

Trial Hearing
WITNESS: CIV-OTP-P-0184

(Open Session)

ICC-02/11-01/15

1 International Criminal Court
2 Trial Chamber 1
3 Situation: Republic of Côte d'Ivoire
4 In the case of The Prosecutor v. Laurent Gbagbo and
5 Charles Blé 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 Monday, 4 December 2017
10 (The hearing starts in open session at 9.36 a.m.)
11 THE COURT USHER: [9:36:25] All rise.
12 The International Criminal Court is now in session.
13 Please be seated.
14 PRESIDING JUDGE TARFUSSER: [9:36:49] Good morning. Good morning in
15 particular to you, Madam Witness. It's now -- today we start with your testimony,
16 and in order to start properly, I would ask you first of all to give us your full name.
17 What is your name and surname first; first name and surname?
18 WITNESS: CIV-OTP-P-0184
19 (The witness speaks French)
20 THE WITNESS: [9:37:38] (Interpretation) My name is Sirah Dramé.
21 PRESIDING JUDGE TARFUSSER: [9:37:41] And when and where were you born?
22 THE WITNESS: [9:37:44] (Interpretation) On 20 July 1970 in Adjamé.
23 PRESIDING JUDGE TARFUSSER: [9:37:56] And you're an Ivorian citizen?
24 THE WITNESS: [9:37:59] (Interpretation) Yes, your Honour.
25 PRESIDING JUDGE TARFUSSER: [9:38:00] Can you tell us your faith and your

1 ethnicity?

2 THE WITNESS: [9:38:12] (Interpretation) I'm a Muslim and I'm from the Malinké
3 group.

4 PRESIDING JUDGE TARFUSSER: [9:38:17] Thank you. And what is your
5 occupation? Do you work?

6 THE WITNESS: [9:38:20] (Interpretation) I work at the Abobo town hall. I am a
7 municipal councillor.

8 PRESIDING JUDGE TARFUSSER: [9:38:32] And at the time of the crisis?

9 THE WITNESS: [9:38:34] (Interpretation) I was still at the town hall. I was a
10 councillor, that is to say, an alderwoman.

11 PRESIDING JUDGE TARFUSSER: [9:38:46] Thank you. Now I would like to tell
12 you or assure you that in any case you have a need or you are tired, you want to have
13 a break, you have any issue, please address it to me and then we will take care of it.
14 If anything arises, any problem arises, okay?

15 THE WITNESS: [9:39:12] (Interpretation) Yes, your Honour.

16 PRESIDING JUDGE TARFUSSER: [9:39:18] You are testifying in French, I'm
17 speaking in English, so you'll hear me through interpretation. This means that we
18 have --

19 THE WITNESS: [9:39:30] (Interpretation) Yes, your Honour.

20 PRESIDING JUDGE TARFUSSER: [9:39:31] That we have people in the booth
21 interpreting and in order to allow them to do the best job possible, we have to speak
22 slowly. So please speak slowly when you speak so that interpreters and court
23 reporters can write down and interpret properly. And this will be especially
24 important when you are questioned in French. So just continue to speak slowly and
25 think about the interpreters. Now, it is possible that during the testimony I give you

1 a sign with the hand, which means only to slow down, okay.

2 As you are for sure aware, this Chamber has been established to try the case of the

3 Prosecutor against Mr Gbagbo and Mr Blé Goudé. And you are here as a witness.

4 And as a witness, you have the obligation to answer questions by the lawyers in this

5 courtroom, by the Office of the Prosecutor, by the Defence teams and by the Legal

6 Representative of Victims. But even more than answering, you have to answer

7 truthfully. Do you understand that you have to say the truth?

8 And the law to this effect asks you to make a solemn undertaking and, therefore, I

9 would ask you to read out the formula you have in front of you.

10 THE WITNESS: [9:41:30] (Interpretation) I solemnly declare that I shall tell the

11 truth, the whole truth and nothing but the truth.

12 PRESIDING JUDGE TARFUSSER: [9:41:40] Thank you very much. Now, the last

13 information I have to give you is that giving false testimony is an offence against the

14 Court and, as an offence against the Court, it is punishable. So you do understand

15 this? Did you understand this?

16 THE WITNESS: [9:42:07] (Interpretation) Yes, your Honour.

17 PRESIDING JUDGE TARFUSSER: [9:42:10] So now if you are ready I give the floor

18 to the Office of the Prosecutor. Are you okay? You are ready?

19 THE WITNESS: [9:42:21] (Interpretation) I am ready, your Honour.

20 PRESIDING JUDGE TARFUSSER: [9:42:26] So I think, Madam Berdennikova, yours,

21 the floor.

22 MS BERDENNIKOVA: [9:42:31] Thank you, Mr President, your Honours. Good

23 morning.

24 QUESTIONED BY MS BERDENNIKOVA: (Interpretation)

25 Q. [9:42:37] Good morning, Madam Witness.

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1 A. [9:42:39] Good morning.

2 Q. [9:42:40] Thank you for attending court today. My name is Maria

3 Berdennikova, and I am the counsel from the OTP who will be putting questions to
4 you today.

5 A. [9:42:55] Very well.

6 Q. [9:42:56] We already had an opportunity to meet during the courtesy meeting
7 last week, and I mentioned to you already that I will be putting questions to you in
8 English because my English is stronger than my French. But we will be able to
9 understand one another just fine, thanks to our interpreters. I'll now switch to
10 English.

11 (Speaks English) Now, you've probably already noticed that I'm referring to you as
12 "Madam Witness." Please don't take it as a sign of disrespect. It's just a kind of a
13 custom that we have here in the courtroom.

14 And now before we start, I just want to let you know that the Judges have already
15 heard quite a lot of evidence in this case. There is quite a lot of evidence on the
16 record. So that means that today we're going to try to be very focused, also given the
17 limited time frame that we have, so we will not necessarily cover all the topics that
18 you mentioned in your statement, but we will concentrate on certain, specific ones, all
19 right?

20 So just I will ask you to listen to my questions very carefully. But if ever you don't
21 understand something I've said, or something I've asked you is not clear, just let me
22 know and I will repeat or rephrase my question so that we all understand each other
23 well, all right?

24 A. [9:44:29] Yes, Counsel.

25 Q. [9:44:31] And, of course, one last thing, if you need a break at any point, please

1 let the Judges know or let me know, okay.

2 Now, you already mentioned that you were councillor at Abobo's town hall during
3 the post-electoral crisis in 2010-2011. Can you tell us if you had any other main
4 functions during that time?

5 A. [9:44:59] Yes. I also was working in a dry cleaner. That is my profession,
6 actually.

7 Q. [9:45:11] It's my understanding that you were also, and I'll quote the title in
8 French, the secrétaire général du rassemblement des femmes républicaines d'Abobo?

9 A. [9:45:25] Yes, I am, that is correct. I am the political commissioner and the
10 general secretary representing *RDR Abobo women.

11 Q. [9:45:35] And since when have you been a member of the RDR?

12 A. [9:45:41] Since 1994.

13 Q. [9:45:49] Now, Madam Witness, I understand that another one of your functions
14 at this time was, and again I will quote this in French, (Interpretation) President of a
15 group of women who had been victims of the events of *March 2004.

16 A. [9:46:07] Yes, indeed. When the 2004 events occurred, I was the head of this
17 group of victims of the events of *2004.

18 Q. [9:46:21] So you mentioned the events of 2004, can you liberate a little bit more
19 of what these events were?

20 A. [9:46:27] Yes. In 2004 we went out and took to the streets to support the
21 Linas-Marcoussis key agreements. To our great surprise we were fired upon by
22 MV24s. Many people died and there were many people injured as well. And I
23 myself was injured. I'm a victim too.

24 THE INTERPRETER: [9:46:52] Interpreter correction: The weapon mentioned was
25 Mi24s.

1 MS BERDENNIKOVA: [9:46:59]

2 Q. [9:47:00] Now, let's take this a little bit more slowly. Do you remember when
3 these protests took place?

4 A. [9:47:07] On 24 March 2004.

5 Q. [9:47:13] And are you sure that it was 24 March? Could it have been 25 March?

6 A. [9:47:22] The 24th. It began on the 24th and it continued into the 25th and
7 the 26th.

8 Q. [9:47:33] And can you tell us where exactly did these protests take place?

9 A. [9:47:38] All over the commune of Abobo. We were supposed to go out very
10 early in the day. But, you see, we were confined to our neighbourhoods and we
11 couldn't get out. But it was really, in actual fact, throughout the entire -- all the
12 districts of Abidjan. People, you see, they started to fire upon us. People went back
13 into their neighbourhoods and they used Mi24s to fire upon us, *and in Anonkoua.

14 Q. [9:48:19] All right. Before we go into more details of what happened during
15 these protests that you already started talking about, can you just explain what your
16 role was in these protests?

17 A. [9:48:33] As I said earlier, Abobo is divided into 24 sub-neighbourhoods. In
18 each sub-neighbourhood there are political officials. And I am the political official
19 for *the Bocabo district, but I live in Clouetcha. And when there were
20 demonstrations, I had to go to my district and coordinate activities. And at the same
21 time, I'm the general secretary of the women's group within the Rassemblement des
22 républicaines. And I also coordinate and organise the women. So I mobilise
23 women as well, encourage them to be active. So, you see, I'm an organiser and at the
24 same time a coordinator.

