And people knew, he knew that we were coming
25 to take Guiglo.

1 When we are coming on the attack, people did not believe in us. But a couple of times
2 that we went, we can only spend two days to push away that stuff and then we take over
3 the town.

4 So when we came back we had some people arrested who were not even Ivorians because
5 they had -- they had some traditional marks on their faces. And when they saw them,
6 people started seeing them and then they said, oh, they were Liberians. And some
7 people were having the gendarmerie caps, and they were in military, and we -- we too, we
8 were in military uniform. We had a little problem. As soon as they saw us, they said
9 people have been fighting for a couple of months and they -- they have fought for a long
10 time. They did not take over the place. But just this group of people who have come
11 over to help the army, within a very short period of time have strived hard to take over
12 the place.

13 So I am saying, in a sense, that the government did not arm us well because they did not
14 trust us. But when we captured the place and we will capture rebel arms, we understood
15 that we were not afraid. And some of the military men were afraid of fighting.

16 But when they saw that we were very brave to capture some major, major places, that was
17 the time they had trust in us, and then they started giving us arms and we, too, captured
18 rebel arms. So some of the officials who did not get -- have confidence in us then started
19 having confidence in us.

20 So that was the moment now they started giving us enough bullets. And at that time a
21 lot of people started joining us now. And that was the time that Captain Doumbia had
22 an attack on him and his car somersaulted. So he had a broken leg and he was taken to
23 hospital. And then, later now, we all came together and restructured ourselves to
24 capture the major places.

25 Q. [14:55:53] Okay. I'm going to stop you there because you've said a lot. And it was

1 very clear, but there are some things I just want to make sure I understand.

2 Just to get the timing clear, you talk about Captain Doumbia at one time being injured.

3 Can you remember during which attack was -- that he was injured?

4 A. [14:56:18] You know, during the revolution, sometimes when you are taking a town
5 or a village, at any time before you get to that village, you expect an attack on you.

6 So when we were taking a village there was a trap, an ambush before us. So although we
7 captured the place, but we did not expect an ambush. So when we fell in the ambush, his
8 car somersault and then he was taking -- he was injured and taken to Abidjan for
9 treatment.

10 Q. [14:56:53] I just want to get the time. So this is the reason I ask you which place.
11 Which place? If you remember where he was when he was injured?

12 A. [14:57:06] It was between Zéaglo and Bloléquin, just close to the others who fell into
13 an ambush.

14 Q. [14:57:20] So it was before or after you took Bloléquin finally, you took over
15 Bloléquin?

16 A. [14:57:29] We had already taken over Bloléquin and Zéaglo. It was going ahead in
17 order to fall into the army. And when he was injured he was then changed by Colonel
18 Yedess.

19 Q. [14:57:45] Now, I want to ask you a bit more about your group. You also
20 personally, did you personally receive training?

21 A. [14:58:04] Um, I did not receive -- I never received training because I can't call that
22 training, because if you are seen you are training you should take a training that is
23 actually intense, but because we were Liberians and we were in the war in Liberia, we had
24 already known about fighting. And we had known how to manoeuvre, how to fight at
25 the war front. Yes, but we were with them in the barracks, but I can't call it a training, it

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1 was not actually like a six or seven months training that we went through, but we were
2 with them in the barracks.

3 We were just from war. And so we knew about the fighting. And we knew how to
4 fight. So we did not -- we did not take training, but we could fight bravely.
5 So when the other people were coming from that side, we could contain them.

6 Q. [14:59:12] Okay. So earlier on you mentioned -- earlier on today you told us that
7 people gave you money from the Gbagbo side to come and fight. I'd like to ask you
8 about that. Did you receive payment, you personally?

9 A. [14:59:30] There is something I want to say because I -- when we take one journey, I
10 would want us to complete that before going to another thing.

11 They asked me that question before. If somebody told me that people received money
12 from Gbagbo to go and fight, maybe I did not see it. The only money I received, it was
13 after 2002-2003, after the war was now reduced at a place in Koumassi, that was where we
14 had a refugee place in 2002-2003. All of us who were fighters went to Abidjan to go and
15 to ask for asylum to go to America.

16 In 2002-2003, they had our pictures in uniforms. So most of us we were in Abidjan and
17 we tried to fight for asylum. So in 2002-2003, I tried to go back to the barracks to ask for
18 a release document. When I asked for the document, they told me that I should go to
19 Colonel Yedess. And when I went to Colonel Yedess I got the laissez-passer from
20 État Major.

21 THE INTERPRETER: [15:01:01] Your Honour, Mr President, could the witness be asked
22 to slow down again.

23 MS PACK: [15:01:06]

24 Q. [15:01:06] I'm going to ask you to slow down. And we just wait here because I'll
25 ask you about the laissez-passer.

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1 MR O'SHEA: [15:01:14] Sorry. Sorry, before you go on.

2 MS PACK: Yep.

3 MR O'SHEA: Your Honours, my learned friend interposed a question before this very
4 lengthy answer which was you said earlier in evidence that you were paid. This is not a
5 part of the evidence I remember at all. Could I please have the transcript reference.

