

Trial Hearing
WITNESS: CIV-OTP-P-0176

(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 Gbagbo and Charles Blé
5 Goudé - ICC-02/11-01/15
6 Presiding Judge Cuno Tarfusser, Judge Olga Herrera Carbuccion and
7 Judge Geoffrey Henderson
8 Trial Hearing - Courtroom 1
9 Tuesday, 4 April 2017
10 (The hearing starts in open session at 9.34 a.m.)
11 THE COURT USHER: [9:34:07] All rise.
12 The International Criminal Court is now in session.
13 Please be seated.
14 PRESIDING JUDGE TARFUSSER: [9:34:43] Good morning. Good morning to
15 everybody.
16 Good morning, Mr Wagemakers.
17 Good morning, Mr Witness; or bonjour le témoin (Interpretation) Good morning,
18 Mr Witness.
19 WITNESS: CIV-OTP-P-0176
20 (The witness speaks French)
21 THE WITNESS: [9:35:05] (Interpretation) Good morning, Mr President.
22 PRESIDING JUDGE TARFUSSER: [9:35:09] Mr Witness, we start today with your
23 testimony. But before obviously giving the floor to the parties for their questions
24 and your answers, we have to do some preliminary things. First of it is your
25 complete identification, and to this effect I ask you to give us your complete name,

1 date and place of birth.

2 THE WITNESS: [9:36:00] (Interpretation) I am Mr Yaké Évariste, born on 25th of
3 the tenth month 1968 in Man, Côte d'Ivoire.

4 PRESIDING JUDGE TARFUSSER: [9:36:22] And where is this place, in the north,
5 south, east, west?

6 THE WITNESS: [9:36:32] (Interpretation) It is in the west of Côte d'Ivoire in the
7 Tonkpi region.

8 PRESIDING JUDGE TARFUSSER: [9:36:47] And what is your nationality? Are you
9 an Ivorian citizen?

10 THE WITNESS: [9:36:51] (Interpretation) Yes, I am an Ivorian citizen.

11 PRESIDING JUDGE TARFUSSER: [9:36:59] Can you tell us what you are doing,
12 what's your occupation now and at the time of the crisis, say, end 2010, beginning
13 2011?

14 THE WITNESS: [9:37:11] (Interpretation) Currently I am original councillor in
15 Tonkpi. During the crisis I was in the cabinet of Franck Guéï, who was an advisor of
16 the president in charge of rural health, and I was a chargé d'études in his cabinet.

17 PRESIDING JUDGE TARFUSSER: [9:37:48] Thank you.

18 So now I give you some information. The first one is, as you might have learned,
19 that we will all here call you "Mr Witness." This is normal practice. We will not call
20 you by name but by the appellation "Mr Witness."

21 Then second is the possibility of self-incrimination or the issue of self-incrimination.

22 The Court has assigned you a lawyer, which is Mr Wagemakers sitting beside you, to
23 provide you with all necessary legal advice about possible self-incrimination, this
24 because the Prosecutor has indicated to the Chamber that assurances under what we
25 call Rule 74 are appropriate in your case.

1 So if anything, if any problem, if any doubt arises or you think you have a problem or
2 a doubt, you can obviously speak and confer with Mr Wagemakers.

3 In any case, the Chamber gives you the assurance pursuant to Rule 74(3) of the Rules
4 of Procedure and Evidence that your testimony will not be used either directly or
5 indirectly against you in any subsequent proceedings before this Court, except
6 possible proceedings under Article 70 and 71, which are the offences against the
7 Court in case you do not say the truth. So just to repeat myself, if at any time a
8 question is asked to you that could lead to your self-incrimination, we will hear your
9 answer in private session. Private session means that only here in this courtroom we
10 know about it or we hear you; and in any case you yourself are obviously responsible
11 to call, to ask through your lawyer, through Mr Wagemakers private session if you
12 think you need them. But in any case the other parties, the questioning parties are
13 responsible for requesting themselves private session prior to asking questions which
14 may lead, which could lead to your self-incrimination. And obviously also duty
15 counsel can intervene if he deems it appropriate.

16 Have you understood this?

17 THE WITNESS: [9:41:52] (Interpretation) Yes, Mr President.

18 PRESIDING JUDGE TARFUSSER: [9:41:57] Now another thing I wanted to tell you,
19 another information I want to give you is the one related to the interpretation.

20 So I'm speaking slowly, not because I cannot speak faster, but because we have to take
21 care of the interpreters and the court reporters. They have to interpret properly and
22 completely what we all are saying in here and write it down in realtime. Therefore it
23 is needed that we speak slowly, and even more, that after a question is posed to you,
24 you respond, you wait a couple of seconds before responding. You have to wait
25 until the question is completely translated before responding. This makes it a bit

1 slower, the whole proceedings, but we need this to have a correct translation,
2 interpretation. This is even more important when it comes to some in here which
3 will question you in your own language, in French, it's even more important to be
4 aware that you have to slow down.

5 So after this preliminary information we come closer to the testimony itself. And
6 you are obviously aware that this Chamber has been established to try the case of the
7 Prosecutor versus Mr Gbagbo and Mr Blé Goudé. Your role as a witness is to assist
8 us, to assist the Chamber and to assist all of us in the finding of, in the search of the
9 truth.

10 Therefore, you will be asked questions by the parties, meaning by the Office of the
11 Prosecutor, by the Defence for Mr Gbagbo and then the Defence for Mr Blé Goudé
12 and maybe also by the judges, and if at any point you have some concerns, you would
13 like a break, you are tired or whatever, you have any needs, you just address me and
14 we will try to solve the problems. But what you have to do is to answer the
15 questions and to answer them truthfully. You are not here to take part in this trial,
16 but just to inform from your point of view in truthful manner to us following the
17 questions you are asked.

18 So in order for you to, before we start, you have to make a solemn undertaking to the
19 effect that you will tell the truth and, therefore, I ask you to read the formula you
20 have in front of you.

21 THE WITNESS: [9:46:06] (Interpretation) Solemn undertaking: I solemnly
22 declare that I shall speak the truth, the whole truth and nothing but the truth.

23 PRESIDING JUDGE TARFUSSER: [9:46:25] Thank you very much. Now, before
24 giving the floor, before giving the floor now to the Office of the Prosecutor for its
25 questioning, I have to inform you that giving false testimony is an offence against the

1 Court and as such punishable.

2 Okay. I see that you have understood. I see it from your expression. So I think
3 you are ready to start the questioning and the answering. Okay.

4 Therefore, I give the floor to the Office of the Prosecutor. Mr Garcia.

5 MR GARCIA: [9:47:13] Good morning, Mr President, your Honours.

6 QUESTIONED BY MR GARCIA: (Interpretation)

7 Q. [9:47:22] Good morning, Mr Witness.

8 A. [9:47:23] Good morning.

9 Q. [9:47:26] Can you hear me well?

10 A. [9:47:28] Yes.

11 Q. [9:47:33] Just to remind you that I will begin the examination-in-chief now.

12 And when I ask you a question, please remember what the Chamber has told you, to
13 pause for 5 seconds before answering. But take your time, because we all tend to
14 want to answer quickly.

15 Have you understood?

16 A. [9:48:00] Yes.

17 Q. [9:48:01] Mr Witness, we met briefly last week. I am a trial attorney at the OTP,
18 and I'm going to ask you questions. And I would simply like to tell you that if you
19 do not understand any of my questions for any reason at all, please do not hesitate to
20 interrupt me and I will be able to rephrase and clarify; is that okay?

21 A. [9:48:36] Yes.

22 MR GARCIA: [9:48:40] Your Honours, just for the record I noticed while your
23 Honour was asking the witness questions, that's at page 2, lines 20 to 23, there is a
24 part of the testimony of the witness missing regarding, it's in the French transcript
25 actually, regarding his employment in 2010-2011. I think there has been a note sent

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1 in that regard, just --

2 PRESIDING JUDGE TARFUSSER: [9:49:06] Otherwise you ask him.

3 MR GARCIA: [9:49:08] Yes, that's exactly, so I'm going to go on that point just so
4 that would be clear.

5 PRESIDING JUDGE TARFUSSER: Okay.

6 Q. [9:49:14] Mr Witness, the Chamber asked you questions about your current
7 occupation. And I would like to clarify everything, because there are things lacking.
8 Are you in the employment of a political party?

9 A. [9:49:35] Yes, I am in a political party. And I am a member of the cabinet of the
10 secretary general of the RDR, my party.

11 Q. [9:49:51] Are you employed under someone in particular?

12 A. [9:49:58] The secretary general of the RDR, it is a party, not someone in
13 particular. He's the boss of the party, and I'm a member of that party where I
14 militate. I am in charge of the new recruits, new members into the party.

15 Q. (No interpretation)

16 PRESIDING JUDGE TARFUSSER: [9:50:23] You have to slow down with the speed
17 and then the 2, 3 seconds -- 5 seconds, it's a little bit long, but a couple of seconds I
18 would really urge you also to observe them. Thank you.

19 MR GARCIA: [9:50:38] I'm well advised. Thank you, your Honour, for the
20 reminder.

21 PRESIDING JUDGE TARFUSSER: [9:50:41] I'm just anticipating the protests of the
22 interpreters.

23 MR GARCIA: [9:50:50] (Interpretation)

24 Q. [9:50:51] Mr Witness, do you work for someone in particular?

25 And please pause for 5 minutes -- 5 seconds, rather, before you answer.

1 A. [9:51:09] I work for the party, and I'm in the cabinet of Minister Amadou
2 Soumahoro.

3 Q. [9:51:22] Just to be clear, do you also work with Mr Joël N'Guessan?

4 A. [9:51:36] Yes. Mr Joël N'Guessan has a consulting firm, and from time to time I
5 work with him to identify clients.

6 Q. [9:51:58] You say that you are in charge of new recruits. What specifically do
7 you do, briefly?

8 A. [9:52:03] Talking about new members, we have to receive individuals who want
9 to start militating within the RDR, and I am a member of the RDR, and I am
10 responsible for receiving these people, explain to them how we stay together and to
11 tell them that they have made a good choice.

12 Q. [9:52:43] Thank you for the explanation, Mr Witness.

13 And for approximately how long have you been doing this? Take a few seconds
14 before answering, Mr Witness.

15 A. [9:53:06] Ever since the secretary general, Minister Amadou Soumahoro,
16 appointed me in his cabinet.

17 Q. [9:53:24] Is it more than one year or less, that is since that appointment?

18 A. [9:53:38] I cannot tell you precisely, but it is not more than a year.

19 Q. [9:53:48] Do you also have a movement?

20 A. [9:53:58] Yes.

21 Q. [9:53:59] And briefly what is the movement and its objectives?

22 A. [9:54:12] It is called Horizon 2020. And the objective is to reconcile Ivorians
23 and to bring the young people together and speak with each other. They have to
24 look to the future to ensure that what happened in our country should never happen
25 again. It is a movement of peace, love and reconciliation.

1 Q. [9:54:50] And, Mr Witness, when you answered the Chamber's questions at the
2 beginning, you said that in 2010-2011 you worked for Mr Franck Guéï; is that correct?

3 A. [9:55:09] Yes.

4 Q. [9:55:25] Can you tell us briefly what your position was in the cabinet of Mr
5 Franck Guéï at that time?

6 A. [9:55:35] Dr Franck Guéï was the elder son of the late General Guéï. And
7 before being my boss he was a brother and friend ever since we were young. He
8 was -- when I was in France he was in the United States, and when I returned finally
9 in 2006 he arrived after me and he was appointed by His Excellency President
10 Laurent Gbagbo as special advisor responsible for rural health.
11 Dr Franck Guéï called me to his cabinet because his duties involved travelling to the
12 entire Côte d'Ivoire, but specifically to the west, where the health infrastructures were
13 degraded or had deteriorated.
14 And may he rest in peace, but Dr Franck Guéï did not speak the local language of the
15 west region, and that is Yacouba, so Franck called me and he said, "Yaké, I need you, I
16 need your experience. You speak very well the local language. You are the son of a
17 chief. I would like to have you be an interpreter so as to convey Laurent Gbagbo's
18 message to our parents and relatives who wants -- and he wants development in
19 everything related to maternities and hospitals because everything has deteriorated
20 and is in a miserable state."

21 Q. [9:57:48] Very well. You said you worked in his cabinet in 2010. But for how
22 long had you been working with him?

23 A. [9:58:00] I spent a long time with him. I can say that before my appointment
24 we were always together. I returned in 2006, and before my appointment we were
25 together. It was after all the missions that he decided to have me appointed officially

1 in his cabinet at the presidency of the republic.

2 Q. [9:58:29] Very well. And when you were officially appointed, for how long did
3 you stay in that position, how many months?

4 A. [9:58:47] I cannot remember precisely, but I believe it was less than one year.

5 Q. [9:58:54] Correct me if I am mistaken, but was Mr Franck Guéï subsequently
6 appointed minister of sport December 2010?

7 A. [9:59:07] Yes. After the elections, Mr Franck Guéï was appointed minister of
8 sports.

9 Q. [9:59:16] Just to be clear, did you continue working with him after he was
10 appointed minister of sports by President Gbagbo?

11 A. [9:59:30] I was always by his side. He already had a cabinet. The director de
12 cabinet was there, and he had told us to wait for his offices to be set up. And during
13 that time we were always in the residence with him. Unfortunately, it lasted only
14 two to three months, I believe.

15 Q. [10:00:03] For things to be clear, Mr Witness, you specifically did not occupy a
16 position with him, with Mr Franck Guéï whilst he was minister of sports, is that
17 correct, an official position, that is, within the government?

18 A. [10:00:22] That is correct.

19 Q. [10:00:23] Now, Mr Witness, I would like to hark back somewhat. From what
20 I've understood you were born in the Côte d'Ivoire. But if I read through your
21 statement correctly, you left for Europe at a given moment in time for France and
22 Switzerland; is that correct?

23 A. [10:00:46] Yes.

24 Q. [10:00:46] Can you remember from what year to what year you spent time in
25 France and Switzerland before returning to Côte d'Ivoire?

1 A. [10:01:09] I left for Europe in 1989. I remained, I was in Neuchâtel and in
2 Gorgier Saint-Aubin, I stayed there for a while. It was very cold and we couldn't
3 work. We were talking about President Houphouët-Boigny, and one morning I just
4 got up and I thought to myself -- I went back to Côte d'Ivoire.
5 And when I came back, I spent some time and then I went back to France, I went to
6 Paris. I remained in Paris. And then I went to Nantes, and I lived in Nantes for the
7 entire duration. I had my first son there in Nantes. I had my carte de séjour, my
8 residence permit. I lived in Nantes for a while and then I came back to Paris.
9 I lived in --

10 THE INTERPRETER: Inaudible.

11 THE WITNESS: (Interpretation) -- and I remained there for a while. And in 2006,
12 when I lost my mother, I thought my father had remained on his own, so I decided to
13 go back to Côte d'Ivoire for good.