25 Q. [9:49:23] So I know that you mentioned these protests were organised in order

1 to support the Linas-Marcoussis accords. Was that the main purpose? Was there
2 another purpose for these protests?

3 A. [9:49:46] No. It was to show our support for the Linas-Marcoussis agreements.

4 Q. [9:50:00] All right. So let's concentrate on what you yourself did then on the
5 day of the protest.

6 Now, what was the planned itinerary for you that day?

7 A. [9:50:15] No. That day we were supposed to go out and march. There was
8 supposed to be a march at the Plateau, but we were not able to actually leave our own
9 commune.

10 Q. [9:50:30] Why couldn't you leave your district?

11 A. [9:50:39] It was very early in the morning. We were surrounded by the
12 Defence and Security Forces, and they were shooting at people indiscriminately. So
13 that day many people died. Many people were injured. It was impossible to exit
14 our neighbourhood. We were confined to our neighbourhood, our commune. And,
15 you see, they were shelling *Anyama and Anonkoua.

16 Q. [9:51:09] Do you see the forces that attacked?

17 A. [9:51:16] Yes, we saw them. We were supposed to leave our neighbourhood
18 and we got to the asphalted road. And we were there on the asphalt road, and saw
19 the Defence and Security Forces there. They were armed and they were *firing.
20 We ran, we scattered, we ran down alleyways. They kept on firing at us. As soon
21 as we exited, or were visible, they fired upon us. And in actual fact, the younger
22 brother of my husband died that day. He was sent to *the Clouetcha hospital and he
23 died. There were many people who were killed or injured that day.

24 Q. [9:52:08] Madam Witness, we're going to discuss the specific victims of this
25 incident shortly. Just before we get to that, do you remember what the FDS forces

1 were wearing on that day and what they were armed with?

2 A. [9:52:24] They had guns, guns. I'm not a soldier. I don't know the names of
3 the specific weapons, but they were armed. I don't know the names of the actual
4 weapons.

5 Q. [9:52:52] Now, you mentioned that you yourself were injured during this
6 protest.

7 A. [9:53:01] Yes.

8 Q. [9:53:02] Did you seek any medical assistance for your injury?

9 A. [9:53:08] Yes. I went to the Clouetcha hospital and I even brought some other
10 people to the hospital as well, because the hospitals were closed down, and it was the
11 Clouetcha hospital that was operating that day. So we took injured people to the
12 Clouetcha hospital to that day.

13 Q. [9:53:32] Can you tell us what happened when you got to the hospital?

14 A. [9:53:33] We got to the hospital. We had sent injured people there. And at
15 one particular point we heard gunfire at the hospital. The Defence and Security
16 Forces came to the hospital and said that a lady was sending injured people to the
17 hospital. So, you see, people were being sent to the hospital and they said that a
18 woman, in particular, was sending people to the hospital. But at the hospital they
19 had received instructions not to provide care to the injured.

20 *As council member, I put pressure on the hospital officials, and I said, no, they had
21 to help these injured people. They agreed. And in a few minutes, the Defence and
22 Security Forces arrived. And they said, "Oh, this lady is sending injured people
23 there." *And this person called Dosso Mamadou said, "No; there is no one here."
24 And, you see, when we heard them coming we hid inside. And the police officers
25 were saying, "Well, there is a lady who is sending injured people to the hospital."

1 And then he said, "*There is no one, but, you can search if you like." He said, "Go
2 ahead and search if you like." They were talking amongst themselves.
3 And one of them said, "Maybe it's not true. Maybe there is no one. Let's go."
4 So they left and we fled. We got out of there. We hid in the spot where the bodies
5 were kept. *One of my brothers called Dagnogo Lassina was there. He is the
6 Clouetcha district secretary. I was with him that day at the hospital. And we hid,
7 you see, right in the middle of the bodies so that they could not find us.

8 Q. [9:55:44] All right. Just a small clarification question before we move on. You
9 mentioned the FDS forces at the hospital. How do you know that they were FDS
10 forces?

11 A. [9:55:57] When you are lying down close to the door, I saw their footwear.
12 They were wearing ranger boots, and I heard what they were saying. *Before they
13 actually got there, they were firing. They were firing up in the air, in all directions,
14 just any old way, and this attracted our attention.

15 Q. [9:56:20] Now, just before we complete on this topic, can you give specifics of
16 any other victims of this incident?

17 A. [9:56:34] I beg your pardon?

18 Q. [9:56:40] I'll rephrase my question.

19 Did you see anyone being injured, with your own eyes, on that day?

20 A. [9:56:50] Yes, I saw things myself. I saw a great many things. They caught
21 one lady by the name of Kpehui Adeline. And they shot right into her vagina right
22 in front of us. And that was a march that was organised by the RHDP. And that
23 lady, Adeline was her name, they caught her and they shot right into her vagina, right
24 in front of us. You can check with *the Clouetcha hospital. She was sent to the
25 hospital. Unfortunately she died there. They beat people up in front of us as well.

1 Q. [9:57:34] And do you know in total about how many victims were there as a
2 result of this incident?

3 A. [9:57:41] There were many injured people, many people were injured. I
4 couldn't tell you exactly, but there were a lot that day.

5 Q. [9:57:51] And what about the number of people who died, who were killed?

6 A. [9:58:00] There were many victims. In some cases -- 56, 56 bodies that were
7 buried. And we went to see the prime minister of the day, Seydou Elimane Diarra
8 was his name, and he helped us get the corpses. The corpses that we were able to
9 bury were 56 in number. Some bodies were at IVOSEP. *Some were at INTERFU
10 at the Anyama morgue. And, you see, some bodies were never recovered, and those
11 people have gone missing and have not been seen since. But I can tell you there
12 were 56 bodies. They were buried at carré des martyrs in Abobo.

13 Q. [9:58:59] So now let's move on to another topic. What I would like to do is
14 discuss with you the presidential elections of 2010. So we'll skip over a few years.
15 And can you tell us what was your role during the electoral campaign of 2010?

16 A. [9:59:17] During the election campaign in 2010, as I was telling you, I was a
17 political commissioner within the Bocabo district and, at the same time, the secretary
18 of the women's section of the RDR. So I was responsible for the women. And my
19 district, I had to manage that as well.

20 Q. [9:59:45] Okay. So we all know that the first round of the elections took place
21 on 31 October 2010. Now, can you tell us what you were doing the day before, so
22 on 30 October 2010?

23 A. [10:00:08] On 30 October 2010, that is the eve of the events. We had to ensure
24 that everything went well. On the day of the elections, we had to bring together all
25 our polling officers, and then we gave per diems to the women to be able to cook food

1 on the day of the elections and also gave our people authorisations to represent us.

2 So with Adama Maïmouna Touré, our president, we were all at the town hall with the
3 women to organise.

4 Q. [10:01:03] Was there a meeting held at the town hall on that day?

5 A. [10:01:08] Yes, indeed. There was a meeting. We called our tellers to give
6 them instructions. And so we were with our tellers and the women who had to do
7 the cooking. We were with them on that day in the town hall.

8 Q. [10:01:31] And were all the supporters able to make it to that meeting?

9 A. [10:01:38] No, it was not all the militants. This was specified individuals, those
10 who had to be present in the polling stations and all who had to be responsible for
11 cooking in the town hall. We were with our delegates.

12 Q. [10:02:02] All right. I'd like to now turn to the second round of the elections.
13 All right. That was on 28 November 2010. Now, first of all, could you circulate
14 freely in Abobo prior to this round of elections?

15 A. [10:02:35] No. We were not free to move around in Abobo during the second
16 round, because already after the first round there had to be a second round. So there
17 was tension. So the Young Patriots and the young people *of the LMP were saying,
18 no, a Mossi can't rule. Those of us from the north, we were targeted. We could not
19 even wear boubous.

20 Q. [10:03:14] And could you leave your houses in the evening before the elections?

21 A. [10:03:22] For the elections of the second round?

22 Q. [10:03:26] Sorry. Was there any restriction on you being able to leave your
23 homes on the eve of the second round of the elections?

24 A. [10:03:34] On the eve of the second round it was difficult. It was impossible to
25 go out on the eve because even during the day people had died, so at night no one

1 could go out.

2 Q. And what were you doing on the day before that second round?

3 A. [10:04:08] The day before the second round, as I have told you, I was with
4 Madam Touré Maïmouna. She is the president of the women's wing and I am her
5 secretary. Every day before a feast we have to bring -- before the vote we have to
6 bring women and give them money for cooking for the tellers. We had our own
7 tellers at the town hall. And they were there with the CTEs. Those are the people
8 who had to train them. There was the mayor of the council. We were with our
9 departmental leaders.