6 MS PACK: [15:01:36] Yes.

7 PRESIDING JUDGE TARFUSSER: [15:01:38] In fact, I remember the opposite.

8 MS PACK: [15:01:39] It -- well, I -- it's page 71.

9 PRESIDING JUDGE TARFUSSER: [15:01:41] Which transcript?

10 MS PACK: [15:01:43] Today of the realtime transcript in English.

11 PRESIDING JUDGE TARFUSSER: [15:01:48] English?

12 MS PACK: [15:01:49] Yes. And it's lines 8 to 9. Let me just find it. Yes, people gave
13 us money from the Gbagbo side to come and fight, but when they came back they will not
14 give the correct explanation. But we did. We're not concerned about Gbagbo being in
15 power because by then they thought, because Liberian people were fighting in Côte
16 d'Ivoire, we were bad people, so we only joined the government to fight and push those
17 people because we wanted our people to be free within the country, that's all.

18 So that was the -- what I was quoting from. So --

19 MR O'SHEA: [15:02:35] Yes, thank you very much.

20 MS PACK: [15:02:36] With pleasure.

21 Q. [15:02:48] Excuse me, Mr Tarlue, I'm just finding what you last said so I can make
22 sure I don't confuse you with my questions. Yes?

23 A. [15:02:57] If you want me to clarify that area that you spoke about, I can clarify it for
24 you. I told you that when we led the war after 2002-2003, and when people came back to
25 Liberia, and when we came back to Ivory Coast, people were saying that since we helped

1 the government, yes, they asked for permission for us to be given something from the
2 president. But that thing was not given to us. So all of us went back to the UN
3 activities.
4 We were public because we were in uniform. So the people said "We cannot go to
5 America." So we stayed back. And since people knew me at the barracks, I took my
6 own way to take a refugee card. So they refused me. They said they would not allow
7 me to take the refugee card because I was in uniform, they would not allow me to go for
8 the asylum to America. And people who were not in uniform, they were accepted. But
9 those of us who were in uniform, we were not accepted. So that was the reason why I
10 decided to go to the military barracks, for me to get a paper so that I can be safe in the
11 country. And when I went my laissez-passer was fixed by Kadjo Miezou.

12 Q. [15:04:25] Okay. So now you're talking about after the operations you were
13 involved in in 2002-2003?

14 A. [15:04:43] (Speaks English) That's the time.

15 Q. [15:04:44] Wait. You're talking after, yes?

16 A. [15:04:47] Yes, that is after that I'm talking about.

17 Q. [15:04:50] You're talking about the time before or after Mangou became the chief of
18 staff? Can you say?

19 A. [15:05:04] That is the time we are talking about. That is the time we are talking
20 about. I told her that when I came back they said to us that they had given Oulaï
21 Delafosse money for everybody, for the freewill that we are giving to assist them fight,
22 that the president are giving money.
23 But when we came, we did not get anything. So we considered that people lied to us.
24 But to say that I was given money prior to the fighting, that I received money to go and
25 fight, no, I did not receive any money.

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1 Q. [15:05:38] Let me be sure about what you are saying so I'm clear.

2 A. [15:05:46] No problem.

3 Q. [15:05:47] You say that Oulaï Delafosse was given money to give you, but you never
4 received it?

5 MR O'SHEA: [15:05:57] Just to be more accurate, it was said, it was said that he was
6 given money.

7 MS PACK: [15:06:03] Yes, yes, okay.

8 Q. [15:06:05] It was said to you and others. So let me just -- who told you that
9 Delafosse was given money to pay you?

10 A. [15:06:17] Well, we had some of the youths that were Ivorians that were given those
11 moneys, those moneys. You know, in Liberia we were MODEL.

12 THE INTERPRETER: [15:06:45] Your Honour, your Honour, could the witness be asked
13 to make that area clear?

14 PRESIDING JUDGE TARFUSSER: [15:06:50] Sit up, sit up, please, and talk to the
15 microphone, please, and slow.

16 THE WITNESS: [15:06:59] (Interpretation) Okay.

17 MS PACK: [15:07:01]

18 Q. [15:07:01] So you were just explaining, and then we lost you. So you were just
19 explaining about in "Liberia we were MODEL." And then you go on. But slowly, please,
20 slow as you can.

21 A. [15:07:16] What I want to say is that from the beginning when you asked me,
22 MODEL was formed in Ivory Coast. But it was not MODEL now that was fighting in
23 Guiglo. The MODEL name was only for Liberia. After we would have taken over
24 Liberia, then we would use that name. That is to remove Taylor from power. The name
25 we will be using is MODEL. Do you understand?

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1 So in Guiglo we call it LIMA. But when we enter Liberia and left the Ivorians behind,
2 Maho Glofiéhi gave them special forces, the name special forces in Guiglo. And then
3 when we went to Liberia, that was when we had the name MODEL. And they were
4 Ivorians.