14 MR GARCIA: (Interpretation)

15 Q. [10:02:39] Now, Mr Witness, whilst you were in France, did you meet any
16 minister whomsoever?

17 A. [10:02:57] Yes. I had a restaurant, and via one of my young brother
18 friends -- well, I say brother because we were all from Côte d'Ivoire -- through this
19 person Serge Lida, who went to university in Côte d'Ivoire, he was a professor in the
20 Côte d'Ivoire, he allowed me to meet Moïse Lida Kouassi, a minister of state.

21 Q. [10:03:36] So Mr Serge Lida, did he have any link with Mr Lida Kouassi?

22 A. [10:03:56] Yes, of course. I believe that it is either his uncle or his elder brother,
23 but they are both from the same family.

24 Q. [10:04:08] Could you briefly tell us what you discussed when you crossed paths
25 with the minister of state, Mr Lida Kouassi Moïse? What did you talk about? Did

1 you talk?

2 A. [10:04:34] Yes, we did. When I met the minister of state, Moïse Lida Kouassi, I
3 took the courage to tell him that I was not happy and that it was he or the government
4 in place that had killed General Robert Guéi. I told him face to face.

5 And he looked at me for about 10 minutes with extreme Olympian calm, Olympic
6 calm, and he said no, that he had not killed General Robert Guéi.

7 And I said: But you were on the TV, and there was some information received.

8 But he said he had nothing to do with late General Robert Guéi and his death.

9 So we had a discussion, because I had some friends, investors who were interested in
10 Côte d'Ivoire, Mr Jack Granger received him. And he said that he would invite us to
11 Côte d'Ivoire for us to see for ourselves. According to what he said, neither he nor
12 President Gbagbo nor his government killed anyone whomsoever, especially General
13 Robert Guéi.

14 And I said: Well, let's see what the future holds. We'll hold you to that.

15 And then he invited us.

16 Q. [10:06:48] For things to be a little clearer, what was the reason why he invited
17 you, the aim to your knowledge?

18 A. [10:06:58] Firstly, in order to receive our friends who were very interested in
19 Côte d'Ivoire, and that pleased me, because if they managed to work in Côte d'Ivoire,
20 then it goes without saying that I would be paid dividends and; secondly, he said to
21 me that he was inviting me because he thought I was courageous to tell him face to
22 face truths that no one had dared tell him and as a minister of state at the time.
23 So he invited me, and he said that President Laurent Gbagbo had a programme, had a
24 new dynamic, and he wanted me to come because I was a courageous person, and he
25 wanted me to come and help President Laurent Gbagbo to be part of his programme,

1 and that it was he that was in fact the father of multiparty, the multiparty situation,
2 that he had a dream for Côte d'Ivoire.

3 Q. [10:08:22] And you accepted?

4 A. [10:08:26] Yes, I accepted. As I say, when I heard or listened to what
5 Laurent Gbagbo's programme was all about, notably that he had instituted a
6 multiparty situation, I knew having lived in France that democracy was based on a
7 system of a number of parties, so that Côte d'Ivoire had made a qualitative step
8 forward, especially for the west.

9 And he said: Give me the power, and I'll give it back to you.

10 Q. [10:09:23] So you say that in 2006 you went back definitively to Côte d'Ivoire.
11 Before 2006, did you or were you involved in any political activities elsewhere?

12 A. [10:09:41] Before 2006 in France, no.

13 Q. [10:09:47] And briefly with regard to your studies in Côte d'Ivoire, what did you
14 study?

15 A. [10:09:57] I went to College William-Ponty, the local school, where I studied
16 accountancy, and then I went to France in 1989.

17 Q. [10:10:23] If I understand you correctly, you did not do any further studies in
18 Europe?

19 A. [10:10:29] No. In Europe, not at all. I had registered at the Benedictine school
20 in Neuchâtel, but I didn't do any further studies. Rather, I opted to go to France in
21 order to be able to work and to be, you know, legit, because living in Europe, you
22 need to have your papers, as they say.

23 Q. [10:10:56] So you went back to Côte d'Ivoire in 2006. Did you find somewhere
24 to live or did somebody help you find accommodation?

25 A. [10:11:13] Well, as I said to you, Minister Lida invited me. He helped me. He

1 put me up in a hotel. And then after the funeral of my mother, I took an apartment.
2 I lived in Yopougon, because my mother had her house, but I didn't want to stay
3 there, I am the eldest of my family, I didn't want to stay there. I took an apartment
4 for myself in which I lived.

5 Q. [10:11:47] So you were living in Yopougon, in which neighbourhood
6 specifically?

7 A. [10:12:00] Well, I would call it -- some others call it Millionaire, but I call it the
8 cité de Quatre Villas. It's in Locodjoro, it's in Attécoubé, but in Yopougon -- well,
9 you feel like you're more in Yopougon from an administrative point of view. It's the
10 cité de Quatre Villas. That's where I lived.

11 Q. [10:12:28] Was it in that neighbourhood that you lived during the post-election
12 crisis as well?

13 A. [10:12:48] Yes, yes.

14 Q. [10:12:52] Did you not live elsewhere?

15 A. [10:12:56] No.

16 Q. [10:12:57] So you told the Chamber that you hail from Man, that is to say from
17 the administrative centre of the Tonkpi region as you underscored at the beginning of
18 your testimony.

19 Did you take part in any way in the creation of movements in that region?

20 A. [10:13:42] When I arrived, when I was living in the place I told you, the young
21 people from my region, students, younger brothers who were there set up what we
22 call the Jeunesse Unie pour la Developpement des Montagnes, JUDDDEM, and they
23 came and asked me to be the president of it. It was a movement of which I was the
24 president. It was set up firstly by young people and they were looking for a leader,
25 and I accepted to be the president, the JUDDDEM, Jeunesse Unie pour la

1 Developpement des Montagnes.

2 Q. [10:14:49] So we can understand by virtue of the acronym itself what the
3 objective was, but can you tell me how it worked?

4 A. [10:14:58] The JUDDDEM was a movement that aimed to organise young people,
5 women, and to get our relatives out of their lethargic state. We were supposed to tell
6 them that the more unified we are as young people, as women, as cultivators, then the
7 more in a position we would be to receive help from the state. Alone we would not
8 be in a position to benefit from what we were expecting from the state. There we
9 are.

10 Q. [10:15:47] Now, quite simply so that we are clear, were you or did you work in
11 the capacity of president of that movement?

12 A. [10:16:04] Yes, I was the president of that movement.

13 Q. [10:16:06] To your knowledge why did those young people approach you to be
14 the president?

15 A. [10:16:27] Because, firstly, as I said, I speak our dialect, our mother tongue very
16 well. I am somebody who, thanks to my father, knows our village and our customs,
17 and I am a descendant of the royal family governing the 70 or 68 villages of our
18 préfecture. And I had just come from France, I had just arrived from Europe, so I
19 was the ideal person in their eyes who had another vision with what I had seen in
20 Europe, and I could bring them that little something extra.

21 Q. [10:17:35] Are you in a position to tell us when this occurred? You arrived in
22 2006, but can you tell us when you were chosen as president of the JUDDDEM?

23 A. [10:18:15] I told you that, and I even told others that I have problems with dates.
24 Well, I think it was nearly a year after my arrival that they came.

25 Q. [10:18:39] So simply, if we are able to put a date on it, in time, does the

1 deployment of the first audiences foraines, 13 July 2006 as the date when those first
2 mobile courts were set up, the audiences foraines, does that ring a bell?

3 A. [10:19:07] Yes. Those mobile courts, audiences foraines, does ring a bell,
4 because I remember that during those mobile courts I was nearly killed in Man.

5 Q. [10:19:28] So to situate in time, correct me if I am wrong, you arrived in 2006
6 before the first mobile courts were set up?

7 A. [10:19:38] Yes. I arrived in 2006. My mother died on 26 or 27 May, before
8 Mother's Day. I arrived after that.

9 Q. [10:19:59] So if I understand correctly, it's approximately a year afterwards that
10 you became the president of the JUDDDEM; is that correct?

11 A. [10:20:15] Yes.

12 Q. [10:20:15] So after the JUDDDEM, did you take part or were you implicated or
13 involved in the creation of any other movement?

14 A. [10:20:34] Yes.

15 Q. [10:20:41] Which one?

16 A. [10:20:52] As the JUDDDEM was out on the ground organising the youth in a
17 very good fashion, I was requested, thanks to my younger brother Guillaume Gbato
18 who is a journalist of merit, to head up a movement by the name of COMAJMG,
19 C-O-M-A-J-M-G.

20 Q. [10:21:35] Are you in a position to tell us how much later or how much longer
21 after the JUDDDEM you were requested to take part in this COMAJMG?

22 A. [10:21:58] I can't tell you specifically. I might be mistaken, but as far as the
23 JUDDDEM is concerned, we were active out on the ground. I can't tell you, but maybe
24 less than a year.

25 Q. [10:22:27] Could you explain to us what this COMAJMG, what those letters refer

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1 to?

2 A. [10:22:35] It is the coalition des mouvements et des associations de jeunes de la
3 montagnes pour Gbagbo, the coalition of movements and associations of youths from
4 the mountains for Gbagbo.

5 Q. [10:22:57] And briefly once again, what was the objective behind this
6 movement?

7 A. [10:23:13] As its name indicates, it was a coalition. There was the FPI youth
8 headed up by Tonkpi, my younger brother Guillaume Gbato, and then there was the
9 JUDDDEM, and there were all of those who could recognise themselves in this
10 Laurent Gbagbo programme. And that's why they wanted to bring the forces
11 together, because we all have one and the same objective, being President Gbagbo
12 who we all have in common.

13 And so rather than have problems of leadership and overlapping, on the impetus of
14 Guillaume Gbato, there was Alain Gaoudé. There was the young Bieu Delphin from
15 Danané as well. All of those young leaders, and there was --

16 THE INTERPRETER: [10:24:18] Message from the interpreter. The witness is
17 rattling off names. Could he please slow down and spell them. Thank you.

18 PRESIDING JUDGE TARFUSSER: [10:24:26] Please slow down and spell the names
19 so that we understand them better and we can write them down correctly. Thank
20 you.

21 THE WITNESS: [10:24:47] (Interpretation) Under the impetus of Guillaume Gbato,
22 as I was saying.

23 MR GARCIA: [10:24:54]

24 Q. [10:24:54] So it's G-B-A-T-O Guillaume; is that correct? You also mentioned
25 Alain Gaoudé, G-A-O-U-D-É, number 23 on the list. He was a federalist of the FPI,

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1 JFPI at the time. So we're going to go -- so he was a federal of the Jeunesse du front
2 populaire Ivoirien; is that correct?

3 A. [10:25:37] Yes, the FPI.

4 Q. [10:25:38] And what is the other name that you also mentioned as an individual
5 who was also part of that movement?

6 A. [10:25:45] There was the Keneun Honoré from the FPI.

7 Q. [10:25:53] And this is on our list that we transmitted, Kenor K-O-N-O-R,
8 H-O-N-O-R-E.

9 THE INTERPRETER: [10:26:07] Message from the interpreter. If counsel was to
10 refer to the number on the list it would help.

11 PRESIDING JUDGE TARFUSSER: [10:26:11] Mr Garcia, if you would refer to the
12 number of the list, this would also help the interpreters. Thank you.

13 MR GARCIA: [10:26:27] (Interpretation)

14 Q. [10:26:27] So it's number 40 on the list. And I can see that the name is, rather,
15 K-E-U-N-A-N; is that correct?

16 A. [10:26:42] Yes.

17 Q. [10:26:48] You said this was a person who was the federal of the FPI from the
18 Danané?

19 A. [10:26:57] He is the Zouan-Hounien, Zouan-Hounien.

20 Q. [10:27:04] Could you please spell this for us?

21 A. [10:27:06] Z-O-U-A-N dash H-O-U-N-I-E-N.

22 Q. [10:27:27] Now, Zouan-Hounien is in fact a department of the region of Tonkpi,
23 if I understand you correctly?

24 A. [10:27:46] Yes.

25 Q. [10:27:47] It would seem to me, Mr Witness, that you also made mention of

1 another name.

2 A. [10:27:54] Bieu Delphin.

3 Q. [10:28:06] Could you please for the record spell the family name?

4 A. [10:28:11] B-I-E-U Delphin.

5 Q. [10:28:23] And this Mr Bieu Delphin, which party did he represent?

6 A. [10:28:38] He was from, we say the movement of Mr Jean-Yves Dibopieu, the
7 SOAF.

8 Q. [10:29:02] I don't know whether this is the name you mentioned. Is that the
9 name SOAF, S-O-A-F?

10 A. [10:29:13] Yes.

11 Q. [10:29:13] Is that the Solidarité Africaine? And did you mention Jean-Yves
12 Dibopieu?

13 A. [10:29:21] He was the president of the movement and Delphin was his
14 representative in Danané.

15 Q. [10:29:32] For us to be clear in this regard, those individuals who were part of
16 the movement, are these people who were in that region of Tonkpi?

17 A. [10:29:52] All of those individuals, as myself, hail from Tonkpi, but they all lived
18 in Abidjan, as I did, and they would go there on each occasion.

19 Q. [10:30:18] And what was your position in that movement?

20 A. [10:30:23] They came and saw me after being referred by my young brother
21 Guillaume Gbato. He said we should bring the forces together to support President
22 Laurent Gbagbo. It was after that consensus that Guillaume Gbato told me "dear
23 older brother, we chose you to become the president of the COMAJMG and because
24 of your position with Dr Franck Guéï, you were able to visit all the areas of Tonkpi.
25 You were able to speak with everybody. We know that you are very good. You

1 have a great mastery of our language. You are our elder, and we would want you to
2 be that person that would prevent the battle or fight between the generations. So
3 you should be at the head of the COMAJMG."

4 Q. [10:31:59] Briefly, as the president, what were your daily duties?

5 A. [10:32:05] On a daily basis, well, that is a bit too much. But we had a
6 programme. There were students and so on. Everybody had their duties. Our
7 plans were to meet in the field and decide how to organise ourselves so that our
8 candidate, President Laurent Gbagbo, should be able to win. And we had to convey
9 the message of development of President Laurent Gbagbo. We would call each
10 other and we met generally during the weekends when we could, if I was not on
11 mission with Dr Franck and so on. But generally speaking, from Abidjan, we will
12 meet in Tonkpi so as to be more pragmatic in relation to our people.

13 Q. [10:33:10] And where was the official launching of your movement?

14 A. [10:33:32] I cannot tell you the precise date, but we did it in Yopougon, at the
15 Baron in Yopougon. And our guest of honour was Mr Damana Pickass. That is
16 through Mr Guillaume Gbato.

17 Q. [10:34:14] I understand that you cannot give us a precise date, but how long
18 after the creation or after you were appointed president that you made that launch?

19 A. [10:34:27] I repeat, I have problems with dates, but when I accepted, everything
20 was organised by my young brother, Guillaume Gbato. It was quite quick. It
21 didn't take too much time. And he called on Damana Pickass. I did not know him.
22 I met him for the first time. He came to us. We were in Baron in Yopougon, and so
23 we did the official launching. It did not take too long in any case.

24 Q. [10:35:08] As far as you can remember, did this take place in 2008?

25 A. [10:35:21] I do not remember. I know that it was at the Baron. I know the

1 place, not far away from the mairie of Yopougon. I know that Damana Pickass was
2 there.