10 Q. [10:04:59] What time of day was this?

11 A. [10:05:05] This was at about 9 a.m.

12 Q. [10:05:09] So you were in the town hall together with Maïmouna Touré?

13 A. [10:05:15] Oui.

14 Q. [10:05:15] Where exactly in the town hall were you?

15 A. [10:05:21] We were in her office upstairs because she was a bailiff at the town
16 hall. And we were in her office. Suddenly we heard gunshots. We looked
17 through the window and we saw people wearing fatigues. They were armed. But
18 they were hooded. There were at least four of them, and they came and parked
19 *their car at the roundabout. And since they were shooting indiscriminately, we laid
20 down so as not to be hit by stray bullets. They fired and fired and fired, and then
21 after that we got up. And in the courtyard of the town hall, there were two bodies,
22 *in the backyard of the town hall, there was also one body, so there were injured
23 people on that day. One of the injured persons who was known as Tonton Coulibaly
24 that I know very well, he was a friend to the husband of my elder sister; *he's the one
25 who was lying in the backyard.

1 Q. [10:06:39] And how old was Tonton Coulibaly?

2 A. [10:06:42] He was an adult about 50 years old or more.

3 Q. [10:06:48] Do you know who were the other victims that you just mentioned?

4 A. [10:06:54] Well, I know some other victims, but I have a colleague who is a political
5 commissioner, and *his son was hit by a bullet. He was with us that day on the town
6 hall. His son was hit. We had taken a doctor to take care of the injured people. His
7 name was Dr Keita. So he came and examined the child, so we had medical help.

8 Q. [10:07:33] I'd just like to turn back very quickly to the uniformed men that were
9 shooting that day. How many of them did you see?

10 A. [10:07:46] There were four people. I saw four people.

11 Q. [10:07:54] And you mentioned that they arrived in a vehicle. Can you describe
12 what this vehicle looked like?

13 A. [10:08:06] I really no longer remember. I don't know whether it was a truck or
14 a pickup.

15 Q. [10:08:19] Now, when the shooting started, how long approximately did it last?

16 A. [10:08:37] I no longer remember.

17 Q. [10:08:41] And can you describe which direction this fire was coming from?

18 A. [10:08:48] They were at the roundabout of the town hall, the town hall of Abobo.

19 Q. [10:09:13] All right. So we will be changing topic again. It's all right?

20 A. [10:09:21] Yes, that's fine.

21 Q. [10:09:26] Let's move on to December now. Let's talk about the march on the
22 RTI. Now, do you recall the date of the march on the RTI?

23 A. [10:09:39] It was on 16 December.

24 Q. [10:09:41] And when did you learn about this march?

25 A. [10:09:48] On the eve, I was called by my president, Madam Touré Maïmouna,

1 who told me that a march was scheduled to go and liberate the RTI because President
2 Alassane Ouattara had appointed a director and he had to be installed. So it was at
3 the request of Mr Soro Guillaume, the president of the national assembly. He is the
4 one who had organised that march to go and liberate the RTI on that day. Madam
5 Touré called me to invite the women to assemble at the *PDCI headquarters and start
6 the march.

7 Q. [10:10:52] And did any of these -- of the women go to the seat of the PDCI?

8 A. [10:10:57] Yes, because, on the eve, some of them went there. I was there. We
9 did not go out. We were waiting for D-day to take the vehicles -- or, rather, to go.
10 But others went there on the eve to spend the night there in order to go to the RTI.
11 So these women were beaten *at the PDCI headquarters. People were even killed
12 *there. I know one woman, Madam Tetty, who was one of our district officers, and
13 she was injured at that day on the PDCI seat because she went there on the eve.

14 Q. [10:11:42] Okay. Let's just pause on that incident at the seat of the PDCI. Can
15 you be more precise as to the date when this happened?

16 A. [10:11:47] The incident at the PDCI headquarters, it was on the same day, the 16th.
17 Well, the march had to take place on the 16th. Very early in the morning, well, I was not
18 there, but it was Madam Tetty who called me to say that she had been injured. We were
19 in Abobo. We had not been able to go out *because shooting was still going on.

20 Q. [10:12:26] All right. We understand that you were not there at the seat of the
21 PDCI, but do you know who attacked the women that were there?

22 A. [10:12:35] I don't know.

23 Q. [10:12:44] All right. So let's now turn to your own activities. And, first of all,
24 did you take part in the RTI march on 16 December?

25 A. [10:13:00] Well, we had to go out. I even left my house. And when we went

1 close to the Adama Sanogo building, Madam Touré, my president, called me and
2 asked me where I was. I told her that I was on my way, and she told me not to
3 advance because it appeared that people were being killed in the RTI. So she told
4 me to call women and tell them not to go out of the commune.

5 Q. [10:13:45] Did she explain to you how she knew that this happened?

6 A. [10:13:50] I did not ask her and she did not tell me. But she's the one who
7 called me to tell me not to advance.

8 Q. [10:14:01] Can you just be a little bit more specific as to where you were located
9 when you received that phone call?

10 A. [10:14:09] I was around the Adama Sanogo building. It is close to Plateau
11 *Dokoui.

12 Q. [10:14:24] Adama Sanogo for us please. Thank you.

13 A. [10:14:35] A-D-A-M-A, S-A-N-O-G-O.

14 Q. [10:14:46] Thank you for that. Now, what did you do after you received that
15 phone call from Maïmouna Touré?

16 A. [10:14:55] Well, I tried to go back home. It was not easy because the security
17 officers were out again and they were shooting indiscriminately. So I had to go
18 through alleys in order to arrive home.

19 Q. [10:15:19] Did you see anything unusual on your way back home?

20 A. [10:15:36] Yes. I saw something in the alley towards Abobo Baoulé, in order to
21 go back home. I saw a body there, a person who had been killed. People were
22 weeping. And then I went on my way.

23 Q. [10:15:54] Can you describe this body that you saw in a little bit more detail?

24 A. [10:16:06] It was a young man who had been killed who was lying down, who
25 had been injured and died.

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1 Q. [10:16:14] How was he dressed?

2 A. [10:16:18] I do not remember. That was seven years ago.

3 Q. [10:16:24] Do you recall whether it was civilian or military clothing?

4 A. [10:16:30] It was -- he was a civilian. He was a civilian.

5 Q. [10:16:36] And did you notice any weapons on or around the body?

6 A. [10:16:42] I did not see any weapons, but I saw some holes. But in the morning
7 before going out of the house, I saw uniformed officers on top of buildings. That is,
8 in the morning, we saw these people stationed on buildings with weapons.

9 Q. [10:17:11] And where did you see these uniformed people, these men?

10 A. [10:17:20] This was around *Sans-Manquer.

11 Q. [10:17:28] Just before we move on again, could you describe the demonstrators
12 on that day. How many were there, approximately, together with you?

13 A. [10:17:44] I really cannot give you an estimate because Abobo is extremely large.
14 I am from Clouetcha. There were people from Clouetcha. So there was a crowd. I
15 cannot estimate the number.

16 Q. [10:18:05] And can you tell us whether these people who were demonstrating
17 were carrying anything with them?

18 A. [10:18:24] Not at all. We were empty handed. The demonstrators were not
19 carrying anything.

20 Q. [10:18:36] Okay. So we'll be changing topic again. And what I would like to
21 do is just to bring you back to Abobo, and let's talk about the periods just after the 16
22 December march at the RTI.

23 PRESIDING JUDGE TARFUSSER: [10:19:11] Maître N'Dry.

24 MR N'DRY: [10:19:12] (Interpretation) Mr President, just to come back to the
25 question put by the Prosecutor. When she talked about demonstrators, by using that

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1 word "demonstrators", I know that the witness was talking about a demonstration
2 that took place throughout Abidjan. When she talks of armed demonstrators, can
3 she be more specific about those demonstrators that the witness is talking about, that
4 is, those who were with her, rather than using that general term "demonstrators",
5 which covered the entire territory.

6 PRESIDING JUDGE TARFUSSER: [10:20:04] Well, I did not understand. I thought
7 about something very specific when we are talking about demonstrators; in this case,
8 I mean, not generically speaking. OTP?

9 MS BERDENNIKOVA: [10:20:21] Your Honours, we can clarify with a question, if
10 you wish.

11 PRESIDING JUDGE TARFUSSER: [10:20:24] Of course. I think there is nothing to
12 be clarified, but let's clarify.

13 MS BERDENNIKOVA: [10:20:28]

14 Q. [10:20:28] Madam Witness, when you mentioned unarmed demonstrators on 16
15 December, were you talking about demonstrators that you yourself saw?

16 A. [10:20:42] When we went out, we were not armed. The demonstrators were
17 not armed. And generally speaking, when you are going to demonstrate, you are
18 going to claim something to express your grievances, and you are not armed. So we
19 were not armed.

20 Q. [10:21:12] Madam Witness, I would like to show you a short video right now, if
21 we could have the floor. It's a public video. And the ERN is CIV-OTP-0032-0039.
22 And just for the record the transcript number is CIV-OTP-0037-0105.

23 THE COURT OFFICER: [10:21:49] The Prosecution has the floor, evidence channel 2.
24 (Viewing of the video excerpt)

25 MS BERDENNIKOVA: [10:22:23]

1 Q. [10:22:24] Madam Witness, can you tell us what this video is?

2 A. [10:22:30] That is the dead body that I saw when I was returning on 16
3 December, on the alley I had taken to go back home. That is the dead body that I
4 saw.