5 Q. [15:08:11] So just to clear up the names, when you, MODEL, were in Côte d'Ivoire,
6 you call yourself LIMA?

7 A. [15:08:36] Yes, yes.

8 Q. [15:08:37] You cross over to Liberia, you're called MODEL?

9 A. [15:08:42] Yes, then we became MODEL.

10 Q. [15:08:45] I understand you correctly?

11 A. [15:08:47] Yes, you understood me correctly.

12 Q. [15:08:49] And the Ivorian, the Ivorians who stay in Côte d'Ivoire, they are called
13 special forces?

14 A. [15:09:04] Yes, special forces. But at the time we were there, we were called LIMA,
15 fighting along with them. And Maho Glofiéhi then later gave the name to them as
16 special forces.

17 Q. [15:09:22] Okay. And the Ivorians who were fighting as well and who became
18 special forces, do you know the ethnicity of these Ivorians?

19 A. [15:09:37] They were Krahn.

20 Q. [15:09:40] And do you know who was at the head, who was at the top of these -- this
21 group?

22 A. [15:09:49] No. When I left we only knew that it was -- how do they call them in fact?
23 We did not know the commander because by then we were now taking care of our own
24 issues, and by then everything had changed.

25 Q. [15:10:08] And just to finish up on MODEL, when they enter Liberia, did you go

1 yourself with MODEL also to Liberia?

2 A. [15:10:21] No, no. To cut it short, I did not go to Liberia. I did not want to go back
3 to Liberia because I knew the group that was going to Liberia was in a rebel faction. And
4 my father was killed by rebels, so I did not want to be part of the rebel business. So I
5 decided to stay back in Ivory Coast.

6 Q. [15:10:48] Now, we moved away a bit from the money. I was just asking you to
7 explain a bit. And you can help me just a bit with what you were telling us about
8 Delafosse. And I asked you this question, I'm going to repeat it. Just think about my
9 question and just try answer just my question.
10 So my question was: Who told you that Delafosse was given money to pay you? Who
11 told you that?

12 A. [15:11:32] I was not the only person that heard that. It was heard, we all heard it
13 that Delafosse was given money by the government to give to us. But when we came
14 back we did not get anything like that. It was just an information that we got in general.
15 And when I -- I did not have the time again to go and ask him for that, because it was just
16 an information, a general information that was flowing.

17 Q. [15:12:04] I want to clarify with you, do you remember saying before that you
18 received -- in your interview that -- sorry, your Honour.

19 PRESIDING JUDGE TARFUSSER: [15:12:34] No, no. I just think if you quote from the
20 interview, I would quote and indicate the page so we know. Okay, thank you.

21 MS PACK: [15:12:43] I'm going to quote from this interview. And for Mr O'Shea the
22 English is 0096-0150 at page 195 at line 1496 and following.

23 And then down to the following page, line 1535, and then in the French, it was at
24 0088-0156, and it's at page 203. But I'll just read it, if that's quicker, okay?

25 Q. [15:13:41] You said this in your interview and I'm just reminding you. So the

1 question is, at line 1494:

2 So you were receiving guns from the army. What else were you receiving from the

3 army?

4 And the interpreter says: "She said so you got guns from the army. Were there other

5 things you guys got from the army?"

6 And you say:

7 "Yes. Next to the guns, sometimes a person would maybe get around 10,000. 50,000

8 after we fought for a while. Some people got 10. It depends. If you were a

9 commander, maybe you received 500 -- sorry, 50,000."

10 Interpreter says -- gives a response.

11 Then the interviewer says: "50,000 of what?"

12 And you say: "50,000 CFA."

13 A. [15:14:52] Uh-huh.

14 Q. [15:14:54] And I'm just going down then to, in the English --

15 A. [15:14:58] (Speaks English) Yeah.

16 Q. [15:14:59] The English says then at the bottom, line 1517:

17 "And the lower ones, some of them received 20,000, 25,000, 30,000."

18 And then on the next page at line 1519, the question is:

19 "Okay. How often you were receiving this money?"

20 And the interpreter said: "She said how did they give it to them? But how often did

21 they give it to them."