3 Q. [10:35:39] And if I understand you well, the Baron is a bar; is that correct?

4 A. [10:35:46] The Baron in Yopougon is a location where you have several halls that
5 you can rent either for weddings, for events, for press conferences. This is a
6 premises, a location that you can use, you can rent for all sorts of activities. You
7 have to go and request from the manager and they would tell you such and such a
8 hall is occupied and will be free on a different day. That is how it happens.

9 Q. [10:36:31] You spoke about Mr Damana Pickass, who sort of sponsored or was
10 the Godfather. What does that mean precisely?

11 A. [10:36:54] This is simply political, a political thing, because he was from the
12 party of Mr Laurent Gbagbo. And most of those young people were members of the
13 youth wing of the FPI, and they wanted to invite him to make the occasion even more
14 solemn for the movement, even more credible, because Mr Damana Pickass was just
15 not anybody in the hinterland. He was someone of note. So they told me Mr
16 Damana Pickass would be there.

17 And I said, "Very well. He should come and give us a message. He should come
18 and support us to encourage us," and that is what happened.

19 Q. [10:37:49] You said Mr Damana Pickass was just not anyone. What do you
20 mean by that?

21 A. [10:38:07] Guillaume Gbato told me that he was one of the respected
22 collaborators of President Affi N'Guessan. He was also one of the young people
23 who could also meet, who was also meet President Laurent Gbagbo. He was more
24 in the office of the party of Laurent Gbagbo. He was a respected young person and
25 he was a close collaborator of President Affi N'Guessan.

1 Q. [10:38:48] Mr Witness, after having been appointed president of that movement,
2 did you come into contact with other people who also encouraged the electoral
3 campaign of Mr Laurent Gbagbo?

4 A. [10:39:42] First of all, my boss, Dr Franck Guéï, was aware of that. And
5 following our activities, I no longer remember the date, but one morning I received a
6 phone call from Mr Charles Blé Goudé, and he very politely asked me whether I
7 could meet with him. I informed my boss, Dr Franck Guéï, and he told me, "Go and
8 listen to what he has to say and then you will report back to me."

9 Q. [10:41:05] Now, going back to this conversation, this call from Charles Blé
10 Goudé, can you give us more details? I understand that he asked you whether he
11 could meet with you?

12 A. [10:41:22] Yes. He gave me an appointment in his office, not far away from the
13 Aghien mosque in Angré. He gave me the time. And when I informed Dr Franck,
14 then I went there on that day.

15 Q. [10:41:51] During the phone call, did Mr Blé Goudé tell you why he wanted to
16 meet with you?

17 A. [10:42:01] No. He said hello and very warmly and politely. I was already
18 very surprised. He said, "It is General Charles Blé Goudé." I was surprised and I
19 said, "Yes." And he said, "I would like to meet with you in my office," and he set the
20 time.

21 Q. [10:42:36] Let us situate this event in time. Do you remember when precisely
22 you received that phone call?

23 A. [10:43:13] I do not remember precisely.

24 Q. [10:43:17] Just to refresh your memory, Mr Witness, and I'm referring to
25 transcript 0062-0512, and it is tab 2 actually, and it is page 0528. Mr Witness, I am

1 simply referring to the transcript of your interview with the investigators of the Office
2 of the Prosecutor, and lines 567 to 570. T.

3 He question was, I'm being told to slow down, line 567, and I will quote you, "Blé
4 Goudé's call was end 2006, early 2007."

5 And your answer, "2007. 2007-2008."

6 "Okay. Okay."

7 And then your answer, line 570, "I can say around 2008, early 2009."

8 Does that refresh your memory?

9 A. [10:45:08] Listen, I could be mistaken, but what I'm saying is that I received a
10 call from Mr Charles Blé Goudé and he gave me an appointment in his office in Angré.
11 I can be mistaken about the dates. And I told the investigators that, that I'm sorry,
12 but I have that problem, even though I can confirm that I received the phone call.

13 Q. [10:45:48] Now, the venue of the appointment, where did you go to meet with
14 Mr Charles Blé Goudé?

15 A. [10:46:13] Let me repeat, in his offices in Angré, not far away from the Aghien
16 mosque, not far away from the Aghien mosque in Angré.

17 Q. [10:46:36] Can you help us in which neighbourhood precisely?

18 A. [10:46:42] It is part of Cocody. It is on the road from Sococé to Angré. It is
19 part of Cocody commune. There is the mosque there and his offices are on the other
20 side of the road next to a Shell petrol station.

21 Q. [10:47:20] And you say his offices, offices for what? Which offices?

22 A. [10:47:24] I saw his offices. I cannot tell you more than that. I can simply tell
23 you that there were people there, friends. I saw things related to communication, if
24 I'm not mistaken. I saw images.

25 Q. [10:48:01] You said things related to communication. Can you be more specific?

- 1 Do you remember something in particular?
- 2 A. [10:48:12] There were portraits of artists, images of artists.
- 3 Q. [10:48:32] Is that some sort of company?
- 4 A. [10:48:34] I am not able to say.
- 5 Q. [10:48:39] When you arrived at that location, who was present?
- 6 A. [10:48:55] There were a lot of people there, a lot of young people. There was a
- 7 young lady who welcomed me and who had me sit and wait at a location below.
- 8 Q. [10:49:30] How many people were there when you arrived, approximately?
- 9 PRESIDING JUDGE TARFUSSER: [10:49:40] How many people were there?
- 10 MR GARCIA: [10:49:43] I can leave that be, your Honour.
- 11 PRESIDING JUDGE TARFUSSER: [10:49:45] Thank you.
- 12 MR GARCIA: [10:49:48] (Interpretation)
- 13 Q. [10:49:49] Can you tell us whether you recognised any of the people who were
- 14 present there?
- 15 A. [10:49:59] Yes.
- 16 Q. [10:50:06] So tell us who was present.
- 17 A. [10:50:11] I recognised a young lady, Ms Gohi Bernadette. And I recognised
- 18 some young people.
- 19 Q. [10:50:25] Just one minute. You mentioned Ms Gohi Bernadette, and that is
- 20 number 28 on the list.
- 21 A. [10:50:37] Yes.
- 22 Q. [10:50:37] And who is that lady?
- 23 A. [10:50:40] She introduced herself as the protocol officer of the president, the
- 24 general, the president.
- 25 Q. [10:50:55] You said that you also recognised some young people. Who?

1 A. [10:51:18] I recognised Mr Koué Jean-Claude, for example.

2 Q. [10:51:31] Yes, that is number 46 on our list. And who was Koué Jean-Claude?

3 A. [10:51:41] I believe the lady said it was -- he was her boss. I believe he was a
4 fixer; a man who was able to do all sorts of things.

5 Q. [10:51:58] Did Mr Jean-Claude Koué belong to any movement?

6 A. [10:52:12] They were the henchmen of Charles Blé Goudé. I don't know
7 whether he belonged to a movement, but he was with Charles Blé Goudé.

8 Q. [10:52:30] What was Mr Charles Blé Goudé's movement?

9 A. [10:52:36] It was COJEP.

10 Q. [10:52:39] Did Mr Jean-Claude Koué have a particular duty or position within
11 the COJEP?

12 A. [10:52:55] I am not a member of COJEP, but I believe so.

13 Q. [10:53:00] Based on what you know, what was that position?

14 A. [10:53:05] The lady said that he was her boss. She was the protocol officer, but
15 I really do not know precisely what he was, but he was her boss.

16 Q. [10:53:24] As far as you can remember, was there a deputy secretary in charge of
17 organisation in COJEP at the time?

18 A. [10:53:56] Yes. I think it was Mr Koué.

19 Q. [10:54:00] Did you recognise anyone else on that day?

20 A. [10:54:05] If I remember correctly, I believe there was the young Gogon
21 Guillaume.

22 Q. [10:54:25] It is number 27 on our list. And what was the position of Mr Gogon?

23 A. [10:54:35] Based on what he told me, Mr Gogon was the representative of COJEP
24 in Danané.

25 Q. [10:54:46] Did you remember, did you recognise any other young people there?

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1 A. [10:55:04] I no longer remember, but there were young people there.

2 Q. [10:55:14] Now, what happened when you arrived there and you met with those
3 people?

4 A. [10:55:21] I waited. Charles arrived. I was taken to his office. He was there.
5 And I went in.

6 Q. [10:55:46] Please proceed.

7 A. [10:55:48] We greeted each other, and he told me that he had heard some very
8 good things about me and that he would want us to work for President
9 Laurent Gbagbo, to help President Laurent Gbagbo on the ground, in the field. And
10 I told him that I was with Franck Guéï. There were no problems at that level, but in
11 our area in the west, it was a bit difficult, because the towns and villages were far
12 away from each other. You could walk 12 kilometres, 25 kilometres, and it was not
13 easy. And I said I agreed to do the work, but he should be able to help us facilitate
14 our ability to go to the most remote villages to convey President Laurent Gbagbo's
15 message.

16 PRESIDING JUDGE TARFUSSER: [10:57:13] Just to recall, when was this? Is it
17 correct, 2006, this first meeting with Charles Blé Goudé?

18 THE WITNESS: [10:57:29] (Interpretation) No, your Honour. It was not 2006. It
19 was around 2008. But not 2006.

20 PRESIDING JUDGE TARFUSSER: [10:57:39] Okay. Thank you.

21 MR GARCIA: [10:57:53] Your Honours, I'd ask that we adjourn at this point. I'm
22 going to have another series of questions when I do come back.

23 PRESIDING JUDGE TARFUSSER: [10:58:05] Okay. So let's adjourn the meeting,
24 and just to remind you that the next session is only one hour because I have a
25 commitment. So we would close at 12.30 instead of 1, and then we go to 3 o'clock in

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1 the afternoon and we have ordinary session, okay. Thank you very much. The
2 hearing is adjourned.

3 THE COURT USHER: [10:58:32] All rise.

4 (Recess taken at 10.58 a.m.)

5 (Upon resuming in open session at 11.32 a.m.)

6 THE COURT USHER: [11:32:35] All rise.

7 Please be seated.

8 PRESIDING JUDGE TARFUSSER: [11:33:01] Good morning again, Mr Witness.

9 Good morning to everybody. I see that Maître Altit is not here, but I was advised
10 that we can continue. Thank you very much.

11 So I give the floor to the OTP, to Mr Garcia.

12 MR GARCIA: [11:33:27] (Interpretation)

13 Q. [11:33:28] Good morning again, Mr Witness.

14 A. [11:33:30] Good morning.

15 Q. [11:33:31] I have just a question before we continue. You said in your
16 testimony that you went to a certain location in a company with telecommunications,
17 if I understood correctly, to meet with Mr Blé Goudé. Did the company -- was the
18 company called "leaders team"?

19 A. [11:33:52] Yes.

20 MR ZOKOU: [11:33:53] (Interpretation) Mr President, just for the attention of my
21 learned friend, he did not talk about a telecommunications company.

22 MR GARCIA: [11:34:08] Thank you, Learned Colleague. I understand that the
23 witness has answered my question. I'm going move on to another subject area.

24 Q. [11:34:15] So, Mr Witness, when we parted company, you were talking to us
25 about the meeting that you had with Mr Blé Goudé. So you briefly broached what

1 you discussed. You met with him. And how did that meeting finish? How did it
2 wind up?

3 A. [11:34:45] Well, subsequent to our meeting, I explained to him the distance
4 between the various roads in my area and that they were not tarmacked either. And
5 I said that he needed to give us help and support. Mr Blé Goudé gave us 16
6 motorbikes, 16 motorbikes, ninja motorbikes; and he gave us the means to have those
7 motorbikes transported from Abidjan to Man, because we needed to have a big lorry.

8 Q. [11:36:01] I just want to be sure about what you just said. Did he give them to
9 you, those 16 motorbikes, or just promised them to you?

10 A. [11:36:10] He gave them to us.

11 Q. [11:36:12] Were they new motorbikes? Were they secondhand?

12 A. [11:36:16] They were new with all their papers, and they were of the ninja make.

13 Q. [11:36:26] And you say that he also gave you the means, a large lorry. What is
14 that large lorry?

15 A. [11:36:39] Well, I don't think -- I don't really know. I think it's a 20 or 30-ton
16 lorry to put those motorbikes in, because we couldn't take those 16 motorbikes in a
17 simple vehicle. We had to put them in transportation lorries, and that's how they
18 were transported.

19 Q. [11:37:04] And what were the motorbikes to be used for specifically?

20 A. [11:37:10] Well, I was with his representative, Guillaume Gogon, that I gave part
21 of them to. The motorbikes were going to be used by all those young people so that
22 they could go into the far-flung areas because, you know, 25 kilometres of
23 non-tarmacked road, and sometimes there are places where a car will only come by
24 once a week. It's very difficult. It's awful. But using those motorbikes, the young
25 leaders could go to those villages to bear the message of the programme of President

1 Gbagbo, the candidate. And the motorbikes were a more rapid and more secure
2 means of transport. You know, this is a mountainous area, and there are locations
3 that even the four-by-four cannot access, and the motorbikes could take over that
4 duty.

5 Q. [11:38:11] For us to understand correctly, was it up to you to keep hold of those
6 motorbikes subsequently?

7 A. [11:38:21] Well, it goes without saying that for all those leaders that we gave
8 them to, it was a stimulating activity because they knew that once they had
9 accomplished their mission well, they could hold on to the motorbike.

10 Q. [11:38:40] Was any money handed over to you?

11 A. [11:38:43] Yes. He gave us some money for costs, for expenses.

12 Q. [11:38:47] For this to be clear on the record, who gave you the money?

13 A. [11:38:57] Well, it was Charles Blé Goudé who handed the money over.

14 Q. [11:39:06] And in terms of sums of money, what did he give you?

15 A. [11:39:10] Well, if my memory serves me correctly, I believe there was a sum of
16 500,000 handed over.

17 Q. [11:39:17] And you wrapped up this meeting with Mr Blé Goudé in which way?
18 Well, what did you agree upon?

19 A. [11:39:37] Well, we agreed upon the fact that the work was to be done and that
20 then we would come back and report to him with regard to the concerns voiced as to
21 what was going on out on the ground because he himself subsequently needed to
22 manage somehow, so we needed to report to him on the mission that was entrusted to
23 us.

24 Q. [11:40:01] And the mission, in brief, what was it about?

25 A. [11:40:05] Firstly, we needed to go and speak to our relatives. We needed to

1 adhere to the programme of President Laurent Gbagbo. And secondly, we needed
2 to have a census taken, because you know that in the west of the country a lot of our
3 relatives are not part of the census. They do not have identity cards. And we
4 needed to explain to them the necessity of following candidate Laurent Gbagbo. But
5 we also needed to encourage them and facilitate the paper obtention methods so that
6 they could get a voter's card and thereby express their support for Laurent Gbagbo,
7 the president.

8 Q. [11:40:55] And you personally, what was your position or function in that
9 mission?

10 A. [11:41:12] Well, first and foremost, to coordinate, to hand over the motorbikes to
11 those who really had been recognised out on the ground as being in a position to do
12 the job and coordinate the work and report back, handing over that report to Charles
13 Blé Goudé.