5 Q. [10:22:45] And who filmed this video?

6 A. [10:22:47] I myself; I had my cell phone.

7 Q. [10:22:52] All right. Now let's move on to the next topic that I mentioned
8 before.

9 And we don't need the floor anymore. Thank you.

10 So let's turn back to Abobo in the period after the 16th of December March and, you
11 know, talking also about January and February. Now, first of all, were there any
12 changes in the security situation in Abobo after the march on the RTI?

13 A. [10:23:31] Yes. Everything deteriorated ever since that day, everything
14 deteriorated, particularly during the month of February, when there had to be a rally
15 of the north zone and the south zone.

16 Everything deteriorated in February. A rally was scheduled for the north zone and
17 the south zone. And the north zone includes the communes of Adjamé, Anyama
18 and Abobo. And they had to converge in Abobo for a rally and demand that
19 Mr Gbagbo leave, because he had lost the elections.

20 But very early in the morning that meeting did not take place. The rally did not take
21 place. As usual, people came very early. They were armed. They shot, and they
22 shot indiscriminately. They burned the logistical resources that we had.

23 It was an RHDP march or, rather, an RHDP rally. So I was at the reception. I was
24 part of the reception. So we arrived early, before the militants. And very early as
25 usual, *they started shooting, they set our podiums and tarpaulins on fire. We fled. It

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1 was from that day that everything closed down. Ever since 29 February, the town
2 hall closed down and we didn't work again.

3 Q. [10:25:42] Let's stay on this, on this event, for a little bit. And we'll just go a
4 little bit more slowly through a few of the details that you mentioned.

5 Can you tell us the exact date when this took place?

6 A. [10:25:59] If I remember correctly, it must have been on 29 February.

7 Q. [10:26:13] Madam Witness, I'm afraid there was not 29 days in February that
8 year. Could I suggest the date? Is it possible that it was 19 February?

9 A. [10:26:28] The 19th.

10 MS NAOURI: [10:26:31] (Interpretation) Mr President.

11 PRESIDING JUDGE TARFUSSER: [10:26:34] Where is the problem?

12 MS NAOURI: [10:26:36] (Interpretation) Instead of suggesting the date, the
13 witness had said the 29th, and it would have been appropriate to confront the witness
14 with her prior statement rather than --

15 PRESIDING JUDGE TARFUSSER: [10:26:52] We are talking about a date. Come on.
16 It's not decisive for the trial. Please go ahead.

17 MS BERDENNIKOVA: [10:26:59] Your Honours, if necessary, I can quote the
18 paragraph from the witness's statement with the date.

19 PRESIDING JUDGE TARFUSSER: [10:27:04] You may quote it, yes, please.

20 MS BERDENNIKOVA: [10:27:06] All right.

21 Q. [10:27:08] So, the ERN of the statement, for the record, is CIV-OTP-0032-0011.

22 And I will just quote a portion of paragraph 75, in French: (Interpretation)

23 "On the 19th of February, as the leaders of RDR, we planned two main rallies for
24 Abidjan north and Abidjan south communes."

25 (Speaks English) I don't think it's necessary to quote any more of this portion.

1 Madam Witness, does this refresh your memory on the date of this incident?

2 A. [10:27:57] I beg your pardon?

3 PRESIDING JUDGE TARFUSSER: [10:28:04] She already said it was the 19th, so I
4 think we should go ahead.

5 MS BERDENNIKOVA: [10:28:09]

6 Q. [10:28:10] It's all right. Now, you mentioned armed militants that came and
7 shot. Did you see these militants?

8 A. [10:28:24] I was at the reception, part of the reception committee. Very early in
9 the morning we came to the roundabout. They arrived, and, as usual, they were
10 shooting indiscriminately, and we retreated, and we entered the courtyard of the
11 town hall. And there was an exit behind, and that is where we fled. And they set
12 fire on the logistic resources we had set up.

13 Q. [10:29:03] You mentioned that there were two meetings that were planned for
14 that day, one for north Abidjan and one for south Abidjan. Do you know what
15 happened to the meeting for south Abidjan?

16 A. [10:29:17] No, I don't know. I was not there.

17 Q. [10:29:26] Now, the militants that shot at the mairie roundabout, at the town hall
18 roundabout, were there any victims as a result of this shooting?

19 A. [10:29:47] On that day, I returned home. I was traumatised because I had just
20 escaped death. So I returned home. So I no longer remember whether there were
21 victims or not. I no longer remember.

22 Q. [10:30:15] All right. So what I would like to do is just to bring you back to the
23 same paragraph that I quoted before from your statement. So this is paragraph 75.
24 I will not quote again the same first line that I read out earlier, but I will continue
25 from the second line. So I'll be quoting in French (Interpretation):

1 "The Abidjan north rally had been scheduled at the roundabout close to the Abobo
2 town hall. But while we were organising, we heard gunshots. And we hid in the
3 town hall. The uniformed men killed two people, and we saw the smoke where they
4 burnt our tarps *and all our logistics."

5 Now, Madam Witness, does this refresh your memory as to victims of that incident?

6 A. [10:31:15] Yes. There were bodies. *When there are rallies, people come, you
7 see, we organised that for our supporters. That was seven years ago. Yes, there
8 were deaths, two bodies. But we took refuge in the town hall, and people called us
9 and let us know that two people had been killed. And the town hall has been shut
10 down since then; we weren't able to work.

11 Q. [10:31:48] All right. So you mentioned that the security situation deteriorated
12 in Abobo, and especially after -- or in February 2011. Now, was anything done to
13 counter this deteriorating situation within Abobo itself?

14 A. [10:32:14] Nothing was done. Each day people were being killed. We were at
15 home. Nothing was done to deal with the situation.

16 Q. [10:32:33] And how was security organised in Abobo at this time?

17 A. [10:32:42] The people who were supposed to ensure our security were the ones
18 who were killing us. So there was no security.

19 Q. [10:32:54] Were any groups organised to counter the situation?

20 A. [10:33:07] I'm not aware of any groups. The groups who were there were to
21 kill us. Well, there was the Young Patriots, the LMP, the GPP; they were the ones
22 who were killing us.

23 Q. [10:33:28] Were there any resistance groups that were created to fight against the
24 security forces?

25 PRESIDING JUDGE TARFUSSER: [10:33:42] Maître Zokou.

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1 MR ZOKOU: [10:33:45] (Interpretation) Your Honour, I think that the Prosecution
2 is well aware that this expression "resistance group" has certain connotations and
3 really is not appropriate.

4 PRESIDING JUDGE TARFUSSER: [10:34:03] Well, I don't know why it shouldn't be
5 appropriate, I must say. It's resistance against something. Please, Madam
6 Prosecutor, go ahead, please.

7 MS BERDENNIKOVA: [10:34:18]

8 Q. [10:34:22] So, Madam Witness, shall I repeat my question for you?

9 A. [10:34:27] Yes, Counsel, if you could.

10 Q. [10:34:29] Were any groups created to defend the communities in Abobo at this
11 time?

12 A. [10:34:37] Oh, yes. Some groups were set up to defend the community in the
13 PK18 area. Each day people were being killed there. And it would appear that
14 some young people formed groups to ensure the security of their neighbourhoods.
15 But I wasn't there. I live in Clouetcha, and that's a bit of a distance from PK18.

16 Q. [10:35:16] All right. We understand that you were not present there, but do
17 you know generally what the purpose of these groups was?

18 A. [10:35:24] Well, if you're being killed, you're not going to stand there and do
19 nothing. They were trying to defend themselves. That was the goal.

20 Q. [10:35:42] And can you be more specific as to --

21 MR N'DRY: [10:35:46] Monsieur le Président.

22 PRESIDING JUDGE TARFUSSER: [10:35:48] It is clear what the groups do. If
23 they are here, the resistance group, they are created. Of course they have -- I mean,
24 there is a little bit of logic which probably supports us. Okay.
25 So, just go ahead, but we know what they are doing.

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1 MS BERDENNIKOVA: [10:36:05]

2 Q. [10:36:08] All right. Can you be a little bit more specific as to the time frame
3 when the groups were created?

4 A. [10:36:17] I don't really remember the time frame. *I know that the resistance
5 began in the PK18 neighbourhood before spreading to the entire commune. But I
6 don't really remember the specific date.

7 Q. [10:36:41] And do you know the name for any of these groups?

8 A. [10:36:48] Could you repeat?

9 MR N'DRY: [10:37:03] (Interpretation) Your Honour.

10 PRESIDING JUDGE TARFUSSER: [10:37:05] Maître N'Dry.

11 MR N'DRY: [10:37:08] (Interpretation) Your Honour, I think that the method that
12 the OTP is using is not in keeping with -- well, I think we should allow the witness to
13 provide her account of the events. We can't suggest expected responses to the
14 witness. I think we've all seen and heard what has been done. The witness has said
15 she doesn't know about these groups. She was living in Clouetcha and she didn't
16 know these groups.