22 Answer: "Paul Richard gave it to his brother Oulaï Delafosse."

23 You go down a bit to line 1526, you say: "He came and shared it with us."

24 Interpreter says: "And he comes down to share it with us."

25 Question: "How often?"

1 Answer: "She said how many times a month."
2 Sorry, interpretation: "She said how many times a month did they come? How often
3 did they come?"
4 You say: "No, every month."
5 Okay. So maybe you can just explain?
6 A. [15:16:08] What you are saying, I was not paid by anyone to come here to lie. I only
7 follow my steps, because maybe tomorrow I will die and leave my kids behind.
8 I came here to say the truth. What you are saying there is the truth.
9 But this money was not a payment. It was not a salary for us to go and fight war.
10 Let me give you summary. Paul Richard was most times using most of the elites, the
11 Krahn elites that were working for the government, the Krahn that had money.
12 So when they contributed and gave to Paul Richard, they were helping us, they were
13 helping us in their own way.
14 Do you understand? So when they gave these monies to Paul Richard, they gave us.
15 But this was not monies that were given to us by the government or Gbagbo.
16 Sometimes we had very rich grand people who were elites working in Côte d'Ivoire. So
17 they mostly contributed and gave these moneys to Paul Richard. And Paul Richard will
18 give these moneys. And they did not give us directly. But they will give it to Paul
19 Richard and he will give us.
20 So after the war, I did not have anything. So firstly, when they signed my laissez-passer,
21 so those are the moneys. Those are not monies that were given to us by government.
22 They were given to us by Paul Richard. And Paul Richard was working with the elite
23 Krahn people who were working in Côte d'Ivoire. And they had money. They who
24 contribute and give those moneys to him, and he would bring these moneys and give us.
25 So these moneys that are coming later, that was when they realised actually that we are

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1 fighting very hard to capture, to capture grounds. So that was when they were giving
2 the money.

3 It is not that the moneys were donated to us by the Ivorian government or by Gbagbo. It
4 was the rich Krahn people who were living in Ivory Coast, the elites, that were
5 contributing, giving to Paul Richard to give to us.

6 Sometimes when they know that you are commander, you can be given 50,000.

7 Q. [15:18:37] Okay. Can you tell us who the elite, the elite Krahn people you are
8 talking about were? Who, who?

9 A. [15:18:52] Well, I didn't know most of the people. I knew Hubert Oulaï. He was
10 the only person that I knew, because sometimes when there was no war, when we came
11 back, when there was no -- when we came back as refugees, he used to donate food to the
12 refugees, to Liberian refugees. But before that revolution time, that war time, I did not
13 see him. It was lately after that.

14 Q. [15:19:22] Just repeat the name. I think I heard, but just repeat it.

15 A. [15:19:27] Hubert Oulaï. He was minister --

16 THE INTERPRETER: [15:19:36] Your Honour, Mr President, it was not clear to the
17 interpreter what the witness said, minister of what?

18 PRESIDING JUDGE TARFUSSER: [15:19:41] Minister of?

19 THE WITNESS: (Speaks English) Public function.

20 PRESIDING JUDGE TARFUSSER: Public function.

21 THE WITNESS: [15:19:43] (Interpretation) He was minister of public functions.

22 MS PACK: [15:19:47]

23 Q. [15:19:47] And that's Hubert Oulaï. I think Oulaï made it onto the record.

24 Your Honour, I wonder if we could just have 1 minute or 2 in private session for reasons
25 that I can explain.

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- 1 PRESIDING JUDGE TARFUSSER: [15:20:19] Let's go into private session, please.
- 2 (Private session at 3.20 p.m.)
- 3 (Redacted)
- 4 (Redacted)
- 5 (Redacted)
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1 (Redacted)

2 (Redacted)

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5 (Open session at 3.29 p.m.)

6 THE COURT OFFICER: [15:29:43] We're in open session, your Honour.

7 PRESIDING JUDGE TARFUSSER: [15:29:47] Madam Prosecutor.

8 MS PACK: [15:29:51]

9 Q. [15:29:52] Now, we're jumping around a bit in time, but I think you've mentioned
10 this so we should talk about this now; you said you got at one point a laissez-passer you
11 describe. You said after the war you got a laissez-passer. And let's just talk about this
12 slowly. Who did you get a laissez-passer from?

13 A. [15:30:22] From État Major, from Kadjo Miezou.

14 Q. [15:30:29] Can you repeat that name please?

15 A. [15:30:31] Kadjo Miezou.

16 Q. [15:30:39] That's Kadjo Miezou, same as before.

17 And do you know what position this person had at this time?

18 A. [15:30:45] At that time he was the CPC, he was in charge of anything that -- that
19 could be given to anybody from the military. He was the person by -- he was the
20 intermediary for the chief of staff for the general. So anything that involved
21 management that has to do with the general and which -- that connected with the barracks,
22 he was in charge.

23 So he could -- he could make those (indecipherable) documents for anybody who needed
24 them and whom they would want to give those documents to.

25 PRESIDING JUDGE TARFUSSER: [15:31:33] Excuse me. Can we define that time?

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1 Yes, that -- yes.

2 MS PACK: [15:31:40] Right away.

3 Q. [15:31:43] Can you remember the year? And just tell me. And then if not, I will
4 think of an event?

5 A. [15:31:52] That was the 2002 time. It was not 2011, it was 2002. But I do not
6 remember the actual dates or day.

7 Q. [15:32:07] Let me -- let me ask you some events. So when you went, you said here
8 to get your laissez-passer, was this when Mangou was the chief of staff, or was it before
9 Mangou was chief of staff?

10 A. [15:32:25] When Kadjo Miezou was at État Major, Mangou was not chief of staff. It
11 was General Bombet who was chief of staff. I -- but I came to ask for that laissez-passer
12 because sometimes when I came with Oulaï Delafosse to come and get our food. And
13 when we get the food it comes to us, so I will want to get that laissez-passer so that I get
14 the food at any time.