14 Q. [11:41:33] Did you go alone to said location when you went to meet with
15 Mr Blé Goudé or were you in the company of somebody?

16 A. [11:41:52] Well, I was with Gogon Guillaume, the young brother who is the
17 representative from Danané.

18 Q. [11:42:00] So you went back. What did you do subsequently when you
19 received the money, the motorbikes, the lorry?

20 A. [11:42:17] We rented a lorry, and we went into the west of the country, and I
21 handed over the motorbikes to Gogon Guillaume to take care of the zone
22 Zouan-Hounien, Danané region and with regard to Facobly, the other area, the area
23 that was also within my remit. I organised a ceremony for all the young people so
24 there would be more clarity. And we handed over to those people the motorbikes
25 that we thought -- to those people we thought were apt to fulfil the mission.

1 Q. [11:42:59] So if I understand correctly, it was essentially a mission in the west, in
2 your region?

3 A. [11:43:14] Yes, in Tonkpi, Tonkpi.

4 Q. [11:43:18] Could you tell us in brief how this mission was part of Mr Gbagbo's
5 election campaign?

6 MR GBOUGNON: [11:43:31] (Interpretation) Mr President.

7 PRESIDING JUDGE TARFUSSER: [11:43:33] Maître Gbougnon.

8 MR GBOUGNON: [11:43:36] (Interpretation) Mr President, I do understand that
9 we want to cover ground rapidly, but we need to use the words used by the witness.
10 On a number of occasions now, the Prosecution is trying to cover ground rapidly and
11 put words in the witness's mouth.

12 That's why I'm rising to my feet to object, because the witness didn't talk about
13 election campaign, nor did he situate the period during which it occurred, nor did he
14 mention an election campaign.

15 PRESIDING JUDGE TARFUSSER: [11:44:04] Well, I'm still in 2008, I must say, and
16 we are quite far away, if this is correct, from the election campaign. So probably I
17 think we should from time to time go to focus on also that, in order to make this
18 record more easily to be read in the future, so this is what I ask the Prosecutor to do.
19 Thank you.

20 MR GARCIA: [11:44:37] Thank you, your Honour.

21 Q. [11:44:40] (Interpretation) Now, Mr Witness, for us to be able to situate
22 ourselves in time -- I'm going to be doing my very best for us to situate ourselves. I
23 did refresh your memory a bit earlier on. We revisited your transcript and you
24 talked about 2008, beginning of 2009. But could you tell us at what date you went to
25 meet Mr Blé Goudé? And I'm going to provide you with a reference point, all right?

1 Do you remember that in Yopougon's complex, sports complex -- and for my Defence
2 colleagues, I'm talking about CIV-OTP-0025-0669, to be found at tab 33 in the list of
3 evidence that the Prosecution intends to use.

4 Now, Mr Witness, were you aware that on 31 October 2009 at the sports complex in
5 Yopougon, there was an event, and Mr Alpha Blondi, from what I can understand,
6 was invited as an artist, and this was an event that showed the recognition --

7 MR GBOUGNON: [11:46:13] (Interpretation) Mr President.

8 PRESIDING JUDGE TARFUSSER: [11:46:15] Maître Gbougnon.

9 MR GARCIA: Mr. President, the witness is present.

10 MR GBOUGNON: [11:46:22] (Interpretation) Yes, I do know the witness is present.

11 Mr President, there is a procedure, a given procedure here. There is a document
12 here that is not signed by the witness. He is not the recipient either. Now, the
13 foundation question would be to ask him whether he has already seen the document
14 or not. We cannot just, sir, refresh his memory like this. We should need to ask
15 him whether he has already seen the document before.

16 MR GARCIA: [11:46:46] Your Honours, just so that the record is clear, what I'm
17 doing is I'm making note and identifying the document from which I'm taking the
18 information to try and position in a time frame the witness. That's all I'm doing here.
19 This is the limited exercise. So maybe, maybe counsel, Defence counsel --

20 PRESIDING JUDGE TARFUSSER: [11:47:05] Yes, please proceed, Mr Prosecutor.

21 MR GARCIA: [11:47:07] -- maybe misunderstood me.

22 PRESIDING JUDGE TARFUSSER: [11:47:09] It's not a matter about authenticating
23 this document. It's a matter of helping the witness in setting his -- from a locational
24 and timely position. Okay. Thank you. Please go ahead.

25 MR GARCIA: [11:47:27] (Interpretation)

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1 Q. [11:47:28] Now, Mr Witness, I'm just going to resume. On 31 October 2009,
2 there was an event at the Yopougon sports complex concerning Mr Blé Goudé to
3 show the recognition and support for Mr Blé Goudé. And there was also the issue of
4 underscoring his election as the director of the campaign president for the Ivorian
5 youth. Does that remind you of anything at all?

6 A. [11:48:03] I don't know what you are getting at. I do not understand.

7 PRESIDING JUDGE TARFUSSER: [11:48:07] Excuse me. Let me put the question
8 more simply. Do you know anything about this event which is on 21 September
9 2009?

10 MR GARCIA: [11:48:21] Your Honour, that's the date of the --

11 PRESIDING JUDGE TARFUSSER: [11:48:24] No, on the 3rd -- on 31 October 2009 in
12 the Complexe Sportif du Yopougon, do you know anything about this event on that
13 day?

14 THE WITNESS: [11:48:37] (Interpretation) Mr President, I --

15 PRESIDING JUDGE TARFUSSER: [11:48:44] Maybe you don't have the translation.
16 Oui?

17 THE WITNESS: [11:48:50] (Interpretation) Yes, yes, I'm on the English channel.

18 PRESIDING JUDGE TARFUSSER: [11:48:54] Well, that's a problem. You should be
19 on the French channel.

20 THE WITNESS: [11:48:58] Oui.

21 PRESIDING JUDGE TARFUSSER: [11:49:00] Please read this document which is on
22 your screen.

23 MR GARCIA: [11:49:36] (Interpretation) Could we please change page?

24 THE WITNESS: [11:49:39] (Interpretation) Yes, Mr President.

25 PRESIDING JUDGE TARFUSSER: [11:49:43] Yes what? Do you know anything

1 about this event which took place, according to this document, on 31 October 2009 at
2 the Complexe Sportif in Yopougon?

3 THE WITNESS: [11:50:07] (Interpretation) Yes, yes, I did hear speak of the event.

4 PRESIDING JUDGE TARFUSSER: [11:50:14] Okay.

5 MR GARCIA: [11:50:15] (Interpretation) Thank you, Mr President.

6 Q. [11:50:17] Now, Mr Witness, the reason why we broached this issue and this
7 event is because we wanted to situate you in time. When you went to see Mr
8 Charles Blé Goudé, was it before or after said event?

9 A. [11:50:44] I can't tell you specifically, I cannot tell you specifically, but no, you
10 know, it's such a long time ago now, I can't tell you exactly.

11 Q. [11:51:04] Well, I'm going to put the question to you in another manner,
12 Mr Witness. When you went or when you received the call from Mr Charles Blé
13 Goudé and you went to see him, was Mr Blé Goudé already the national director of
14 the associated campaign for the mobilisation of the youth, or did that happen
15 subsequently?

16 A. [11:51:29] He was not already in that position.

17 Q. [11:51:34] So do you know how long after that meeting Mr Blé Goudé did
18 indeed, or took up that position or was appointed to that post, how many months,
19 how many weeks?

20 A. [11:51:53] Respectfully, I do not recall. I can't tell you specifically. But my
21 meeting, at the time of my meeting with him, he was not yet national director of the
22 campaign.

23 Q. [11:52:09] So you are not in a position to tell us whether it was around that date
24 or not?

25 PRESIDING JUDGE TARFUSSER: [11:52:17] No. No, he's not. No, he is not.

1 MR GARCIA: [11:52:20] Thank you, your Honour.

2 Q. [11:52:54] Now, Mr Witness, we parted company when you talked about the fact
3 that you had gone off on mission. What happened subsequently? Did you go back
4 to that location, or what happened? I also remember that you testified to the effect
5 that you handed over the motorbikes. What happened after that?

6 A. [11:53:11] Well, after that I returned and I told my younger brother Gogon
7 Guillaume that it was high time to go and meet his chief and report back to him on
8 the mission that had been assigned to us. And he said, "All right. No problem."
9 So he called me one day to say that we had an appointment and that I could go by to
10 see Mr Blé Goudé, Mr Charles Blé Goudé, and that is how I came to go and see Mr
11 Charles Blé Goudé. On that occasion it was in Yopougon, in Yopougon.

12 Q. [11:54:19] And are you in a position to tell us how long after that first meeting
13 with him you went subsequently to see him in Yopougon?

14 A. [11:54:28] Well, it was as soon as we went on mission. I think it took a while.
15 It was about a month, a month and a half later. We came back and then I said to
16 Gogon, "Listen, we went on mission. You need to go and see your chief. You need
17 to take an appointment with, make an appointment with him so that I can go and
18 report back to him on the mission," and Gogon said, "No problem." And then one
19 day he called me to say, "You have an appointment at my chief's place. We need to
20 meet there to report back." And we went to Yopougon on that occasion, in
21 Yopougon.

22 Q. [11:55:27] Before we continue on that subject, Mr Witness, did Mr Blé Goudé go
23 at any given moment in time to your region, to the region of the west to meet with
24 you?

25 A. [11:55:41] Could you please rephrase your question? I didn't quite grasp it.

1 Q. [11:55:50] Did Mr Charles Blé Goudé go to the west of the country?

2 A. [11:55:57] Yes.

3 Q. [11:56:01] For us to understand each other well, when he went to the west of the
4 country, was it before you went back to Yopougon or was it after that?

5 A. [11:56:11] It was afterwards.

6 Q. [11:56:15] So let us continue with your visit to Yopougon. What happened and
7 where did you go exactly?

8 A. [11:56:24] In Yopougon, at the Millionaire, in the Millionaire neighbourhood of
9 Yopougon, that is where Mr Gogon told me, and we went there, we arrived. We
10 found Gohi Bernadette, Mr Koué, who said to us that Charles had not yet arrived,
11 Charles Blé Goudé was not yet there, and that we needed to wait outside.

12 Q. [11:57:13] And the location that you went specifically to in Yopougon, where
13 was that that you had, the location where you had an appointment with Charles Blé
14 Goudé?

15 A. [11:57:29] Well, it was a villa. It was the first time that I'd ever been there at the
16 Millionaire, and it was a villa. And when we arrived, we were told to wait outside,
17 because Mr Charles Blé Goudé had not arrived. We needed to wait outside. And I
18 said, "Well, listen, Gogon told me that we had an appointment. I can't be, as a
19 person in a position of responsibility, wait outside." And they said, "No. You need
20 to wait outside."

21 So I left. I said, "Sorry," to Gogon, "but Charles is not my boss. He's a brother. He
22 called me. I came. I'm not allowed to sit down and I'm told to leave outside. I'm
23 going home. You can report back to your boss." And I left.

24 Q. [11:58:26] So did you subsequently see Mr Charles Blé Goudé? And I have
25 been told that you need to wait a few seconds, 5 seconds before answering my

1 question. Did you see Mr Charles Blé Goudé subsequently again?

2 A. [11:58:56] Yes, in Man.

3 Q. [11:59:03] Just a question before we continue, Mr Witness. You say that you
4 went to the Millionaire neighbourhood, that you were at a villa outside. To your
5 knowledge, was that Mr Charles Blé Goudé's residence, according to your knowledge
6 then and now?

7 A. [11:59:42] I believe so.

8 Q. [11:59:50] When you say, "I believe so," what do you mean by that? Take your
9 time. We need to interpret you. Take 5 seconds before you answer, please.

10 A. [12:00:09] As a witness, Guillaume told me we were going to meet my chief or
11 his chief at the Millionaire the first time. The first time I met him was in an office.
12 So when he told me we are going to my chief's place at the Millionaire, to my mind I
13 saw a villa, which must have been a residence. To my mind it was a residence.

14 Q. [12:00:47] When you went back to Man, you said that you saw Mr Charles Blé
15 Goudé in Man. In what circumstances did that happen?

16 A. [12:00:56] He came to Man and all the youth were mobilised for a rally or
17 meeting in Man. And he spoke at that rally. He talked about the benefits of
18 President Laurent Gbagbo's government.
19 And then thereafter on his way back, he stopped in my village. He stopped over in
20 my village, which is some 16 kilometres from Man, on the Logoualé Man highway,
21 which is tarred. He stopped in my village. We received him and he was there for a
22 while and then he left with his delegation.

23 Q. [12:02:06] Who was part of his delegation?

24 A. [12:02:10] I do recall that it was made up of Mr Koué, Ms Gohi, and there were
25 some other youths, as well as his bodyguards.

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1 Q. [12:02:31] Sorry, I didn't understand what you said.

2 A. [12:02:36] His bodyguards. Then there were other youth, young leaders whom
3 I didn't know personally. But it was a strong delegation, including representatives
4 of COJEP and Tonkpi.

5 Q. [12:02:59] When you say his bodyguards, how many people made up his
6 bodyguard?

7 A. [12:03:09] I can't tell you because there were a number of people around Charles
8 Blé Goudé. But I could see that his guards could be identified by their conduct and
9 their stature, the way they were built, well built, two or three of them.

10 Q. [12:03:33] According to what you saw, how did you know they were his guards?

11 A. [12:03:48] I saw people in civilian attire, but very well built, quite stout, and who
12 could be easily identified as such.

13 PRESIDING JUDGE TARFUSSER: [12:04:00] Are we still talking about 2009, the
14 question?

15 MR MACDONALD: [12:04:07] With your permission, your Honour, I'll just
16 intervene on that topic. And I think it would be an appropriate time for the witness
17 to just go out of the courtroom for two minutes to explain that, because I see that the
18 Chamber obviously has recurring questions as to why we're on that time frame.

19 PRESIDING JUDGE TARFUSSER: [12:04:31] No. I just try always to follow up also
20 the time frame.

21 MR MACDONALD: [12:04:35] All right.

22 PRESIDING JUDGE TARFUSSER: [12:04:36] Otherwise, we get lost.

23 MR MACDONALD: [12:04:37] Yes, yes, your Honour. Okay.

24 PRESIDING JUDGE TARFUSSER: [12:04:41] It's not a matter of -- I just want to
25 situate us. We are always talking about what happened, but we never know really

1 when this happened. So sometimes if we could focus on the time frame it would be
2 helpful.

3 MR GARCIA: [12:04:59] Your Honour, my understanding is that from refreshing his
4 memory, it was the start of 2009, and we've been progressing through time since then.
5 The witness is unable, despite attempts situating him, to give us a precise date, but
6 we're advancing through time in 2009, and I imagine at one point we'll get to 2010,
7 but I'll have another question for him in that regard and see if we can situate him
8 then.

9 PRESIDING JUDGE TARFUSSER: [12:05:23] Okay. Please.

10 MR GARCIA: [12:05:26] (Interpretation)

11 Q. [12:05:27] So you said Mr Blé Goudé came. You received him in your village.
12 What was his message when he came to your village? What did he have to say?