17 The Prosecutor has jumped upon this particular response and is advancing -- I don't
18 know quite why, but I think she wants to hear something from the witness.

19 I think this is very important, your Honour. The witness must be allowed the
20 opportunity to provide her own account by responding to questions. But the
21 Prosecution should not be suggesting responses to the witness.

22 PRESIDING JUDGE TARFUSSER: [10:38:17] Now, the witness responded there
23 are -- these have been created to defend themselves. Now the question is, do you
24 know the name of one of those groups. Now, and that's it.

25 Please go ahead. Go ahead with the questioning. But if there is something to

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1 confront with the witness, do it, instead of trying to elicit answers you are expecting.

2 Just confront it, confront her with the statement.

3 MS BERDENNIKOVA: [10:38:52] Thank you, your Honours. For the moment there
4 is nothing really to confront. But we are just trying to elicit a little bit more
5 information using open questions. That's all that we're trying to do.

6 Q. [10:39:07] So, Madam Witness, do you know the names of any of the groups?

7 A. [10:39:13] The groups were, well, there were several groups.

8 PRESIDING JUDGE TARFUSSER: [10:39:25] But the question was, do you know the
9 names of those, one of those several groups? This was the question.

10 THE WITNESS: [10:39:35] (Interpretation) There was one group led by Toumc,
11 Toumc. There were several groups.

12 PRESIDING JUDGE TARFUSSER: [10:39:56] Did these groups have names or not?
13 Do you know any of these names? How did they call themselves, if you know?

14 THE WITNESS: [10:40:06] (Interpretation) They had names, but I've forgotten the
15 names, your Honour.

16 PRESIDING JUDGE TARFUSSER: [10:40:09] We have it. They had names but the
17 witness had forgotten them.

18 MS BERDENNIKOVA: [10:40:19]

19 Q. [10:40:20] Now, just going back on the time frame, can you tell us if the
20 group -- if these groups were created before or after the RTI march?

21 A. [10:40:33] I don't know.

22 Q. [10:40:43] And now, to your knowledge, were any political parties in control of
23 these groups?

24 A. [10:40:54] I don't know.

25 MS BERDENNIKOVA: [10:41:03] Your Honours, I'd like to go into a very brief

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1 private session just to cover, I think, two questions.

2 PRESIDING JUDGE TARFUSSER: [10:41:10] Let's go into private session, please.

3 (Private session at 10.41 a.m.)

4 (Redacted)

5 (Redacted)

6 (Redacted)

7 (Redacted)

8 (Redacted)

9 (Redacted)

10 (Redacted)

11 (Redacted)

12 (Redacted)

13 (Redacted)

14 (Redacted)

15 (Redacted)

16 (Redacted)

17 (Redacted)

18 (Redacted)

19 (Redacted)

20 (Redacted)

21 (Redacted)

22 (Redacted)

23 (Redacted)

24 (Redacted)

25 (Redacted)

1 (Open session at 10.43 a.m.)

2 THE COURT OFFICER: [10:43:32] We are back in open session, Mr President.

3 PRESIDING JUDGE TARFUSSER: [10:43:37] Madam Berdennikova.

4 MS BERDENNIKOVA: [10:43:45]

5 Q. [10:43:47] All right. So we're going to change topic one more time, and what I
6 would like to talk about now is the women's demonstration in Abobo.

7 So we will go into more details of the day itself, but before we get there, can you just
8 let us know what your role was in this march.

9 A. [10:44:13] On the 2nd, I had been called again by Ms Touré, the president, since
10 throughout the entire commune women were demonstrating to tell Mr
11 Laurent Gbagbo to step down. He had lost the election. And she called me to ask
12 me my opinion, whether the women of Abobo should go out and demonstrate. And
13 I said I didn't see any problem with that, but I suggested she call other women to get
14 their opinion.

15 And so she called some other women, and all the women wanted to go out and
16 demonstrate as well. So, you see, as usual, well, I'm the secretary, and I also
17 organise and mobilise the women. And so she told me to start the mobilisation, to
18 call the women since it was an organised march, organised by the RHDP. And I
19 called Mrs Coulibaly Cécile,*the president of PDCI women, and I called Ms Koné
20 Assetou, the president of the Amazons; and I called Mrs Habiba Camara, the
21 president of the MFA women's group; and I called Ms Bleu (phon), the president of
22 another women's group. She was not able to answer.

23 And so it was Mrs Guéï Yvette *who came on behalf of IDPCI women. Thus there
24 was Kourouma Fanta. She was supposed to handle the women from civil society,
25 from the NGOs and also women from religious groups.

1 Q. [10:46:13] Now, generally speaking, what was the purpose of this march?

2 A. [10:46:18] The purpose of the march was to get Gbagbo to clear out. He had
3 lost the election. It was to tell him to leave. And you see, too many people had
4 died. Our children, our husbands had been killed. So the message was for him to
5 clear out. He had lost the election.

6 Q. [10:46:43] And why was it a women's march?

7 A. [10:46:45] Well, the men could not go out anymore. There was all kinds of
8 shooting here and there and everywhere, indiscriminate shooting. And you see, we
9 women, we women, they were not going to fire upon us. We were women. They
10 would not fire upon us.

11 Q. [10:47:10] All right. And can you tell us about what kind of activities were
12 done in preparation for this march by yourself and the others who were organising
13 this?

14 A. [10:47:23] As I was telling you, I called these women and each one was
15 supposed to call her people. These women I was calling, they were also mobilising
16 others. And they were supposed to call others. We had signs. There was a
17 resolution that was going to be read out as well that day by myself.

18 Q. [10:47:59] And approximately when were these preparations being made?

19 A. [10:48:06] It was the day before. That's when we prepared the demonstration.
20 It was on the 2nd. That is when we organised the events. Usually it's the day
21 before. That's when we call people and start mobilising people and putting
22 everything in place before the day of the march itself.

23 Q. [10:48:35] Can you tell us how were people notified, how were they informed
24 that the march was going to take place?

25 A. [10:48:44] Telephone calls. We called out to our various people, and then also

1 by word of mouth. Some women would go to the markets and let others know and
2 tell the women that there was going to be a march.

3 Q. [10:49:07] Can you tell us what was the intended itinerary for that march?

4 A. [10:49:13] From the Banco round point about to the town hall of Abobo.

5 Q. [10:49:21] All right. So let's move on to the day of the actual march. So where
6 were you on the morning of 3 March 2011?

7 A. [10:49:38] In the morning of 3 March, well, you see, the signs had to be
8 distributed to the women. My son was with me, and we left the house and we went
9 towards the Banco roundabout.

10 Q. [10:50:03] Can you recall approximately what time this was that you arrived at
11 the Banco roundabout?

12 A. [10:50:10] Around 7 in the morning already I was there. I got there before, in
13 advance. And there were two women already there. They were already there at
14 the roundabout. And I met up with them there. Koné Assetou and Fanta
15 Kourouma.

16 Q. [10:50:32] Were you carrying anything with you that day?

17 A. [10:50:37] No, I didn't have anything. I just had -- well, my son was with me.
18 I had a megaphone. I brought that, a megaphone. My son was carrying the signs,
19 but I didn't have anything other than that. And then the resolution that I was going
20 to read out, I had that with me as well.

21 Q. [10:51:04] You mentioned that you had a megaphone. Did anyone else have a
22 megaphone?

23 A. [10:51:11] Yes.

24 Q. [10:51:16] Do you recall how many people would have had a megaphone that
25 day?

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1 A. [10:51:24] I don't remember.

2 MS BERDENNIKOVA: [10:51:29] Your Honours, we'd like to play a short video now
3 for the witness. For the record, it's CIV-OTP-0077-0411. If we could have the floor,
4 please. So while it's being set up, the transcript number is CIV-OTP-0021-0104.

5 THE COURT OFFICER: [10:51:59] And the Prosecution has the floor, evidence
6 channel 2.

7 MS BERDENNIKOVA: [10:52:02] Thank you. We will just play timestamp from
8 the beginning until second 44.

9 THE COURT OFFICER: [10:52:10] And it's a public video, I guess?

10 MS BERDENNIKOVA: [10:52:14] Yes.

11 (Viewing of the video excerpt)

12 THE INTERPRETER: [10:52:35] Sight translation (Interpretation): "The crowd is
13 chanting, ADO, ADO, ADO."

14 MS BERDENNIKOVA: [10:53:04]

15 Q. [10:53:05] Madam Witness, have you seen this footage before?

16 A. [10:53:11] Yes.

17 Q. [10:53:13] And can you tell us what it is, what it shows?

18 A. [10:53:19] As I told you, there was a flag, a flag of Côte d'Ivoire, orange, white
19 and green, and the women had acacia leaves and signs, as I was telling you, and
20 various signs. We had written things on some of the signs. Some of the women
21 had whistles as well.

22 Q. [10:53:47] So the footage that we've seen is the footage of the march, I
23 understand. I'm afraid you have to answer, because otherwise the transcript will not
24 catch.

25 A. [10:54:05] I don't hear.

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1 Q. [10:54:06] I understand that that video is of the women's march in Abobo?