15 But at the time the people left and went to Liberia my laissez-passer was no longer valid.

16 And that was the time I went to go and ask for --

17 THE INTERPRETER: [15:33:13] Your Honour, the witness still needs to be asked to
18 reduce his pace.

19 PRESIDING JUDGE TARFUSSER: [15:33:18] Slow down, please.

20 MS PACK: [15:33:22]

21 Q. [15:33:22] Take it slowly.

22 A. [15:33:24] Yes. So when Kadjo Miezou left, when Gbagbo came, Kadjo Miezou was
23 no longer in, in the position. It was now Commander Sako. It was Sako who printed
24 that laissez-passer, because by then we were no longer using uniforms again. We were
25 no longer using military fatigue. Everybody was free and wearing civilian.

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1 Q. [15:33:53] Let's just sort out these names and we'll get the dates.

2 The dates are known, and I can recite them for your Honour. We have them available.

3 PRESIDING JUDGE TARFUSSER: [15:34:01] No, no, but just the period and it's okay.

4 MS PACK: [15:34:03] Yes, but just a reference point so I can certainly elicit from the
5 witness, from Mr Tarlue.

6 Q. [15:34:08] So you've spoken now just about Commander Sako. That was S-A-K-O.
7 Commander Sako. Now, it was he you told us just now who gave you the laissez-passers,
8 correct?

9 A. [15:34:24] The laissez-passers was first printed by Kadjo Miezou. But after
10 Kadjo Miezou left it was no longer valid. So it was now Commander Sako that reprinted
11 it, because he was the one who took over when Gbagbo came because Kadjo Miezou was
12 no longer there as the commander. He took another position, a different position.

13 Q. [15:34:49] Just so the record isn't confusing, you said Sako takes over from
14 Kadjo Miezou when Gbagbo came? Do you mean when Gbagbo came?

15 A. [15:35:00] No. Gbagbo was in power. But when they change the positions of the
16 generals, they brought Sako and Kadjo Miezou was sent to another position. So it was
17 Sako that renewed my laissez-passers.

18 So I still continued to use the laissez-passers. And all that time that I was there I was still
19 using the laissez-passers, because I always continued to go along with the people so that
20 they would understand what we were discussing.

21 Q. [15:35:35] And just so we're really clear, when Sako was in this position, by this time
22 it was Mangou, was it, who was chief of staff?

23 A. [15:35:44] Yes, it was Mangou, Mangou.

24 Q. [15:35:50] And Mangou was chief of staff.

25 MS PACK: I don't know if my friends are prepared to agree a date, but I can certainly

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- 1 give your Honours a date now that my friends might be able to agree, or we can do it by
2 email later, but that would certainly help in setting the time frame, your Honour.
- 3 PRESIDING JUDGE TARFUSSER: [15:36:09] What do you mean?
- 4 MS PACK: [15:36:11] The date upon which he was appointed chief of staff. I can tell
5 you now.
- 6 PRESIDING JUDGE TARFUSSER: [15:36:16] Yes.
- 7 MS PACK: [15:36:16] It's 13 November 2004.
- 8 PRESIDING JUDGE TARFUSSER: [15:36:20] Good. Good to know. Good to know.
- 9 MS PACK: [15:36:24]
- 10 Q. [15:36:24] Now, the laissez-passer, so I understand, it's first time, and we're talking
11 about the second time when it's reprinted. I want to ask you, please, when you received
12 the laissez-passer at this time, can you describe what it looked like?
- 13 A. [15:36:51] Well, the laissez-passer had, they had the État Major stamp on it. And it
14 was like they said, it was État Major laissez-passer, and it was, it had the Côte d'Ivoire, it
15 had the Côte d'Ivoire seal also and it had my photo on it. So it was like a real valid
16 document.
- 17 PRESIDING JUDGE TARFUSSER: [15:37:24] Excuse me. A question from the Bench:
18 But how is the feature of the laissez-passer in 2004 related to the charges? I have --
- 19 MS PACK: [15:37:40] Well, two things. I am going to show the witness a document and
20 ask him if he recognizes it in a moment. So I'm laying a foundation. And second point
21 is I need to ask him why he received a laissez-passer. And this is an intermediary period,
22 I said I was going to ask about three periods, intermediary period, very short time, but I
23 just want to cover it.
- 24 PRESIDING JUDGE TARFUSSER: [15:38:01] (Microphone not activated) -- don't
25 understand the importance of the laissez-passer.

1 MS PACK: [15:38:12]

2 Q. [15:38:12] Why did you receive a laissez-passer?

3 A. [15:38:18] The first time I received the laissez-passer was because I was always
4 travelling along with Oulaï Delafosse to receive the feeding for the group. So that
5 laissez-passer, at any time I got to Abidjan, I will use the laissez-passer for people to know
6 that I have the right to be in Côte d'Ivoire and that laissez-passer was helping me because
7 I cannot be working along with government using a refugee card. It would have been
8 difficult for me.