13 A. [12:06:02] It was a message on President Laurent Gbagbo's programme, a
14 message of peace. He came to say that President Laurent Gbagbo had great
15 ambitions for our area, for Côte d'Ivoire, but specifically for our area; and that
16 President Laurent Gbagbo loves our region because he had friends and brothers in
17 that region which he considered to be very beautiful and to deserve maximum
18 development so that it can attract tourism and put Côte d'Ivoire at the same level as
19 other countries. So it was a message of development, a message of actions, the
20 actions of President Laurent Gbagbo.

21 Q. [12:07:09] Now, once again, if it is possible, can you locate us, can you situate us
22 in time. At the time Mr Blé Goudé came to your village, as you say, was he already
23 the deputy national campaign director in charge of mobilising the youth?

24 A. [12:07:33] No.

25 Q. [12:07:36] I want to understand clearly in my head what you are saying. The

1 election campaign, according to information we have, started on 5 August 2010.

2 Now, had it already started at that time, yes or no?

3 A. [12:08:02] No. The campaign had not yet started. It started at the date which
4 you mentioned.

5 Q. [12:08:10] Now, let us proceed, Mr Witness. When Mr Blé Goudé came to your
6 village, what happened thereafter?

7 A. [12:08:17] He was warmly received as a brother.

8 Q. [12:08:28] Let me be more specific. After he left your village, did you see him
9 again?

10 A. [12:08:32] I saw him again when it became time for the youth representative on
11 President Laurent Gbagbo's campaign team at the COJEP at Toits rouges.

12 Q. [12:09:04] How much time after he came to your village did that happen? How
13 much time thereafter, approximately?

14 A. [12:09:14] That happened after he had been appointed campaign director and
15 the time had come for him to choose his representatives in the various regions in
16 order to decentralise the campaign activities of President Laurent Gbagbo.

17 Q. [12:09:42] So if I understand you, that was after 31 October 2009; is that correct?
18 Well, you said you went to see him at Toits rouges, if I understand properly. How
19 did it all happen? By the way, who invited you to go meet him?

20 A. [12:10:06] Thank you. Charles Blé Goudé, through his office, had called on all
21 leaders region by region, and I was the president of COMAJMG, and I was informed
22 that President Charles Blé Goudé was receiving all the youth in Tonkpi with a view to
23 selecting the youth representatives on Mr Laurent Gbagbo -- on President
24 Laurent Gbagbo's campaign team.

25 So we went to Toits rouges at the COJEP office. All the young leaders were present

1 in attendance.

2 Q. [12:11:01] When you say "all youth leaders" -- please remember the five-second
3 rule -- which regions are you referring to? Which youth leaders are you referring to?

4 A. [12:11:16] Youth leaders from Tonkpi, obviously.

5 Q. [12:11:31] Please proceed. When you got to the location, what happened?

6 A. [12:11:36] We were installed in the courtyard of the COJEP offices, and then one
7 of his representatives came since Charles was not yet around. So the representative
8 came to inform us that President Laurent Gbagbo was looking for youth leaders for
9 his national campaign and that he had received other regions and that it was our turn
10 on that day, during which we were expected to provide a representative of the youth
11 who would then work in harmony with the president, and that such a youth would
12 be selected either by consensus or by a democratic process.

13 Then, quite obviously, my youth who had bestowed their confidence in me told me,
14 "Well, president, you must be the candidate." And I said, "Well, if that is your wish,
15 I will say yes."

16 But then there was also a brother, an elder brother, Pastor Gami, who also stood as a
17 candidate.

18 Q. [12:13:11] Can you tell us something briefly about who Pastor Gami was?

19 A. [12:13:20] Pastor Gami, I was seeing him there for the first time. He is also
20 from Tonkpi, and we are all from the same region. I had heard mention of his name.
21 I don't know whether he was leading up a militia. Well, his junior brother, whose
22 name was Bi Bo, used to work with me and Franck Guéï. That was the first time that
23 I was meeting or seeing Gami.

24 Q. [12:13:53] That's fine. I understand that you were seeing him for the first time
25 and you mentioned what you had heard about him previously. And you said that

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1 he may have had a militia?

2 THE INTERPRETER: [12:14:09] Overlapping speakers.

3 PRESIDING JUDGE TARFUSSER: [12:14:11] Please do not overlap, otherwise we
4 don't get what you are saying.

5 MR GARCIA: [12:14:19] (Interpretation)

6 Q. [12:14:23] Mr Witness, one moment, please. I am trying to -- I'm waiting for
7 your answer to be displayed.

8 MR ZOKOU: [12:14:45] (Interpretation) I am sorry to interrupt you, but simply I
9 want to clarify a point. You said that the witness said in referring to the individual
10 that he was the leader of a militia. Can you give us the specific reference to that
11 assertion that you made, Counsel?

12 MR GARCIA: [12:15:06] (Interpretation) As far as I can recall, I don't remember
13 saying he was a militia leader. I simply said that he had a militia, and the witness's
14 answer is at line 28, page 49, which the interpreters did not get because there were
15 overlapping speakers.

16 Mr President, can I proceed?

17 MR ZOKOU: [12:15:33] (Interpretation) No. Previously the witness had not
18 mentioned that, but you spoke to a previous statement of the --

19 THE INTERPRETER: [12:15:41] Overlapping speakers, Mr President.

20 PRESIDING JUDGE TARFUSSER: [12:15:45] We are always overlapping. Now put
21 the question again from scratch and then we'll see what happens.

22 MR GARCIA: [12:16:04] (Interpretation)

23 Q. [12:16:05] Mr Witness, I'm referring to page 49, line 28. When talking about
24 Pastor Gami, you said, yes, he had a liberation movement, I don't know what, from
25 the west.

1 Now, that that M-I-L-O -- does the M-I-L-O-C-I movement ring a bell, Mouvement
2 ivoirien de libération de la Côte d'Ivoire; does that ring a bell, Mr Witness?

3 A. [12:16:45] Yes, through the media.

4 Q. [12:16:46] Is that the movement you are referring to in your answer?

5 A. [12:16:57] Once again, let me repeat that Pastor Gami had a movement, but I
6 don't know what the movement was. However, I knew his junior brother who used
7 to work with me. I don't know. During the crisis, and one could see it on TV, there
8 were so many names, MJP and so on and so forth, so I don't know.

9 Q. [12:17:21] Was this a movement from the west?

10 A. [12:17:23] Yes.

11 Q. [12:17:26] You also mentioned a militia. What type of movement would it have
12 been, as far as you know?

13 A. [12:17:49] I don't know. I was not in Côte d'Ivoire. I don't know. What I'm
14 saying is that Pastor Gami was from the same region as myself. His younger brother,
15 same father, same mother, used to work with us, and that's how I came to hear his
16 name.

17 But I saw him for the first time at the COJEP office in Yopougon, and he stood as a
18 candidate against me. That's it.

19 Q. [12:18:31] The name Pastor Gami has been used, but do you know his real name?
20 Does the name Diomandé Abdoulaye ring a bell in that connection?

21 A. [12:18:51] No.

22 MR GBOUGNON: [12:18:51] (Interpretation) Mr President.

23 PRESIDING JUDGE TARFUSSER: [12:18:54] Maître Gbougnon.

24 MR GBOUGNON: [12:18:57] (Interpretation) I have to rise again to my feet
25 because of the manner in which the Prosecution is proceeding. This is not acceptable.

1 You can put a question and wait for an answer rather than propose a name to the
2 witness without laying any foundation. I don't think that is proper.

3 If we want things to be done properly and to avoid our objections, then please let us
4 go by the rules.

5 MR GARCIA: [12:19:33] Your Honour, I was simply trying or attempting to refresh
6 the witness's memory on the group. The witness had given part of the answer, and I
7 was determining whether this group was indeed the one. The witness can reply yes
8 or no, and he has replied.

9 PRESIDING JUDGE TARFUSSER: [12:19:44] Well, I don't know how it was in
10 French, but what I don't like is when you say "this is not acceptable." If you want to
11 do things, to be done by the rules. I don't think we are out of that, that's why you
12 can stand up and say what you have to say. So it seems from this at least how it
13 sounds in English that here everything is done against the rules and improperly and
14 unacceptably.

15 So this said, I ask the Prosecutor just to put questions, brief, and to elicit the answers.
16 Please go ahead, Mr Prosecutor.

17 MR GARCIA: [12:20:34] (Interpretation)

18 Q. [12:20:35] Mr Witness, you say that there was a Pastor Gami who was also
19 running for that position. Can you tell us whether you had to speak? Did Pastor
20 Gami have to talk about his positions? How did things happen?

21 A. [12:21:51] Yes, we were all given some time to speak to convince the youth of
22 Tonkpi. I delivered my speech. I made my arguments. I introduced myself and I
23 said that I was familiar with our traditions and customs and that I had been with
24 Franck Guéï, the son of late General Guéï, and I had the opportunity to know the
25 entire region, and that I had had the benefit of the support of all the youth who had

1 elected me to the head of COMAJMG, and that I had subsequently been called by
2 Charles Blé Goudé, who had entrusted a mission to me and given me the motorcycles
3 which I handed over to the youth.

4 So I told him that all of those things put together should be enough to make me the
5 man who could facilitate the process of enabling our youth to vote for President
6 Laurent Gbagbo.

7 Then I went on to say that in the Tonkpi region, there are Wé, and then you have the
8 Guéré and then you have the Wobé who are all in that area. And then I also said
9 that I was able to speak their language and that for all these reasons it was possible
10 for us to work together and that I would be the right person to conduct that campaign
11 from start to finish.

12 Q. [12:23:30] You say that you know the younger brother of Pastor Gami. What
13 was his position? What was his view? What was his vision? Was it peaceful?
14 How was it?

15 A. [12:23:45] Bi Bo, Bi Bo was an extraordinary young man who was introduced to
16 me by Dr Franck Guéï, who was a pacifist, and I think that he also received a
17 motorbike from me. He was one of those who accompanied us on all the missions
18 which we conducted. And he talked about what the president wanted to do in the
19 area of health in the Tonkpi region because he was pointing the way out for us.

20 Q. [12:24:18] What was Pastor Gami's speech or position?

21 A. [12:24:27] Well, he said he was Pastor Gami and that people knew him, and that
22 some had just arrived, and that he had been there for a long time, and so he asked the
23 people to put their trust in him, and that is it.

24 Q. [12:24:43] You talked about the liberation of the west. Was that part of his
25 goals? Was that part of the goals of his movement?

1 A. [12:24:55] No. I have simply recalled a few snippets of what I heard. He said
2 that he had been there for a very long time and that some people had just arrived on
3 the scene, that I had just arrived there most recently, and then he said that he was the
4 better candidate and that he was very familiar with the west. That's what I can
5 remember of his speech, his campaign speech.

6 Q. [12:25:34] Let me put the question back to you again very simply. You talked
7 about the liberation of the west a short while ago when you were talking about Pastor
8 Gami?

9 A. [12:25:45] Yes.

10 Q. [12:25:46] What did you hear in that connection, that is in connection to the
11 liberation of the west, what did you hear?

12 PRESIDING JUDGE TARFUSSER: [12:25:55] From whom? What did you know?
13 What did you --

14 MR GARCIA: [12:26:00] (Interpretation)

15 Q. [12:26:01] Mr Witness, if I understand you correctly, the liberation of the west
16 was part of Pastor Gami's policy; is that correct?

17 A. [12:26:11] No, I don't know, because Pastor Gami and us, we came to select the
18 campaign director from the west. And we had to convince the youth about the skills
19 that we would bring to the position. So I'm sorry, but what I heard was that he said I
20 was just a new kid on the block, and that he was an elder who was there, and that it
21 was too easy for the position to be given to me, whereas he was there and that he was
22 familiar with the west.

23 That's what I can remember. Now, if it comes to the liberation of the west, I don't
24 know whether that was part of his campaign programme.

25 Q. [12:26:50] Let me jog your memory by referring to the transcript, 0062-0512,

1 transcript in tab 2, and I'm referring to page 0062-063 -- 0531 at line 675 to 677, and I
2 quote you: "There was another candidate whose name was Pastor Gami, who is in
3 exile, Pastor Gami, who is a pastor who had a GPP something military" --

4 MR GARCIA: [12:28:59] Your Honours, it's a bit difficult to concentrate when
5 Defence counsel -- I mean, there are rules of etiquette in the courtroom. There is a
6 witness present as well.

7 PRESIDING JUDGE TARFUSSER: [12:29:09] Yes, yes, I know. But there was
8 something upstairs in the booth. It's not about you. It's about a reaction in the
9 booth, because you started to read probably --

10 MR GARCIA: [12:29:18] No, I did realise it wasn't about me, but I have noticed that
11 a couple of times that there is laughter on the other side.

12 PRESIDING JUDGE TARFUSSER: No.

13 MR GARCIA: I just wanted to bring it --

14 PRESIDING JUDGE TARFUSSER: [12:29:26] No. In this case there was only a
15 reaction by the booth, which obviously you couldn't see because it's behind you, and
16 which made them laugh. Well --

17 MR GARCIA: [12:29:38] I can repeat, your Honour.

18 PRESIDING JUDGE TARFUSSER: [12:29:40] Please continue and read slowly.

19 MR GARCIA: [12:29:42] (Interpretation)

20 Q. [12:29:43] Mr Witness. Let me reread: "There was another candidate called
21 Pastor Gami, who is in exile. Pastor Gami is a pastor who had something GPP,
22 something, a military something, Pastor Gami." Does that jog your memory?

23 A. [12:30:09] Yes. I said Pastor Gami. Well, yes, Pastor Gami was in exile with
24 us in Ghana. And if you see, sir, he had something. You see, I said he had
25 something. I didn't know him, and I couldn't say exactly what it was. All I know is

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1 that he was called Pastor Gami. He had -- he had something, a liberation something.
2 And I really -- he claimed that he was running something for the liberation of the west,
3 whether it was GPP or MP something, something that was in the media. That's what
4 I said. I saw him. I met -- I saw him in exile in Ghana.

5 Q. [12:31:04] So you confirm that it's a military thing as you said to the
6 investigators?

7 PRESIDING JUDGE TARFUSSER: [12:31:21] Maître Altit, yes.

8 MR ALTIT: [12:31:23] (Interpretation) I suppose, Mr President, that you were
9 going to react, like me, because to our mind it is not a question. I'm objecting.
10 "Was it a military thing?" It doesn't mean anything.

11 PRESIDING JUDGE TARFUSSER: [12:31:34] No, military thing doesn't mean
12 anything. But I think he has replied or has taken a position to what was read to him
13 out from the statement. Therefore, please continue with the question -- no. We
14 don't continue. We stop here, because as I said we have to -- Maître Zokou, no.

15 MR ZOKOU: [12:32:01] (Interpretation) Yes, Mr President. In complement to
16 what Maître Altit just said, the question that was initially put to the witness had a
17 bearing upon the statement of Mr Gami on the occasion of that appointment of a
18 representative. So we can't go from that question and then talk about something
19 more general with regard to a military thingamabob as you said.

20 PRESIDING JUDGE TARFUSSER: [12:32:32] As you might have already heard, I
21 already said what I had to say on this matter.