2 A. [10:54:14] It was before the march. You see, we weren't able to march. It was
3 before. The women were -- well, you could see the atmosphere. That was the day I
4 was at the march.

5 Q. [10:54:31] We will show you another very short portion of this video.

6 And just for the record, it's from minute 02.10 until 02.22. All right. We'll play it
7 from 2.05 until 2.22.

8 (Viewing of the video excerpt)

9 MS BERDENNIKOVA: [10:55:32]

10 Q. [10:55:32] Madam Witness, we just stopped at minute 02.19. Do you recognise
11 the person on your screen?

12 A. [10:55:44] Yes. Koné Assetou; that's her name, the president of the Amazons.

13 Q. [10:55:50] Thank you. And we will be sending a screen shot shortly.

14 Now, without necessarily giving all the specific names, can you tell us if you saw
15 anyone filming the march when you were there?

16 A. [10:56:22] Yes, I was the one who had the cameraman come. Mr Souleymane
17 was his name.

18 Q. [10:56:29] Did you see anyone else with cameras that day?

19 A. [10:56:34] Yes. There was another young fellow, Idriss was his name. He too
20 had a camera. The name was Diarassouba Idriss.

21 MS BERDENNIKOVA: [10:56:54] We don't need the floor anymore.

22 Q. [10:56:58] So, Madam Witness, let's now talk about the demonstrators on that
23 day. Can you describe a little bit the participants of the march?

24 A. [10:57:07] As I told you, it was a women's march, RHDP women. So there were
25 political women, women from civil society, from NGOs, and even women from

1 religious communities. They too were part of the march.

2 Q. [10:57:32] And approximately how many people were there?

3 A. [10:57:36] Thousands, thousands of women, a great many women.

4 Q. [10:57:44] Were there any men taking part in the march?

5 A. [10:57:50] Well, other than -- I was surrounded by various people. *Our
6 departmental leader was there, Mr Yéo Kolotioloma. There was one journalist from
7 TCI. There was a photographer from Le Patriotes newspaper, Mesmer was his name,
8 and then the cameraman, and his name was Mr Souleymane. And then there was
9 one other person there, Mr Diarassouba Idriss.

10 Q. [10:58:28] And the demonstrators who were there, were they carrying anything?

11 A. [10:58:30] No. Some -- well, the president of the Amazons, *she had bought a
12 white pagne to cut out white headbands, most women had white headbands. Well,
13 some of them had leaves, some had écumoires (phon).

14 Q. [10:59:02] Did you see anyone with weapons?

15 A. [10:59:07] No, not at all, not at all.

16 Q. [10:59:11] So can you just situate us a little bit. Where exactly were the
17 demonstrators? I mean, how were they positioned?

18 A. [10:59:28] The women were positioned at the roundabout, and there were a
19 great many of them. So they were at the roundabout and they were facing the town
20 hall. Myself, I was facing the other way. I had my back to the town hall because,
21 you see, I was facing the group of women, and they were -- they were facing the town
22 hall. I was facing them.

23 Q. [11:00:01] So what happened next?

24 A. [11:00:06] Well, in the morning, *we were there, the atmosphere was such, and the
25 women were in a hurry to leave, to take the route to the place where the motion was to be

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1 read. We wanted to -- I was facing them -- correction, they were facing the town hall, and I
2 had my back to the town hall. That was at around 9 -- or 9 or 10 in the morning.
3 And all of a sudden -- I had a megaphone, you see. And I saw the women clapping. And
4 when I saw the women clapping, that drew the -- *well, they were looking to their left, it was
5 at my right, and that drew my attention. And I saw some women clapping. And when I
6 looked to my right, I saw a tank approaching. And on the tank there was a white flag. And
7 because, you see, because the women had seen the white flag, they were clapping. They
8 thought that perhaps people were coming to ensure safety at the march.
9 Then after that there was a military truck, a cargo truck. And to our great surprise, a
10 few seconds after they went by, we heard firing, shells being fired. Boom. I heard two
11 shots.

12 MS BERDENNIKOVA: [11:02:00] Your Honours, I think we can take the break.

13 PRESIDING JUDGE TARFUSSER: [11:02:02] We can stop. We can break now.

14 Madam Witness, we break now so you can recover. We break for half an hour and
15 we will come back at 11.30. Thank you very much. The hearing is adjourned.

16 THE COURT USHER: [11:02:27] All rise.

17 (Recess taken at 11.02 a.m.)

18 (Upon resuming in open session at 11.35 a.m.)

19 THE COURT USHER: [11:35:12] All rise.

20 Please be seated.

21 PRESIDING JUDGE TARFUSSER: [11:35:31] Madam Witness, hello. How do you
22 feel?

23 THE WITNESS: [11:35:51] (Interpretation) I'm a little bit better, your Honour.

24 PRESIDING JUDGE TARFUSSER: [11:35:55] Can you continue? Are you ready to
25 continue?

1 THE WITNESS: [11:35:59] (Interpretation) Yes, yes, your Honour.

2 PRESIDING JUDGE TARFUSSER: [11:36:02] So if you have some problems, some
3 troubles, just tell me, okay?

4 THE WITNESS: [11:36:13] (Interpretation) Very well, your Honour.

5 PRESIDING JUDGE TARFUSSER: [11:36:16] Okay. So I give back the floor to the
6 Office of the Prosecutor. The floor is yours.

7 MS BERDENNIKOVA: [11:36:22] Thank you.

8 Q. [11:36:23] Now, I understand these are very difficult things to talk about,
9 Madam Witness. So as the Presiding Judge just mentioned, if ever you need a break
10 or anything at all, just let us know, all right? We'll take it slowly and go step by step,
11 okay?

12 So we stopped before the break on the two shots that you heard. Can you tell us
13 what happened next to you?

14 A. [11:37:00] When I heard the two shots, it was total chaos. Everybody was
15 fleeing in all directions. We did not know where the fire was coming from, and I fell
16 on the tarred road. Then I stood up. Everyone was trying to find shelter
17 somewhere.

18 So from the Banco roundabout right up to la pharmacie Providence, all the shops
19 were closed, so there was one courtyard with an entrance. And the majority of
20 women -- because when the shots were fired, the women dispersed. Some went in
21 the direction of Anador neighbourhood; others towards Derrière Rails. And those of
22 us who were close to the building, there was a single entrance, and that is where all
23 the women wanted to go in. And I fell down there once again. And I lost
24 consciousness. And then a few seconds or minutes afterwards I recovered
25 consciousness, and I heard the women crying (Speaks Malinké) "they have killed the

1 women." They were shouting this in Malinké: "Oh, God, they have killed the
2 women."

3 I did not initially know that the women had died. I wanted to go, and people held
4 me back and said, "Do not go there. It is not something to see."

5 And when there were these shots, people came out from almost everywhere. Young
6 people arrived to try to assist us. The young people organised themselves on the
7 spot. On that spot there were six women dead right there, including Bamba
8 Nachamy. Then there was her uncle, Bamba Moussa, and they came and took their
9 daughter using pushcarts that we refer to as wotros. So they took their daughter
10 home. For the five other bodies, there was a group *of youths from the north led by
11 Mr Tioté. They sent the bodies to the general hospital of Abobo south.

12 It was afterwards that a woman called Ouattara Awa called me to say that she was
13 also with a woman at the march, and that woman had died as a result of her injuries.
14 So in total that made seven women killed.

15 Q. [11:40:44] Madam Witness, we'll just go a little bit more slowly through some of
16 the details of what you have just explained. So you mentioned that you fell after the
17 shots when you were still at the crime scene. What did you see immediately at the
18 Banco roundabout?

19 A. [11:41:10] Apart from the tank that I saw and the truck, I did not see any other
20 uniformed officers. I did not see any other armed persons. It was the tank and the
21 truck that I saw.

22 Q. [11:41:35] Let me just clarify my question. I realise it was not maybe very clear.
23 After the shots and after the vehicles left and before you left Banco roundabout, what
24 did you see around you?

25 A. [11:41:52] It is when I fell down and I got up again, in fact, I fell down twice.

1 The second time I lost consciousness. We entered a courtyard and I found Koné
2 Assetou as well as the president of the women's wing of the PDCI. It was total chaos.
3 Everyone was traumatised and each of them was trying to return back to their various
4 homes.

5 Q. [11:42:32] Did you see if anyone was injured?

6 A. [11:42:36] Yes. There were many women injured. I myself, I was injured.
7 Many.

8 Q. [11:42:49] And what did you do when you went to seek refuge and you saw
9 Assetou, Assetou Koné?

10 A. [11:43:00] There was Assetou Koné and the president of the women's wing of
11 the PDCI. Then we called our leadership in the Golf. Madam Touré called me and
12 said she had heard that women were killed, and she asked me which were the women.
13 And I told her that apart from Bamba Nachamy, I did not know about the five others.

14 Q. [11:43:36] Madam Witness, we'll talk a little bit more about these victims in a
15 moment. Just before we get there, you mentioned that you were injured. Can you
16 specify what type of injuries you yourself sustained?

17 A. [11:43:48] I fell on my knee and my elbow. So I was wounded on my elbow,
18 and my knee was swollen because I had fallen on the tar.