9 So the laissez-passer was not a military ID card. It was just a pass, a military pass. And
10 when the military give you a pass from the government, it was more valid than the ID
11 card, because they will see the stamp on it at that time and so we were responsible for
12 transporting the feeding for our, for our crew. So we needed a laissez-passer. I cannot
13 be working for the government, then fighting on their behalf whilst I carry a UN
14 document. So it was the laissez-passer that was very important in that vein. So I used
15 to carry the laissez-passer for such importance.

16 Q. [15:39:49] And just to finish describing this laissez-passer, you said it had your photo,
17 a stamp. Do you recognize -- were there any images on it?

18 A. [15:39:58] Well, I have my photo on the laissez-passer. I have my picture there,
19 everything. But I think the thing that you are holding there was not the laissez-passer.
20 It was, it was a document that the État Major used to give us annually. Every end of year
21 they would prepare that you would see Gbagbo's picture there and you would see some
22 other things there.

23 So the person who used to write your numbers, your order number was the document that
24 he prepared. So that is not a laissez-passer.

25 Q. [15:40:51] Well, I better show you a document?

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1 A. [15:40:57] Okay.

2 Q. [15:40:57] It's tab 38, and the Prosecution will show this, because it's redacted, it's a
3 page of a report, the report is at CIV-OTP-0027-0304. And the page number is 383 -- 0383,
4 but we're not going to look at that on the eCourt.

5 The Prosecution, if they could be handed the evidence control? Thank you. It's on
6 evidence 2 on the controls. Can you just take a look at this document. I appreciate you
7 have said you cannot read and write, so I just want you just to look at it, if there is -- if it's
8 a document you recognize? Take your time.

9 A. [15:42:24] This picture is not mine. This one is not from État Major. The one that I
10 was using had a line in the middle. It was just, it was just a straight something. It was
11 not something like a booklet that you could open. It is not -- it was not booklet-like. It
12 was something that was just shaped like a normal ID card. And I decided to laminate it
13 myself from État Major. So this is just something different. This is not from État Major.
14 The one that I printed was the diary, the diary that I used to write my numbers in.
15 This particular one even before the war, I lost everything. I lost everything. I don't
16 even have them any longer. So this is not part of it.
17 So if somebody might have given you this, I must tell you that this is not -- this is not mine.
18 And even if we have the opportunity to meet people like Kadjó Miezoú, he would tell you
19 that this is not -- this is not for me. It was after the war that they started printing things
20 like this for the GPP and some other things. But this is not part of my own documents.
21 And mine was a straight one like a normal ID card, and they gave me and I laminated it
22 myself. And it was not like a booklet. I did not use this before.
23 Q. [15:43:57] Okay. So can you help us with what this is? Do you know what this is?
24 Or if you can't help us, don't worry.
25 MR O'SHEA: [15:44:09] I think at this point I'm going to object.

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- 1 THE WITNESS: [15:44:12] (Interpretation) No, I don't know about it so I can't say
2 anything about it.
- 3 MR O'SHEA: [15:44:16] Yes. Well, there is really -- yes, well, there you go.
- 4 PRESIDING JUDGE TARFUSSER: [15:44:21] No. But the question, the initial question
5 was: Can you recognize it?
- 6 MR O'SHEA: [15:44:24] Yes.
- 7 PRESIDING JUDGE TARFUSSER: [15:44:25] So yes or no, that was it.
- 8 MR O'SHEA: [15:44:28] Well the point is he doesn't recognize it.
- 9 PRESIDING JUDGE TARFUSSER: [15:44:31] No, no, no, I do --
- 10 MR O'SHEA: [15:44:32] And he can't go any further with this document.
- 11 PRESIDING JUDGE TARFUSSER: [15:44:34] No, no, but he answered saying "It's not
12 mine." But he could recognize it in another way. But now it's over. I think it's done,
13 we're through.
- 14 MR O'SHEA: [15:44:43] Yes. Yes, if my friend is not asking any more questions about
15 this document, we're done.
- 16 PRESIDING JUDGE TARFUSSER: [15:44:48] I don't know.
- 17 MR O'SHEA: [15:44:48] If she is, I'm objecting.
- 18 MS PACK: [15:44:50] Well, Perhaps object when I ask the next question that's
19 objectionable. Because that was it for me. Thank you, your Honour.
- 20 Q. [15:44:58] Now, if we can just move on from this.
- 21 A. [15:45:02] Mm-hmm.
- 22 MS PACK: [15:45:04] We're going to leave this time frame soon, your Honour. I
23 appreciate we spent a long time on this period.
- 24 PRESIDING JUDGE TARFUSSER: [15:45:11] We did indeed, yes.
- 25 MS PACK: [15:45:13]

1 Q. There are just a couple of things I should clear up before we move on. So I don't
2 want to confuse you by coming back and forth and back, so there is a few things I want to
3 clear up with you, just to clarify.

4 A. [15:45:26] Mm-hmm.

5 Q. [15:45:31] Now, just on the topic, just before we leave the operations in 2002 and
6 2003, you spoke about Delafosse and you said that he took over from Digbeson, I think I
7 pronounce it right. And let me ask you this, you've talked about the group of Liberians
8 capturing places under Yedess. So can you help me understand was Delafosse, was he
9 under Yedess or how did they work?