22 Now we have to break. We come back at 3 o'clock for a normal, from the time point
23 of view on a normal session.

24 Thank you very much. The hearing is adjourned to 3 o'clock.

25 THE COURT USHER: [12:32:57] All rise.

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(Open Session)

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- 1 (Recess taken at 12.33 p.m.)
- 2 (Upon resuming in open session at 3.06 p.m.)
- 3 THE COURT USHER: [15:06:28] All rise.
- 4 Please be seated.
- 5 PRESIDING JUDGE TARFUSSER: [15:06:46] Good afternoon.
- 6 Good afternoon, Mr Witness.
- 7 THE WITNESS: [15:06:56] (Interpretation) Good afternoon, Mr President.
- 8 PRESIDING JUDGE TARFUSSER: [15:07:00] I give immediately the floor back to the
- 9 Office of the Prosecutor for his questioning. Mr Garcia, yours the floor.
- 10 MR GARCIA: [15:07:13] Thank you, your Honour.
- 11 Q. [15:07:16] (Interpretation) Good afternoon, Mr Witness. Just before we took
- 12 the break, you were talking to us about your trip to Yopougon where there was need
- 13 to find a representative where a certain Pastor Gami was a candidate. What
- 14 happened ultimately?
- 15 A. [15:07:58] Ultimately there was a democratic election during which the youth
- 16 elected me.
- 17 Q. [15:08:08] Just to be clear on that point, I think you already mentioned it, but the
- 18 people, the youth you are talking about, were those only the youth from the west,
- 19 from your region, or were there other youth participating in that election?
- 20 A. [15:08:28] From the Tonkpi region.
- 21 Q. [15:08:33] Who was elected?
- 22 A. [15:08:38] Myself.
- 23 Q. [15:08:52] To help us understand the situation better, when you were elected as
- 24 the representative, what would that involve? What were your duties as the
- 25 representative?

1 A. [15:09:09] Well, when one is selected to take charge of the youth in Tonkpi area,
2 it means that this person would be the one managing the youth in relation to
3 President Gbagbo's campaign, and he would work in agreement with the national
4 campaign manager, Mr Charles Blé Goudé as the case was then.

5 Q. [15:09:50] Those who elected you on that day, was their desire respected or their
6 will, was it respected?

7 A. [15:10:08] No.

8 Q. [15:10:14] Explain to the Court why.

9 A. [15:10:22] Well, after I was elected by the youth of Tonkpi, 20 to 30 minutes
10 thereafter, and before Charles arrived, since he was not there when all that was taking
11 place, Mr Koué Jean-Claude, his representative, arrived with some of his friends of
12 the COJEP bureau. But I knew -- whom I didn't know. But I knew Koué very well.
13 So I saw him, and he came to tell me that he had come to announce that Mr Yaké, it's
14 true, that he has won the elections. But he said, and these are his words, I didn't
15 hear his chief say it himself, but that his chief had decided to appoint his supervisor
16 over and above Mr Yaké Évariste.
17 Well, that is what happened, and it immediately led to anger and disapproval from
18 the youth. They said: We already have a campaign director. How is it that you
19 are now introducing a supervisor in our region? Who was, by the way, a dean in our
20 region and whose name was Blé Maurice. He's also one of our in-laws and was not a
21 young person, he was an elder.
22 For that reason, the youth wanted to demonstrate their anger. But I said no. I told
23 them no. I said, well, let's wait for Charles. And that in any event does not change
24 my intrinsic value. So let us wait for him and tell him directly when we see him
25 rather than continue to complain here.

1 Q. [15:12:43] Mr Blé Maurice, before we proceed, did he belong to any particular
2 political party?

3 A. [15:12:57] He was a transporter and a transit agent, and he had created a
4 movement in our area known as GNKB.

5 Q. [15:13:16] What does that stand for?

6 A. [15:13:29] GNKB means in our mother tongue, not in French, en langue Yacouba,
7 ou dan means "Gbagbo nouwai koua ba," meaning: Gbagbo, thank you for all that
8 you are doing for us. GNKB in the Yacouba language means "Gbagbo nouwai koua
9 ba" meaning: Gbagbo, thank you for all what you are doing for us.

10 Q. [15:14:03] What was the goal or the mission of that GNKB?

11 A. [15:14:16] The GNKB, like COMAJMG and JUDDDEM, they had as its purpose to
12 promote development activities in support of President Laurent Gbagbo. That is
13 why in our mother tongue we said thank you for all what you have done for us, Mr
14 President. That is what it meant.

15 Q. [15:14:44] Now, that person Blé Maurice who was selected to become the
16 supervisor, now, when you compare his speech with yours, what type of a person
17 would you say he was?

18 A. [15:15:05] First of all, he was not a youth. And I told you that he was my uncle,
19 my in-law. He is the elder brother to my mother and there is a relationship in there.
20 And this happened in 2006.

21 And we would refer to such a person in our African language as a dean, a dean or a
22 senior citizen, someone who is not of our generation.

23 Q. [15:15:43] You said then at some point to wait for Charles to arrive. Did he
24 come, did he show up?

25 A. [15:15:49] Yes. At some point he showed up, and that's when I met him.

1 Q. [15:15:56] When he arrived, what did he tell you?

2 A. [15:15:59] Well, there was a group of people. Then we went to his office. He
3 greeted me and I greeted him. And then he told me: "Okay, congratulations."
4 And there was not just two of us, there was a group of people there. And so he was
5 receiving people at the COJEP. He greeted me and said: "Congratulations," and he
6 said "Get to work."

7 So, well, I was hoping -- I didn't get the time to -- I was -- well, I was hoping to have a
8 one-on-one with him in relation to the campaign, and thinking that I was the one with
9 whom he had to collaborate in the Tonkpi region. Well, he simply greeted me, said
10 "Congratulations" and then said, "I'll see you," and that was it.

11 Q. [15:17:10] In matter of fact, did you subsequently have a supervisor or were you
12 acting individually, so to speak?

13 A. [15:17:30] As a matter of fact, I was not the one who should have been the one in
14 place according to my understanding, because thereafter I did not have any
15 opportunity to attend any meetings or to receive any instructions or anything
16 whatsoever. So I reported to my boss Dr Franck Guéï accordingly, and he told me,
17 "Well, you're already quite busy with me. And I'm going to call Gilbert Bleu-Lainé,
18 the departmental campaign manager," that is the one who was in charge of the entire
19 campaign effort for men, women and youth in Tonkpi, the DDC, the divisional
20 campaign manager, Minister Bleu-Lainé, he said he was going to call him.

21 Q. [15:18:34] Did the supervisor remain in that position thereafter?

22 A. [15:18:40] Yes. He remained in that position because when we went to Man, I
23 did not have -- well, I was an empty vessel, a divisional coordinator only by name.
24 But he remained in place. And when we went to Man, Dr Franck had told me
25 that -- rather, my boss Franck Guéï had found a vehicle for me. The DDC had

1 provided me with some T-shirts bearing President Laurent Gbagbo's pictures. And
2 all of that was part of the campaign effort.

3 So I went to Man. And when I got to Man, I was there in Man, I had just entered the
4 town, and opposite the Leveneur hotel in Man, I almost lost my life to the supporters
5 of my adversary at the time. They burnt my car, and I simply survived thanks to the
6 intervention of some individuals.

7 Q. [15:19:56] Let me return to this issue of the supervisor. After the supervisor
8 remained in position, you, did you continue to enjoy the support of Charles Blé
9 Goudé?

10 A. [15:20:13] No, clearly not.

11 Q. [15:20:20] What was your reaction?

12 A. [15:20:25] My reaction, as I said, I informed my boss. I told the youth who
13 supported me, and I told them that in any event we had only one goal, our goal was
14 to get our champion, President Laurent Gbagbo, to win.

15 So I was ready to work with Dr Franck Guéï, my boss, to obtain all the necessary
16 gadgets and whatever was needed. So there was no need to fight, but, rather, to
17 focus on the goal, because the doctor had always said, my boss had always said that it
18 was important for us to win in our department, or in our division, so that the
19 president can indeed grant our requests for development, for the development of our
20 region.

21 Q. [15:21:36] A question regarding the supervisor, did the supervisor receive any
22 funds for the purpose of running the campaign?

23 A. [15:21:53] Well, when you talk about a campaign, there is a budget. And
24 obviously there are gadgets and all types of items that are used in running a
25 campaign, including vehicles, transportation, posters, rally events, sound systems.

1 It's a whole gamut of items that are used to promote the ideals that are being sold to
2 the population, so to speak, in order to get them to win -- or to vote for our candidate,
3 President Laurent Gbagbo.

4 Q. [15:22:45] Now, if I understand your answer, the supervisor therefore received
5 some funds for running the campaign; is that correct?

6 A. [15:22:51] I was no longer in the network, and I do not know what the logic
7 behind all of that was. I was no longer in the network, but the campaign was going
8 on.

9 Q. [15:23:05] Did you personally receive any funds from Mr Blé Goudé for the
10 campaign after that point in time?

11 A. [15:23:14] After the 16 motorbikes and the 500,000 that was handed over, I did
12 not receive any other money from Mr Charles Blé Goudé.

13 When a supervisor was installed and the youth didn't support him, I went back to
14 join my boss, Dr Franck Guéï, who gave me a vehicle, who gave me the gadgets as I
15 mentioned, which made it possible for me and my youth to work, because our
16 purpose was to get our champion to win, that's it.

17 Q. [15:23:54] Well, let me now -- now, can you tell us, if you know, why it was that
18 Mr Charles Blé Goudé no longer supported you financially, I mean?

19 A. [15:24:16] I don't understand your question.

20 Q. [15:24:21] As far as you know, do you know why Mr Charles Blé Goudé no
21 longer provided you with financial support?

22 A. [15:24:36] Well, because I was probably not his choice, and because there was a
23 supervisor in place, and because I had somewhat withdrawn from them and I had
24 gone back to my starting point, and I was working with my boss, Dr Franck Guéï.
25 Furthermore, I wasn't someone who was given to being easily submissive, because in

1 any event I was his elder, I had had a conflict with Mr Koué, not with Mr Charles, on
2 this very matter. And I clearly reminded him that Charles was my junior brother,
3 and that he was not my boss, but that I was probably his external collaborator,
4 because my boss was Mr Franck Guéi. I reminded them of that.

5 Q. [15:25:43] Can you tell us a little more about this clash that you had with him?

6 A. [15:25:47] I told you already that I had come to see him at home at the
7 Millionaire. And I was asked to wait outside as if I hadn't booked an appointment
8 with him.

9 I told Ms Gohi that I had an appointment not with Mr Charles but and now -- with
10 Mr Charles, rather, and now I've been asked to wait outside and I don't understand
11 that. Give me a seat somewhere at least.

12 Well, Mr Koué didn't appreciate that, and he said, "If that's what you're saying and so
13 on and so forth, I've told you that the boss is not here," and I told him, "The person
14 you're talking about is not my boss. Things have to be very clear.

15 I was sent on a mission and I'm coming back to report. The basic measure of respect
16 that can be extended to me is that I be given at least a seat, not that I be asked to stand
17 out in the open. And I'm expected to wait not knowing at what time your boss will
18 show up." Well, there you have it.

19 Q. [15:26:56] Let us now talk about the election campaign. Much earlier before the
20 break I told you that we had information that it was on 5 August 2010 that the
21 election campaign was launched in Côte d'Ivoire. Now, if I understand well, and
22 please tell me whether this is correct, had you been involved in any of the
23 campaigning before that date?

24 A. [15:27:25] No, no, I wasn't involved in campaigning because, you see, it was
25 after the DNC was appointed and so on and so forth that I ended up going to the west.

1 When the campaign season had opened, opened, rather, it is then that I cheated death.

2 Q. Now, let us talk about the election campaign. Now, what were the financial
3 resources available to you for the purposes of that campaign? Can you tell the
4 Court?

5 A. [15:28:07] Let me repeat myself. When I left and a supervisor was installed, I
6 went to Dr Franck Guéï, my boss, and reported to him accordingly. He himself
7 promptly called the divisional campaign manager, Minister Gilbert Bleu-Lainé, and
8 told him that he should provide me with everything that amounted to gadgets and
9 campaign items.
10 He then, being my boss, gave me a vehicle. He gave me fuel, fuel and resources to
11 enable me go to the DDC and collect a number of gadgets such as T-shirts and posters
12 so that I could then proceed to engage in President Laurent Gbagbo's campaign until
13 he came to meet us.

14 Q. [15:29:23] Was that enough? Was that sufficient?

15 A. [15:29:32] Sufficient, enough? It was, it was okay, because with that, myself
16 and my youth, we were able to move about. We knew the purpose of the campaign.
17 We had the gadgets. We had the T-shirts. Now, for us the money was to be used
18 for fueling the vehicles and so on and so forth. But what mattered the most was
19 what was being said, the speeches. That was more important than the items that
20 were going to be given to the people, to the population.

21 Q. [15:30:12] Did you have any guards with you?

22 A. [15:30:18] No. I went in the car with my elements, and I gave resources to
23 others to take transport. I have told you that I was almost burnt alive. If I had
24 guards, that would not have happened.

25 Q. [15:30:38] How many people travelled with you?

1 A. [15:30:41] There were five of us in the car, the driver, myself and three of us.
2 The others had taken public transport. There were ten of us in the bureau. All our
3 actions were centred in Tonkpi. So the people that we wanted to reach were already
4 in the field. There were only those certain who did not have resources, students and
5 so on, and we had to help those people to go to the field, because through their
6 presence and their charisma, the parents or relatives would understand the necessity
7 of voting for our champion.

8 Q. [15:31:28] And during that election campaign, did you personally have access to
9 President Laurent Gbagbo?

10 A. [15:31:37] No. No.

11 Q. [15:32:06] Comparatively to your resources, can you tell us, Mr Witness, what
12 were the resources of Mr Charles Blé Goudé during that election campaign?

13 A. [15:32:23] Listen, I cannot tell you what is not true. But I know that as the
14 deputy national director of campaign for 322,000 square kilometres, there is no
15 comparison between those resources and the ones for someone in charge of a region
16 only. So I know that he was someone who was a major leader in the campaign.
17 That's all I can say.

18 Q. [15:33:07] Can you tell us an approximation of those financial resources?

19 PRESIDING JUDGE TARFUSSER: [15:33:13] Maître Altit.

20 MR ALTIT: [15:33:17] (Interpretation) Thank you, Mr President. Mr President,
21 I'm objecting here because it would have been more appropriate to ask the witness
22 whether he had any way of knowing what were the resources available not only to
23 Mr Charles Blé Goudé but his staff and so on, how he got to know about it and
24 whether the sources were credible. And all these things have to be known before
25 asking that question. The witness has said about 15 times that he didn't have such

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1 links. He has said that in answer to questions from the Prosecutor, so that question
2 cannot be put directly to him.

3 MR GARCIA: [15:34:07] Your Honour, the questions were the --I'm sorry.

4 MR KNOOPS: [15:34:11] Well, Mr President, we gave the Prosecution quite -- am I
5 on the microphone outside Court?

6 MR GARCIA: [15:34:20] Also depending on what Defence counsel is going to say --

7 PRESIDING JUDGE TARFUSSER: No, no. Come on, come on.

8 MR GARCIA: [15.34.21] -- the witness is present.

9 PRESIDING JUDGE TARFUSSER: [15:34:23] No, no. It's me who gave you the
10 floor.

11 Mr Knoops.

12 MR KNOOPS: [15:34:27] Very briefly, the witness is not an accountant, and the
13 questions are clearly calling for speculation.