19 Q. [11:44:05] And did you seek any medical assistance for these injuries?

20 A. [11:44:09] Yes, obviously. I went to the hospital. After having called our
21 leaders, the bodies were sent to the hospital. There was a back exit from the
22 courtyard and I went out there. Fortunately, there, I saw a man who had a vehicle.
23 *I was covered in blood and he carried me to a place not far from my home, and I
24 went to the Clouetcha hospital. That is where I received treatment.

25 Q. [11:44:45] What did you see when you were at the hospital?

1 A. [11:44:49] There were other injured people at the Clouetcha hospital and I met
2 them there.

3 Q. [11:44:56] And do you know whether these people were injured during the
4 march?

5 A. [11:45:03] Yes. It was during the march.

6 Q. [11:45:09] Can you specify the type of injuries these people had?

7 A. [11:45:19] Most of them had been struck by bullets.

8 Q. [11:45:28] Now, Madam Witness, let's go back to the victims of this march.

9 You mentioned that on the day you only knew about the death of Bamba Nachamy.
10 Did you find out who the other victims who died were after the incident?

11 A. [11:45:48] Yes, indeed. From the hospital -- as I have told you, Abobo is
12 divided into 24 subdistricts or neighbourhoods. I called the 24 leaders, because the
13 majority had been at the march with us, and I called them to know which were the
14 women who had died.

15 In the meantime, Madam Ouattara Awa said that there was an Amy Coulibaly who
16 had died, and then there was Koné Mariam, who lives in the same neighbourhood as
17 myself, Clouetcha.

18 Then there was the leader of the district of Agbekoi, who told me that two women
19 from there had died also, Touré Adjara and Coulibaly Fatoumata. Fanta Kourouma
20 also called me to say that there was Sylla Malon who died. And I really no longer
21 remember who called me to say Ouattara Gnon Rokia had also died. I don't know
22 whether they were living in the PK or wherever. *They had come to the
23 Sagbé-Céleste and Sagbé-Centre neighbourhood, Derrière Rails, and her family was
24 there. So I did everything to make contact with the families of those victims.

25 Q. [11:47:36] Did you visit these families?

1 A. [11:47:42] Yes, I visited those families.

2 Q. [11:47:45] When approximately did you see them?

3 A. [11:47:50] I do not remember whether it was two days afterwards. I no longer
4 remember the date, but I visited them.

5 Q. [11:48:05] All right. And to your knowledge, did these families receive any
6 compensation?

7 A. [11:48:14] I really do not understand what you mean.

8 Q. [11:48:22] I'm going to repeat my question. To your own knowledge, do you
9 know whether the members of the families of these seven victims, did they receive
10 any kind of compensation?

11 A. [11:48:34] Yes, they received something.

12 Q. [11:48:42] Did this include financial compensation?

13 A. [11:48:45] When the events happened, I went and looked at the location and I
14 visited them. Our leaders who were at the Golf sent me someone who gave me
15 some money to give to them.

16 Q. [11:49:23] All right. Let's now turn to some of the victims that were injured on
17 that day. Can you provide any specific examples of people who were injured?

18 A. [11:49:43] There was an Amazon, Amy Ouattara; her right hand was injured.
19 There was another one who was pregnant who was struck in the back. There were
20 many, many of them who had been struck *in the back by bullets.

21 Q. [11:50:13] And did you also visit these injured victims or their families?

22 A. [11:50:20] Well, not all of them, but some of them.

23 Q. [11:50:28] Now, Madam Witness, did you see any videos of this march on the
24 media?

25 A. [11:50:41] It was the following day, Souleymane, the cameraman that I had

1 commissioned, he handed me the cassettes and I watched them.

2 Q. [11:51:01] And aside from that video, did you see this incident being reported in
3 the news?

4 A. [11:51:09] The television news? Well, at that time we were not watching the
5 RTI. We had our own channel, which was the TCI. They showed a few clips.

6 Q. [11:51:37] Now, Madam Witness, you just mentioned a man named Souleymane
7 who filmed the demonstration. Did you see other people filming the demonstration,
8 aside from the ones that you already mentioned?

9 A. [11:52:02] Yes. I told you that there was a young man, Diarassouba Idriss, who
10 also filmed the event. But I did not see his footage. It was Souleymane's film that I
11 saw.

12 Q. [11:52:20] During the march itself, did you see other people with cameras?

13 A. [11:52:28] Yes. Well, since there were many people, I couldn't see every one,
14 *but I saw two cameramen. But in the building where we were, there was a certain
15 Oussa Sangaré who was an imam. He was looking down and he was also filming.

16 Q. [11:52:58] Now, Madam Witness, do you know how the 3 March demonstration
17 was reported by the RTI?

18 A. [11:53:10] *It was only afterwards that I heard people. But I didn't look because
19 I did not have the courage to watch the RTI.

20 It is people who told me that they had shown footage showing that this was a
21 montage, that people were saying, lie down there and that you should be filmed. It
22 was serious. They said it was bisap, or sheep blood.

23 Q. [11:54:00] I might be mistaken, but I believe you just said something not in
24 French. Did you just say something in another language?

25 A. [11:54:06] Yes. They said in Dioula that: Do not stand up. The acting is not

1 finished; that it was a montage. They were just -- it was just playing a role.

2 PRESIDING JUDGE TARFUSSER: [11:54:36] Excuse me, Madam Witness. You
3 said, "I had not the courage to watch the RTI", page 47, line 21 of the English
4 transcript. What does it mean that you haven't had the courage to watch the RTI?
5 Do you need courage to watch the RTI?

6 THE WITNESS: [11:54:58] (Interpretation) Well, during that period, everything
7 that the RTI showed was not good for us. It was the absolute opposite that they
8 were showing. So quite frankly, I did not watch that station because when I saw the
9 images that they showed, it made me cry. It made me distressed. So I no longer
10 watch the RTI. I was watching the TCI channel.

11 PRESIDING JUDGE TARFUSSER: [11:55:34] Now I understand better. Thank you.

12 MS BERDENNIKOVA: [11:55:38] Your Honours, it was just drawn to my attention
13 that one of the answers that the witness provided earlier wasn't captured, it seems, in
14 the transcript. It was going back to the various cameramen that the witness may
15 have seen during the march.

16 PRESIDING JUDGE TARFUSSER: [11:56:01] So ask again the question.

17 MS BERDENNIKOVA: [11:56:03] All right.

18 Q. [11:56:03] Madam Witness, a few moments ago I asked you whether you saw
19 anyone else aside from Souleymane, yes, and Idriss Diarassouba, who would have
20 been filming the march. And I'm afraid your answer was just not registered
21 completely. Can you repeat it again, please?

22 A. [11:56:27] I said on the spot itself, there was Mr Diarassouba Idriss and
23 Souleymane. But since there was a building there, it was afterwards. I know the
24 imam. He told me -- his name is Oussa (phon) Sangaré. He said that he had also
25 filmed the scene, but I did not see his footage. He was in the building. Otherwise,

1 on the spot, it was Mr Diarassouba and Mr Souleymane who were with us.

2 Q. [11:57:12] I would just like to very briefly quote a small portion of paragraph 85
3 of your prior statement. I'll quote it in French. It's third line from the bottom, and
4 it says: (Interpretation)

5 "I saw three other people who had cameras at the march, but I do not know who they
6 were."

7 (Speaks English) Is that true? Does that refresh your memory?

8 A. [11:57:40] Three people? I no longer remember.

9 Q. [11:57:53] All right. Now, Madam Witness, I would like to move on from the 3
10 March incident, and I would like to talk to you now about the shelling of the Siaka
11 Koné market. Now, do you remember, first, on which date this incident took place?

12 A. [11:58:17] I do not remember the precise date. But it was my cousin who called
13 me to say that the Siaka Koné market had been shelled. On that day 40 people died.

14 Q. [11:58:43] Where were you when you received these phone calls, this phone
15 call?

16 A. [11:58:51] I was at home in my house.

17 Q. [11:59:00] Just to situate you a little bit with regards to the date, I'd like to quote
18 paragraph 116 from your statement. And again I quote in French (Interpretation):
19 "On 17 March 2011, between 2 p.m. and 3 p.m., I was at home."

20 (Speaks English) Does that refresh your memory as to the date of when this
21 happened?

22 A. [11:59:33] Yes. It was indeed on 17 March because this was after the death of
23 the seven women killed that the events of the Siaka Koné market took place.

24 Q. [11:59:54] Before you received the phone call that you just mentioned, did you
25 yourself hear anything?

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1 A. [11:59:59] I beg your pardon?

2 Q. [12:00:07] You mentioned a phone call that you received on that day. Before
3 you received that phone call, talking about the events, did you yourself hear
4 anything?

5 A. [12:00:22] No. All we heard was the shells dropping. You could hear that
6 even from a distance. On that day in Abobo, everyone could hear it.

7 Q. [12:00:39] Do you remember about what time of day it was that you heard these
8 shells?

9 A. [12:00:46] It was in the afternoon.

10 Q. [12:00:55] Now, aside from the phone call that you already mentioned, did you
11 receive any other calls about this incident?