10 A. [15:46:28] Delafosse was working under Yedess. How would Delafosse be ahead of
11 the commander? It was the commander who was taking care of the whole battalion.
12 Colonel Yedess was in charge of the whole barracks and he was assisted by captain
13 Doumbia. And by then they were still working with Yedess.
14 But Delafosse was more closer to us more Yedess, because Yedess was a senior man. We
15 knew Oulaï Delafosse before Yedess and Oulaï Delafosse was working under Yedess.
16 But to us he was more closer to us than Yedess. But when it comes to the issue
17 comparing Delafosse to Yedess, Yedess was the senior man more than Delafosse.

18 Q. [15:47:19] And on operations, when you were describing these operations, were you
19 just on your own, the Liberians, doing these operations or were there other groups
20 worked with you?

21 A. [15:47:37] We had the Ivorian soldiers, because if you say you are taking the
22 Liberians along to fight, they did not known the terrain or the country well. We were
23 working along with the Ivorian soldiers. We were not working in isolation.

24 Q. [15:48:02] Another question around this time, before we move forward, does the
25 name FLGO, does that mean anything to you?

1 A. [15:48:15] That was the time when we came from Liberia, we heard of FLGO, Force
2 LIMA. Those codes were for the Ivorians. I did not know much about them. That was
3 when we were in Guiglo, because when we left, he was trying to -- they were trying to put
4 things in order to help the situation. They got those codes, not us.

5 Q. [15:48:48] Just help me with this maybe if you know. Do you know who was the
6 head of FLGO?

7 A. [15:49:03] No, I did not know him.

8 Q. [15:49:05] Let me ask you this, just some names. The Liberians who were with you,
9 can you help me, please, with some names of some of the Liberians who were with you
10 and part of the -- also part of your group? You've told us about --

11 A. [15:49:31] Well, under normal circumstances I was not a commander. It was just
12 because all of us, we are together, and we are doing things in common. We are --

13 THE INTERPRETER: [15:49:42] Your Honour, could the witness be asked to go slowly
14 over the names.

15 PRESIDING JUDGE TARFUSSER: [15:49:46] Slow.

16 THE WITNESS: [15:49:48] (Interpretation) They were the leaders. So I cannot tell you
17 anything that I was controlling a group. I was getting my information from commanders
18 like Baygboe, Basa Ike, Uncle, John Garan. These were the people. But the reason why
19 we came to know those names, when the war started in Ivory Coast, all these people knew
20 me in Guiglo. I was, I was a senior person, but I was not a senior person for this group.
21 I was there before them. I was there with them, but I was not controlling the group.
22 If you, if you are a good fighter, yes, they will put you in charge of a battalion. But the
23 commanders who are Baygboe, Kai Farley, they were the chiefs. No, I was not in a
24 position in which I could know everybody's name at that time.

25 Q. [15:50:56] No problem. We just will go to some of the names that you just

1 mentioned and just to make it clear for the record and write it down.

2 A. [15:51:10] Okay. No problem.

3 Q. [15:51:11] You say that Kai Farley was a commander?

4 A. [15:51:21] Kai Farley was not just a commander, his bro -- Baygboe was his brother.

5 So he never used to go frequently to the frontline like we used to do. His brother was a

6 commander. So we just respected him because of that reason. General Baygboe,

7 General Yeme, Bob Marley, and the others, they were the commanders. Kai Farley was

8 just in between because his brother had a senior position.

9 Q. [15:51:54] Take it slow when you say the names because we all need to try to
10 understand. So I'll just do it again. The other name you said was General Yeme. I
11 think you mentioned him earlier, Djeon Yeme, same person, yes?

12 A. [15:52:12] Yeah, that's the same person.

13 Q. [15:52:14] And then I think you said also Bob Marley?

14 A. [15:52:17] Yes, Bob Marley.

15 Q. [15:52:20] Same, same as before?

16 A. [15:52:22] Yes.

17 Q. [15:52:23] And then I think you said earlier just now, did you say John Garan?

18 A. [15:52:31] Yes, John Garan was part of the team.

19 Q. [15:52:33] Was he a commander?

20 A. [15:52:36] Yes.

21 Q. [15:52:39] Anyone else that you remember?

22 A. [15:52:51] Well, I have just given the name John Garan, Uncle, Djeon Yeme and the
23 rest of them. How do they call the next person? Philip Palier, Philip Palier.

24 Q. [15:53:13] Philip Palier?

25 A. [15:53:15] Philip Palier, Bush Dog.

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1 Q. [15:53:22] Okay. I can spell Philip. Palier we'll have to do phonetic. And Bush
2 Dog.