14 PRESIDING JUDGE TARFUSSER: [15:34:38] Mr Garcia.

15 MR GARCIA: [15:34:40] Your Honour, I've asked the question. And then
16 obviously I'm directing the questions to the witness, and I am going to get to the
17 foundation of his knowledge during my questioning. Now, the witness has already
18 responded, given a certain answer. I've asked him a more precise question. If the
19 witness is able to answer that question, he'll answer it.

20 PRESIDING JUDGE TARFUSSER: [15:35:05] Do you know anything about the
21 resources Mr Blé Goudé had for the election campaign?

22 THE WITNESS: [15:35:19] (Interpretation) No.

23 PRESIDING JUDGE TARFUSSER: [15:35:24] Mr Garcia.

24 MR MACDONALD: [15:35:54] Your Honour.

25 PRESIDING JUDGE TARFUSSER: [15:35:55] Excuse me, Mr Witness. When you

1 say I know -- I'm reading now the transcript at page 70, line 5, from then on. To a
2 question by the Prosecutor, you said, "Listen, I cannot tell you what is not true, but if I
3 know that as a deputy -- as the deputy national director of campaign for 322,000
4 square kilometres, there is no comparison between those resources and the ones for
5 someone in charge of a region only. So I know that he was someone who was a
6 major leader in the campaign. That's all I can say."

7 But what do you want -- can you explain this, which I didn't understand. When you
8 make this comparison between a deputy national director of a campaign for 322,000
9 kilometres and you compare it with those of one, for someone in a region only, what
10 do you mean by this?

11 THE WITNESS: [15:37:20] (Interpretation) Mr President, what I want to say is that
12 Mr Charles Blé Goudé, he was the deputy national director in charge of the campaign
13 of candidate Laurent Gbagbo. Since we had 32 regions in Côte d'Ivoire, it means
14 that he was responsible for going to all those regions to mobilise the young people
15 and others to vote for Mr Laurent Gbagbo in those 322,000 square kilometres. That
16 is the land area of Côte d'Ivoire.

17 And I said that is not, cannot be compared to someone who is only dealing with the
18 land area of a department. So the difference is major. So if you have to give me €10
19 to go and work in Man, it would have nothing to do with someone who has to work
20 in the entire Côte d'Ivoire. That is what I mean.

21 PRESIDING JUDGE TARFUSSER: [15:38:35] Yes. And so I understood it. But do
22 you know, this is a following question, do you know how much a regional, a director
23 for a regional campaign, how many resources he had in your region, for example?

24 THE WITNESS: [15:39:04] (Interpretation) The departmental director of campaign,
25 to my knowledge, there had been placed at his disposal a tank of fuel to make it

1 possible to fuel vehicles, to travel to each area assigned to each person. And the
2 team responsible for campaign had to be fed, and campaign gadgets or items had to
3 be given to each person, and that included T-shirts, pins, caps, posters with the effigy
4 of President Laurent Gbagbo, for the entire duration of the campaign up until the day
5 that the campaign officially stops and then the elections take place.

6 PRESIDING JUDGE TARFUSSER: [15:40:21] So it was more a matter of goods than
7 of money, of gadgets, of material goods than of money?

8 THE WITNESS: [15:40:28] (Interpretation) Mr President, there is money, but I
9 cannot tell you how much. I didn't count the money. And I will explain to you the
10 case in our region. When you went to the rural areas, the remote areas, it was a
11 symbol to be able to speak in our own language to the population, to the chiefs, to the
12 women. You have to provide them drinks. You have to give them symbolic
13 amounts of money. It is our tradition. And that is -- it means that we are telling
14 our parents and relatives that we have come to talk to you about our candidate. And
15 these amounts varied depending on the land area of the village, the town, the
16 department or sub-préfecture.

17 But I cannot actually quantify the budget because I did not have access to information
18 at that level.

19 PRESIDING JUDGE TARFUSSER: [15:41:44] Okay. The OTP, Mr Garcia, please.

20 MR GARCIA: [15:41:47] (Interpretation)

21 Q. [15:42:05] I would just like to backtrack a little bit, Mr Witness. After a
22 supervisor was appointed, what was the nature of your relationship with Mr Charles
23 Blé Goudé as from that time on?

24 A. [15:42:24] We were distant from each other. We no longer had any contact, and
25 I have said I went back to my point of departure, to square one, that is, to my boss, the

1 supervisor. Well, it was a period that I can describe as a period of sabotage. And
2 the supervisor no longer kept me informed. We had the same objective, and I was
3 telling my own people that we have to look at the objective and not interests.

4 Q. [15:43:12] You say that you entered into a period of sabotage. Can you explain
5 what you mean by that? Was there anyone sabotaging you in your election
6 campaign?

7 A. [15:43:30] Yes, because in the field, in the west, there were young people who
8 were from COJEP, Mr Gbay Éric, for example, who was a friend of Mr Koué, he had
9 other friends, and they rushed to the field to say Évariste Yaké is not the campaign
10 manager, Charles does not know him, and that the supervisor is Mr Blé, and that he
11 does not have any resources; do not rely on him.
12 That is what happened. And those things were reported back to me. But what I'm
13 saying is that the most important thing for me was that my mission -- I had beaten
14 Pastor Gami in front of everyone, but my mission was what my boss Franck Guéï had
15 told me, to have our champion win, President Laurent Gbagbo.

16 Q. [15:45:06] Mr Witness, was Mr Charles Blé Goudé in any way connected to the
17 problems that you had in the field?

18 A. [15:45:18] I no longer had any contact with Mr Charles Blé Goudé. But Mr
19 Koué and Mr Gbay Éric and Mr Koué were Mr Charles' henchman, but the other one
20 was the representative of COJEP in the region.

21 Q. [15:45:42] Mr Witness, I will just -- 0062-0357, tab 3. I would like to refresh
22 your memory on this issue; page 0539, line 39 up to line 45. And you say, and I
23 quote, "That is where we stopped, and ever since that time, there was a rift between
24 Charles and myself."

25 The interviewer says: "Very well."

1 I think it is now on the screen. And you say, and I quote, "Yes, we did not speak on
2 the telephone any longer. We continued in that way. He tried through Blé Maurice
3 and others to create problems for me. But given my notoriety and given that I was a
4 descendant of the royal family, the reigning family, as they say."

5 A. [15:47:18] I remember.

6 Q. [15:47:19] Is that correct?

7 A. [15:47:20] Yes, I remember having said that. I have told you that Mr Blé and
8 myself were no longer in contact. It was finished, but Mr Gbay Éric, Mr Blé Maurice
9 and Mr Koué --

10 PRESIDING JUDGE TARFUSSER: [15:48:08] Well, we heard some music. Now we
11 are again listening to the witness.

12 THE INTERPRETER: [15:48:16] The computer has been switched off the site.

13 MR GARCIA: [15:48:27] (Interpretation)

14 Q. [15:48:28] And I will continue, Mr Witness. To refresh your memory, we are
15 still on page 0539, line 65, and I will go up to line 76.

16 "Interviewer: But what was he doing to create problems for you? What was he
17 doing exactly?" And your answer, and I quote, "No. But no, what is the problem?
18 Give the resources because he had the resources. He was very powerful financially.

19 Interviewer: Yes, yes."

20 Line 71, and I quote you: "And he was the man, the boss of the national campaign
21 directorate, appointed by the president. He himself said he is the son of the
22 president. He saw the president when he wanted, and so he gave people resources
23 to try to destabilise me because money could make it possible for me to divide. But,
24 thank God, I had a solid team that believed in me with whom I struggled all the time.
25 They visited all the villages on mission and they were speaking the truth."

1 That is what you said to the investigators?

2 A. [15:50:10] Yes, indeed. Mr Blé Maurice was the supervisor. As I have said
3 before, I had received 16 motorbikes. And after leaving the COJEP office where
4 there was a rift, I talked of sabotage because I'm talking about Gbay Éric and my
5 uncle Blé Maurice. Three or four times it was said that he was the one who had been
6 chosen by Charles Blé Goudé. And when that is said, then you find yourself in a
7 position of financial weakness. But fortunately, and when someone in the
8 field -- and as I have told you, I am a descendant of the royal family that rules over 68
9 villages; I have a mastery of our customs and all the time in the field. My young
10 people had stood by the truth, and they said that the objective was the victory of our
11 champion. They stood by my side with the little resources that the DDC had given
12 us and we carried out our campaign.

13 Q. [15:52:03] Just to conclude, I understand that what you told the investigators
14 was true?

15 A. [15:52:08] Yes.

16 Q. [15:52:08] This morning, I believe you also spoke about Charles Blé Goudé and
17 his movement COJEP. Can you tell us, to your knowledge, during that period, who
18 was financing Charles Blé Goudé and COJEP?

19 A. [15:53:08] I do not know. It was not my movement. I had no idea when he
20 called me, so I do not know.

21 Q. [15:53:27] Mr Witness, once again I will refresh your memory, and I'm referring
22 to transcript 0062-0574, and that is in tab 4. Just one moment. I am referring to
23 page 0594 and also 0595. So please display 0594 to the witness and I'll begin on line
24 708.

25 Mr Witness, I will read it to you, 0594, line 708:

1 Interviewer 2, and I quote: "Are you aware, without talking about COJEP and Blé
2 Goudé and then his COJEP, the resources that he used to attain their objectives?"
3 710, and you yourself, you said this, and I quote, "Oh, but Blé Goudé, I'm telling you
4 that Charles Blé Goudé, he's the son of the President Laurent Gbagbo.

5 Interviewer 2: Mm-mm."

6 Line 713: You say, "The president gives the resources."

7 Interviewer: Yes."

8 Line 715, and I quote you:

9 "And then there were the DGs, the major companies such as the port, the DG Marcel
10 Gossio. Well, it was the son of the president. So all the personalities knew that he
11 could see the president when he wanted, where he wanted. So everyone -- he had
12 the resources, he had an entire group of people, he had the entire army accompanying
13 him. He was the big boss, he was indeed the big boss."

14 A. [15:56:40] Thank you. On this point, if I remember correctly, when the
15 investigators asked me the question, I acknowledged, I said that Charles Blé Goudé
16 was the son of the president. Charles Blé Goudé saw the president when he wanted
17 to. The entire Côte d'Ivoire knows that.

18 Charles Blé Goudé had vehicles, he had security officers, all of Côte d'Ivoire knows
19 that. And I think that when you see these words, he's the son of the president, and
20 all the DGs, I heard that, and I'm telling you, and I mentioned Mr Marcel Gossio.
21 They were all brothers and friends of President Laurent Gbagbo and his collaborators,
22 and they knew that Charles was the political son of President Gbagbo, who was well
23 loved, and so they supported him.

24 I have told you that he had representatives in my region. He had representatives. I
25 have mentioned Gogon Guillaume, Gbay Éric and others. I heard about that. I

1 never accompanied Charles Blé Goudé to Gossio's house or to the president's house.
2 But when these elements were boasting that they had gone with their boss to see a
3 DG -- and everybody knew that on the TV when it came to the youth, when you saw
4 the big boss Laurent Gbagbo, it went without saying that you would see Charles Blé
5 Goudé. Even my boss, Dr Franck Guéï -- well, Charles Blé Goudé I can say saw the
6 president even more often than my boss, Dr Franck Guéï.

7 Q. [15:59:17] One question. You talked about Marcel Gossio. Who was he and
8 what was he doing at the time?

9 A. [15:59:32] He was the director general of the Abidjan Ports Authority.

10 Q. [15:59:47] You said others. Was there more than one DG that supported him or
11 was that the only one?

12 PRESIDING JUDGE TARFUSSER: [16:00:00] Maître Altit.

13 MR ALTIT: [16:00:02] (Interpretation) Thank you, Mr President. Mr President, I
14 would like to draw the Court's attention, the Chamber's attention to a nuance that
15 must be respected. My learned colleague has first put a question at the beginning,
16 namely who was funding Charles Blé Goudé and COJEP? A clear question -- a clear
17 answer from the witness, "I know nothing about it."

18 Now, in order to attempt to get another answer from him, he reads out a statement to
19 the witness in which an entirely different question, not that one, had been put to the
20 witness. Let me quote: "Are you aware of the resources they were using?"

21 And now we're going now into areas of impressions and speculation which --

22 THE INTERPRETER: Overlapping speakers.

23 MR GARCIA: [16:01:01] Your Honour, given -- I'm sorry. Given the fact that -- I
24 realise that Defence counsel is getting into the substantive part of what the witness is
25 testifying about. I think it would be very cautious, and we'd need to take that

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1 caution, to have the witness leave while Defence counsel makes his pleading on this
2 point if he desires to continue.

3 PRESIDING JUDGE TARFUSSER: [16:01:17] Yes. If you continue, it's better if the
4 witness goes out. But I know where you are going to because I can read also line 722
5 and 730 of the statement.

6 MR ALTIT: [16:01:37] (Interpretation) I defer to the Chamber for its decision in
7 whether to let the witness stay in or leave the courtroom. I have no problem with
8 that.

9 PRESIDING JUDGE TARFUSSER: [16:01:51] So let's let the witness leave the
10 courtroom for a few minutes. Can you please leave the courtroom accompanied by
11 the court usher.

12 (The witness stands down)

13 PRESIDING JUDGE TARFUSSER: [16:02:21] Maître Altit, you have the floor,
14 although you made it very clear what your opposition is.

15 MR ALTIT: [16:02:27] (Interpretation) Absolutely, Mr President. It's very clear.
16 We moved from a clear question to which a clear answer was given to attempting to
17 side step that clear answer by engaging in a matter of speculation. And what can I
18 say?

19 Now, we moved from clarity to an area where we say maybe he received some funds,
20 but we never accompanied him to such and such a place. And then we have another
21 question, which is the purpose of my objection. But in any event, I have lost my
22 thoughts. Let me hop back to a previous segment of -- here, here we are.

23 Now, Mr President, at page 79, line 2, "Who was Gossio?" question. "He was the
24 director of the Abidjan Ports Authority."

25 Fair and good. But then remember -- I need to slow down for the interpreters. But

1 he never said that he went with Gossio, because that question was never put to him as
2 to where, how and when he knew that he was given money. There was no
3 foundation laid for that.

4 So we have gone from speculation to the next question, which after having gotten him
5 to say who Gossio was, then you say, as the Prosecutor, from the French transcript,
6 you say the following at line 4, and I quote:

7 "You said others. Was there more than one DG who also supported or was he the
8 only one?" End of quote.

9 Now, we have quietly moved to the certainty that there was at least one DG who
10 supported them. So from speculation to speculation, we have gradually moved
11 from impression to certainty. And so we could ask the witness whether there were
12 other DGs who supported or funded Charles Blé Goudé.

13 Now, was there any point in time at which the witness said that he had clear
14 information about this? Was he asked to provide any information that can
15 substantiate this kind of assertion? So it's from speculation to speculation, but we
16 end up here from a question "Who was funding Charles Blé Goudé and COJEP?" to
17 which the answer was "I know nothing." And we are getting to a point where, in
18 spite of himself, the witness is now being asked to say whether there were any other
19 DGs who funded Charles Blé Goudé, whereas he said that he knew nothing about it
20 to begin with.