3 And does Bobby Sarpee, does that mean anything to you?

4 A. [15:53:34] Bobby Sarpee.

5 Q. [15:53:38] He was a commander?

6 A. [15:53:38] Yes, yes.

7 Q. [15:53:39] And these men, were they Liberian?

8 A. [15:53:45] Yes, they were Liberians. They were all Liberians.

9 Q. [15:53:50] And their ethnicity?

10 A. [15:53:56] Krah.

11 Q. [15:54:01] Did you have any men under you, under your command?

12 A. No, no, no.

13 MR O'SHEA: [15:54:07] He's answered that.

14 THE WITNESS: [15:54:09] (Interpretation) It was just a group.

15 MS PACK: [15:54:12]

16 Q. [15:54:13] Does the name Mission mean anything?

17 A. [15:54:21] Yes. Mission, yes. But mission was not a commander. He was just an
18 ordinary fighter like me.

19 Q. [15:54:29] Okay.

20 A. [15:54:32] We were best of friends. We were best of friends.

21 Q. [15:54:35] Do you know his real name? Is that an alias, "Mission"?

22 A. [15:54:42] It was Mission. It was Mission, that was what we knew for him. That
23 was his name.

24 Q. Okay.

25 A. It only happened that during the fight people used to call me Junior Gbagbo, Junior

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1 Gbagbo. I knew -- I know I'm Junior Tarlue Junior. I'm Tarlue Junior. And they say
2 Baygboe, Baygboe also. Those are -- those were all fighting names. Everybody took
3 fighting names, nicknames. So I only know that of his name. I really do not know his
4 family name. Yeah, I did not take any time to ask him about his family also.

5 Q. [15:55:24] No problem.

6 A. [15:55:26] Okay.

7 Q. [15:55:26] And He was Liberian as well, and what was his ethnicity?

8 A. [15:55:29] Yes, Krahn.

9 Q. [15:55:30] Okay. I just wanted to get the spelling right for Philip Palier. It was P
10 for Philip, P-H-I-L-I-P. And Palier, P-A-L-I-E-R. And I am told that I have misspelt
11 Kadjo Miezou several times now and I should have spelt it K-A-D-J-O and then
12 M-I-E-Z-O-U.

13 MS PACK: Your Honours, I was going to move to another topic and I could start it in
14 two minutes, but I wonder whether now might be a convenient time for your Honours.

15 PRESIDING JUDGE TARFUSSER: [15:56:20] No. I think we stop it here for today and
16 we resume tomorrow at 9.30.

17 So you will have time to rest and tomorrow at 9.30, we are back here. Yes, please.

18 THE WITNESS: [15:56:32] (Interpretation) Yes, I really have something to say. When
19 I arrived, I have not been treated well. So, so this is something I want to clarify to
20 everybody to understand. I have not been paid a dime for me to come here and testify.
21 I have a very serious problem at home. Before I left to come here, they told me that I was
22 coming back on the 14th. And they took my passport, kept my passport with them. And
23 I am in need of my passport and they kept my passport. Since I left here, I have never
24 received my passport on my return. It's only friends and family that are taking care of
25 my own immediate family.

1 And the other people who they called from Abidjan, they travelled here and everything
2 was set for them. But for me, I have not been treated well since I came here. And since
3 I came, I have not rested. I have come straight to the Court. And then, even up to this
4 moment, I have not rested. Each -- I want to believe each and every one of us here have
5 families. So, if I am coming to the war criminal courts to testify, I, I want everything to
6 be set. Besides, the people who have been coming from Abidjan, for me in particular,
7 they have not treated me well.

8 And here I think I must put my mind together. I put everything together so that I can
9 able -- I can be able to take my time and do everything correctly. But since -- and I have
10 come here to say something very good for this Court to understand, something clearly for
11 this Court to understand, but to be frank, I have not been treated fairly and this is what I
12 want to tell you.

13 Yes, when I was in the flight, I had that -- I had some ear problem in the flight. I had a
14 fire -- a fire problem also sometimes back in my life. And since I have been here, they
15 have not given me anything. And I have family, I must take care of my family.

16 The whole world came here to watch what is happening.

17 PRESIDING JUDGE TARFUSSER: [15:59:08] When you say, "They did not treat me
18 well," they who?

19 THE WITNESS: [15:59:16] (Interpretation) The security people that I met here, that
20 they said I was going to come here, they never told me that they were going to take my
21 passport. When I got to Senegal, they took my passport, and yeah, if I have my passport,
22 I can be using my passport to do some other things. But I have been sick through all this
23 time I left here. But I have not been treated well. And my passport is with them.

24 PRESIDING JUDGE TARFUSSER: [15:59:43] Mr Witness, now you will be here for a few
25 days and you don't need the passport as long as you are here. For sure, you will have it

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- 1 back as soon as you leave the Court, when your testimony is finished. In any case, I
- 2 will -- in any case, I will try to make, to understand what happened. And so now we
- 3 finish for today. We will see you tomorrow. Have a rest and see you tomorrow at 9.30.
- 4 The hearing is adjourned. Thank you.
- 5 THE COURT USHER: [16:00:16] All rise.
- 6 THE WITNESS: [16:00:19] Thank you, Mr President.
- 7 (The hearing ends in open session at 4.00 p.m.)