21 There's no foundation about who, when, why and where such a thing may have taken
22 place. If we don't proceed in that manner, I think we have to object. Mr President,
23 this is why I want to object and I think it is time for the Chamber to intervene on this
24 matter.

25 PRESIDING JUDGE TARFUSSER: [16:06:09] Mr Knoops.

1 MR KNOOPS: [16:06:10] Mr President, the Court is aware of the content of directive
2 41, yes. Now, there is not an issue about refreshing the witness memory or
3 confronting the witness with a contradiction in the event which is applicable here.
4 The witness in his statement that the Prosecution didn't cite confirms that he never
5 directly heard from Mr Blé Goudé how the funding went. That's line 727, 728.
6 So there is no contradiction with his statement to the Prosecution and his testimony
7 today. Neither is there reason to refresh the memory, because the witness clearly
8 said he has no direct knowledge on the funding. And therefore I think it's not
9 appropriate to put a statement to the witness which is, by the way, also a selection of
10 that page, because if you read further in line 740, the witness confirms that he has no
11 direct source, no direct knowledge on the funding.
12 And therefore the confrontation with the earlier statement in this situation is in
13 contravention with the directive 41.

14 PRESIDING JUDGE TARFUSSER: [16:07:36] Well, and I was going to intervene
15 before you intervened because I think if you read 722 and 730, his knowledge is based
16 on what the people are saying and television. So there is no real contradiction in
17 what he said. The knowledge he had at that time was knowledge through television
18 and other people, what he heard, and here he just said he does not know, if not from
19 other sources, of course.

20 Therefore, I think we should really not overstretch the concept of confrontation as
21 opposed to refreshing the memory, because there is nothing to refresh the memory
22 when one says, "I don't know." Then it's a matter of confrontation, if there is
23 something contradicting what he says here.

24 MR GARCIA: [16:08:38] Your Honour, just to be, just to be clear on the matter, I did
25 use the term obviously "refresh the memory." I could have used the term of

- 1 "confronting the witness." The witness says, it's not the first time --
- 2 PRESIDING JUDGE TARFUSSER: [16:08:49] Yes, yes, of course.
- 3 MR GARCIA: [16:08:50] The witness says he doesn't know.
- 4 PRESIDING JUDGE TARFUSSER: [16:08:52] No, but --
- 5 MR GARCIA: [16:08:53] And then there is information -- I'm sorry.
- 6 PRESIDING JUDGE TARFUSSER: [16:08:57] Yes, but one is if the witness doesn't
- 7 recall, he says, "I can't remember," then you refresh the memory. If the witness
- 8 makes a statement and this statement is contradicted by what he said before, then it's
- 9 a matter of confrontation, which is something different.
- 10 MR GARCIA: [16:09:12] Your Honours, I do take note obviously, and in some
- 11 occasions I understand that refreshing the memory may be a preliminary step before
- 12 doing a confrontation. And that was the objective of the exercise.
- 13 Despite the words that we used, the witness said he didn't remember or he didn't
- 14 know. This is information that he does know. Despite or regardless of the source
- 15 of that information, that's a matter for the reliability of that information later on. But
- 16 that's why I confronted the witness with his prior statement, simply for that. And I
- 17 can obviously, while the witness is present I can ask him questions about what he
- 18 knows, if he knows anything further and from what possible source.
- 19 PRESIDING JUDGE TARFUSSER: [16:09:49] But now we know. We have it on the
- 20 record. So now we know it. We have it on the record. And then we will use
- 21 argumentatively this what is on the record. So I think it's better to go ahead if you
- 22 don't want to insist on this for other matters.
- 23 MR GARCIA: [16:10:10] Duly noted, your Honour.
- 24 PRESIDING JUDGE TARFUSSER: [16:10:11] Okay. Thank you.
- 25 The court usher should bring the witness in the courtroom again. I can use -- no, I

1 can't because he's coming.

2 (The witness enters the courtroom)

3 PRESIDING JUDGE TARFUSSER: [16:10:49] The floor is back to the Office of the
4 Prosecutor, Mr Garcia.

5 MR GARCIA: [16:11:40] (Interpretation)

6 Q. [16:11:41] Mr Witness, let me revisit part of your answer at page 78, line 24 and
7 25, and you said, "I said Blé Goudé used to see the president because even his boss,
8 Dr Franck Guéï --" can you finish off that assertion? What did you want to say?

9 A. [16:12:19] What I was saying was that it was not Blé Goudé's boss, it was my
10 boss. Dr Franck Guéï was my boss, not Blé Goudé's. He was the president's special
11 advisor. So what I was saying was that we didn't see him as often because when he
12 was going to see the president, we more or less knew, because he would tell us "I
13 have an appointment with the big boss," and what I'm saying is that Blé Goudé had
14 more access to the president than my boss. That's what I meant.

15 MR ALTIT: [16:13:14] (Interpretation) Monsieur le Président.

16 PRESIDING JUDGE TARFUSSER: [16:13:22] Maître Altit.

17 MR ALTIT: [16:13:23] Thank you. I'm sorry to rise while my colleague had the
18 floor, but I think, Mr President, that it will be fair to lay foundations properly and
19 then ask logical questions that lead up to the type of question he has asked. Now,
20 when you say "did Blé Goudé see the president often? Answer: Yes," but there
21 must be a question before that. Was it possible for you to become aware of this?
22 That is the problem I have. And this is what they're doing all the time. I didn't rise
23 because I was hoping that things would get better. But we've gotten to the point, Mr
24 President, where I think that the Chamber has to intervene.
25 The examination, any examination, must be logical and we need to respect it,

1 otherwise we get the witness to say things that he is not saying.

2 And furthermore, it makes things difficult for the judges and the parties thereafter to
3 come to a clear opinion as to what has transpired in the courtroom. That's what I
4 wanted to say, Mr President.

5 PRESIDING JUDGE TARFUSSER: [16:14:26] Mr MacDonald.

6 MR MACDONALD: [16:14:26] Yes, I'm standing up, your Honour, because it's a
7 recurring -- it's a recurring theme for this witness but also other witnesses. And I'm
8 going to switch in French, actually.

9 (Interpretation) No, our questions do not seek to put words into the witness's mouth.
10 And I believe that this is very clear going by the answers from the witness.

11 (Speaks English) So the point being, your Honour, is that constantly Mr Altit is
12 standing up, interrupting our questioning, always stating that there should be a
13 foundation. We are conducting our examination as we see appropriate. There is an
14 opportunity for the Defence to ask questions, and they can come back on that. And
15 if there is no foundation to our questions, well, the weight will be low or nonexistent
16 and we will suffer from that in the closing brief.

17 But that's a choice that we make with our burden of proof. So I would kindly
18 request the Chamber to reject the objection and to remind Mr Altit that we conduct
19 our invest -- questioning, sorry, as we see appropriate, within the boundaries as set
20 up by the directives and the instruments of the Court. Thank you.

21 PRESIDING JUDGE TARFUSSER: [16:16:14] Well, this intervention, this objection is
22 rejected because the examination is simply -- is simple: A matter of questions and
23 answers.

24 The matter of laying a foundation is not a legal concept, laying a foundation. It's a
25 matter of asking, of asking simple questions and having answers by the witness on

1 facts.

2 And therefore, because if you lay a foundation, then -- or if you put a question, any
3 question has a foundation to be laid. So I do not understand the concept.

4 So I just invite the Prosecutor to put questions and have answers. And if the witness
5 is able enough to say "I don't know, I can't remember", or to respond truthfully the
6 way he thinks to respond.

7 Please go ahead.

8 MR GARCIA: [16:17:24] (Interpretation)

9 Q. [16:17:35] Mr Witness, at page 85 you said, lines 5, 6, and 7, "But I told you that
10 Charles Blé Goudé had access to the president more than my boss. That's it."
11 How do you get to know that he -- how did you get to know that he had more access
12 to the president, more access than your boss, Mr Franck Guéï?

13 A. [16:18:01] Dr Franck Guéï, my boss, while I had the luck that we were together,
14 and whenever he had to see the president, he would tell me most of the time. So
15 when I knew that in a month or two or three I would ask him "have you seen the
16 big -- the chief?" "No, I have not been able to see him. I have asked for an audience.
17 They are going to call me back. But the chief is busy. I'm going to see him at some
18 point because I have to update him on this and that. What do you think about it?
19 Do you think that the number of material is enough?"

20 Well, he usually put questions to me to seek my opinion. So from that I say that he
21 didn't -- it wasn't regular. That is why in my mind I came to the conclusion that
22 when there were any political events involving youth and politics, in most of the
23 cases when the big chief was there, that is, when President Laurent Gbagbo was
24 present, Charles Blé Goudé would be there. That's it.

25 Q. [16:19:31] Very well. Thank you, Mr Witness.

1 As far as you can recall, was there any complaining around and about? Were people
2 complaining about matters of distributing money for the election campaign?

3 A. [16:20:22] I have not understood your question. Please.

4 Q. [16:20:30] As far as you know, did you become aware at any time that people
5 were complaining around Mr Charles Blé Goudé about the distribution of money for
6 the election campaign?

7 A. [16:20:46] I heard some things, but I couldn't crosscheck. I couldn't verify it
8 because I was somewhat distant from him.

9 Q. [16:20:59] What you heard was in relation to who?

10 A. [16:21:05] In relation to other leaders. I've already told you that, if I'm not
11 mistaken, the youth of the JFPI, President Laurent Gbagbo's party, our champion,
12 those youth did not appreciate -- and I heard that. They didn't appreciate the choice
13 of Charles by the president. They didn't -- that's something I heard. And I didn't
14 crosscheck, but I can tell you that I heard or I wasn't there, and that the youth were
15 beginning to feel -- to feel somewhat cheated.

16 Q. [16:22:08] When you talk about other leaders of JFPI youth, who are you
17 referring to?

18 A. [16:22:24] Well, obviously JFPI had people like Damana Pickass; there was
19 Konaté Navigué, that was the JFPI. That's President Laurent Gbagbo's party, JFPI.

20 Q. [16:22:52] Can you say a little more whether there were any complaints about
21 money?

22 A. [16:23:08] No, no, I don't have any recollection of that.

23 Q. [16:23:14] I will try to jog your memory on this specific point. And I refer here
24 to tab 3, CIV-OTP-0062-0537, at page 0550. I'll start at line 439. I see the document
25 is already displayed for you. Line 443, and you were speaking, I quote: "I

1 remember there was a meeting at Man where Koua Justin, the one who was there
2 today, they came to Man. I was the one who went to see the minister. Koua Justin
3 came with Gaoudé Alain. The fédéral de jeunesse Gaoudé Alain was the one who
4 brought him. I am the one who went to see the minister Bleu-Lainé. They were at
5 the hotel. They did not even have -- there was no way of asking for 100,000. And
6 the minister gave me some money, and I came and I gave them 100,000 francs CFA.
7 Interviewer number 1: Navigué Konaté and Koua Justin, what were they
8 complaining about?
9 They were complaining that they --"
10 And you yourself: "Well --
11 Interviewer number 1: All resources have been given."
12 And then you: "To Blé
13 Interviewer 1: To Blé?"
14 And then you -- you said, "Oui", yes.
15 "Interviewer number 1: Yes. He did not distribute that to them for them to also
16 carry out the campaign."
17 And then you: "Yes, that's it.
18 Interviewer number 1: What was the issue about, 'Oh, they would also like to eat
19 some money?' What was that about?"
20 You yourself: "Well, it's a question. Well, in any event, in any event, we must call a
21 cat, quote, 'You cannot run a campaign without eating.'
22 Interviewer 2: Mm-mm."
23 Then you yourself: "Huh, well, at least.
24 Interviewer 1: So they were complaining that all the money was instead going to --"
25 Person interviewed, that is yourself: "Yes, he was the one managing.

1 Interviewer 1: To Blé, who was the director of --" and then you, I quote, "Yes, there
2 you have it. He only gave it to his friends and to those who were in his network."

3 A. [16:26:48] Yes, thank you. I do effectively recall that my younger brother, Koua
4 Justin, a member of the JFPI bureau, and the young brother Gaoudé Alain, who was a
5 federal of the JFPI as well, we were together in Man. When Koua Justin and Alain
6 Gaoudé conducted a mobilisation visit, they came and met me in Man. The young
7 brother, small brother, Koua called on me at the hotel when they were in Man. And
8 I told them, "Well, you see, you cannot come on a mission, all three of you of the
9 president's party, and you tell me that you don't have money."

10 So he said, "No, we don't have money. It is Blé who had all the money. He was the
11 one managing all the money."

12 Now, so I said, "Well, the JFPI, isn't it all of you working together?"

13 And I said "No, no" --

14 And they said, "No. We know nothing about it. We came together but we don't
15 have any money."

16 So I said, "Okay. Remain in the hotel. I will see what I can do. Since you have
17 come here for the same purpose, that is for the campaign of Mr Laurent Gbagbo, I will
18 do whatever I can to see the DDC, since my boss was not present, and I will convey
19 your concerns to him."

20 So I went to the DDC, the minister, and I told them that some JFPI youth leaders had
21 come to galvanise the people and that they were having a little bit of a problem and
22 needed some support. And so Minister Gilbert Bleu-Lainé gave me 100,000 francs,
23 which I took back to them and I handed it over to them. They were extremely happy
24 to receive that kind of money.

25 Q. [16:29:24] You also told the investigators that he gave it only to his friends and

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1 to all those who were in his network. As far as you know, what did that network
2 refer to? His network, what did that refer to?

3 A. [16:29:45] The network was members of COJEP, of his movement, his friends,
4 the friends with whom he was frequently with, people whom he had known for a
5 very long time.

6 Q. [16:30:05] Who are those friends whom he had known for a very long time?

7 A. [16:30:10] He had his friends. Ahoua Stallone was one of them. I can also
8 mention Jean-Yves Dibopieu. I can also talk about Ani Tchélé (phon). I can also
9 mention Élie Hallassou. And there was also Idriss Ouattara. Yeah, yeah, those,
10 those are his friends, some of them.

11 MR GARCIA: [16:30:57] I see the time, your Honour. Thank you.

12 PRESIDING JUDGE TARFUSSER: [16:31:00] We break here. One question is
13 obviously to the Prosecutor, how much time he will need to conclude his examination,
14 his questioning of this witness.

15 MR GARCIA: [16:31:14] Your Honour, I will, just to preface that, my answer, I will
16 work tonight obviously to narrow the line of questionings for tomorrow, given that
17 we have some time, and I will be completing my examination-in-chief in the first
18 session tomorrow morning.

19 PRESIDING JUDGE TARFUSSER: [16:31:30] Okay. So the Defence of
20 Mr Blé Goudé, which I think is the one questioning first, as I learned, is advised to
21 start immediately and -- well, therefore the hearing is concluded for today, and we
22 adjourn to tomorrow morning at 9.30. Thank you very much.

23 THE COURT USHER: [16:31:59] All rise.

24 (The hearing ends in open session at 4.32 p.m.)