12 A. [12:01:17] Yes. Madam Awa Ouattara also called me and told me that one of
13 their neighbours had -- *she said one of her neighbours from Sagbé-Celeste had been
14 killed, that people had been killed, people from her neighbourhood.

15 Q. [12:01:42] And can you give us more details of the information you received
16 when your cousin called you?

17 A. [12:01:48] In relation to the Siaka Koné market? If you wish. I already stated that
18 some 40 people were killed on that day. *Many people died in Abobo on that day.

19 PRESIDING JUDGE TARFUSSER: [12:02:10] The question was: What did your
20 cousin tell you on the telephone when she called you?

21 THE WITNESS: [12:02:15] (Interpretation) My cousin, whose name is Mariam
22 Keita, called me and told me that there was shelling at the Siaka Koné market and
23 that several people had been killed.

24 MS BERDENNIKOVA: [12:02:31]

25 Q. [12:02:33] Where does this cousin live; where did she live?

1 A. [12:02:36] She lived a few metres away from the Siaka Koné market.

2 Q. [12:02:41] All right. And what did you do next after receiving these phone
3 calls?

4 A. [12:02:56] On that day, that was the most difficult day for me. My morale was
5 very low. I called Madam Touré Aya Virginie; they were at the Golf, and I told her
6 that if people did not do something, Gbagbo's people would finish off everybody in
7 Abobo, that when they would come back, all they would find would be corpses. My
8 morale was really very low. And I said that if they didn't do anything, then we
9 would have to come out and say leave Gbagbo alone because, you see, on each
10 blessed day of the Lord, people were being killed, so our morale was totally gone.

11 Q. [12:03:41] Now, Madam Witness, you mentioned earlier that there were 40
12 victims as a result of the shelling on 17 March. Can you tell us how you know about
13 that number of 40 victims?

14 A. [12:03:58] I told you that there was an organisation -- because I didn't go out
15 myself, but a committee had been set up during the post-election crisis. And I was
16 the only woman. We set up a committee, and so whenever there were any deaths,
17 people would call us and provide us with the information, and I was the only female
18 member of that committee. People would call us and inform us.

19 Q. [12:04:27] Can you just give us the full name of this committee.

20 A. [12:04:33] It was called comité de *survie des victimes, committee to follow up
21 or monitor victims.

22 Q. [12:04:42] All right. We will come back to this a little bit later, but for now, I
23 would like to ask you, were there any other shelling in Abobo before or after 17
24 March shelling?

25 A. [12:05:00] Yes, yes, there was a lot of shelling. Each blessed day there was

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1 shelling. In the morning, for "good morning", there was shelling. In the evening,
2 there was shelling. In the afternoon, shells were dropping here and there. So that's
3 what we got for "good morning", so to speak.

4 Q. [12:05:31] Can you give a more specific time frame as to these shelling, what
5 months we're talking about?

6 A. [12:05:38] Well, it all happened after 19 February, after 19 February; 19 March all
7 the way to April.

8 Q. [12:06:09] And can you give any specific examples of specific shellings that you
9 may recall?

10 A. [12:06:17] Well, in our neighbourhood shells were dropped. Fortunately the
11 inhabitants had left. Abobo was almost empty. People had left. The town of
12 Abobo was almost empty. There was a shell that dropped in Clouetcha, my own
13 neighbourhood.

14 Q. [12:06:49] Do you recall, do you know the names of any of the victims who
15 would have died as a result of these shellings?

16 A. [12:07:00] Yes. I can remember Touré Siaka, my neighbour's son, who also died.

17 Q. [12:07:17] Did you yourself witness any of the other shellings?

18 A. [12:07:24] Yes. We had gone to get some foodstuff at PK18 neighbourhood
19 since food had become rare. So we had to go get some supplies at PK18. And I was
20 in the company of Diarassouba Idriss, who was accompanying me. And just when
21 we were parking, there was an explosion of a shell in PK18 and people were killed
22 *in Mr Ouattara Sitafa's district, in PK18.

23 Q. [12:08:07] Did you see the bodies of these victims?

24 A. [12:08:11] I didn't go close enough.

25 THE INTERPRETER: [12:08:18] The witness simply whispers, Mr President. We

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1 didn't get the last part of what she said.

2 PRESIDING JUDGE TARFUSSER: [12:08:23] Madam Witness, could you please
3 speak a little bit louder, because otherwise the interpreters don't catch what you are
4 saying.

5 And to the Prosecutor, would you wait, please. Would you listen to me first. I'm
6 speaking to you, no, I'm speaking to you. You always start questioning before the
7 interpreter has finished, so we don't have it on the record, the first part of your
8 questions. So just wait a second. Thank you.

9 MS BERDENNIKOVA: [12:08:56] I'll be more careful.

10 Q. [12:08:59] Madam Witness, just when talking about the shell that fell at PK18,
11 you mentioned that people were killed. Do you know how many and who these
12 people are?

13 A. [12:09:20] No, I don't remember the number. But people died. I was
14 supposed to meet Mr Ouattara Sitafa, the district official, to get some foodstuffs from
15 him, *and this incident happened in our presence and people died. But I don't
16 remember the number.

17 Q. [12:09:50] I will just read a portion of your statement dealing with that exact
18 incident. And it's at paragraph 76 from line 3. I will quote in French:

19 (Interpretation)

20 "I and my colleagues went to PK18 to get some foodstuff when a shell exploded not
21 far away from our vehicle and killed two children."

22 (Speaks English) Does that refresh your memory? Madam Witness, can you just
23 repeat your answer for the record, as it wasn't registered clearly.

24 A. [12:10:48] Can you repeat your question please, Counsel.

25 Q. [12:10:59] In the portion of the statement that I just read out, it says that the

1 victims were -- of that incident -- were two children. Is that true?

2 A. [12:11:12] Yes, indeed, it was two children.

3 Q. [12:11:23] All right. So I would now like to cover my last topic with you today,
4 and for that I would like to go back to the comité de *survie that you have just
5 mentioned a few moments ago. Now, can you explain to us briefly how this
6 committee was established, how it was created?

7 A. [12:11:50] It was after the events of February, *19 February, that I set up a
8 committee which was also under the authority of Mr Yéo *Kolotioloma and Mr Dosso
9 Mamadou, and we often met at his residence. There was Sidibé Daouda, Sylla
10 Aboubakary and myself. These were the members of the committee.

11 Q. [12:12:33] And what was the purpose of this committee?

12 A. [12:12:40] I have already told you that it dealt with the victims. It followed up
13 victims. I was part of the mayor's office, so it was our duty to issue certificates of
14 internment. Dosso Mamadou was also someone from the mayor's office. So we
15 had a book in which we recorded the deaths and we noted how the burials were
16 carried out.

17 Q. [12:13:08] Now, you mentioned that details of victims were collected by this
18 committee. Was there a list, some kind of a list drawn up of victims?

19 A. [12:13:26] Yes, there was a list.

20 Q. [12:13:38] And who worked on compiling this list?

21 A. [12:13:44] It was after the post-election crisis that I proceeded to identify all the
22 victims of the post-election crisis in Abobo. I was assisted in that task by some
23 Amazons, three -- four girls, rather, assisted me.

24 MS BERDENNIKOVA: [12:14:10] Your Honours, could we briefly go into private
25 session just for specific identities.

1 PRESIDING JUDGE TARFUSSER: [12:14:15] Let's go into private session, please.

2 (Private session at 12.14 p.m.)

3 (Redacted)

4 (Redacted)

5 (Redacted)

6 (Redacted)

7 (Redacted)

8 (Redacted)

9 (Redacted)

10 (Redacted)

11 (Redacted)

12 (Redacted)

13 (Redacted)

14 (Open session at 12.15 p.m.)

15 THE COURT OFFICER: [12:15:33] We are back to open session, Mr President.

16 PRESIDING JUDGE TARFUSSER: [12:15:36] Yes, please, Madam Prosecutor.

17 MS BERDENNIKOVA: [12:15:38]

18 Q. [12:15:41] Now approximately how long did it take you to put this list together?

19 A. [12:15:49] It took quite some time, but I don't remember how long.

20 Q. [12:16:03] And where was this work done?

21 A. [12:16:12] At the Abobo *town hall.

22 Q. [12:16:18] Now we're talking about a list of victims, but can you be more specific
23 as to the type of crimes that would be in this list, the type of victimisation that would
24 be registered in this list?

25 A. [12:16:35] There were various types of crimes, including cases of rape,

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1 destruction of property, gunshot injuries, deaths.

2 Q. [12:17:05] Now I would just like to ask you a little bit more about the
3 methodology that you and your assistants used to put this list together. So can you
4 just walk us a little bit step by step through the process that you would use?

5 A. [12:17:18] When it was a matter of injury that was visible, we could see, but we
6 also required that the victims provide prescriptions, medical prescriptions. Now,
7 when it came to destruction of property, I asked for photographs and a bailiff's report.
8 And when it came to injured persons, from time to time I even asked to see the injury
9 myself.

10 Q. [12:18:06] Where would this information be registered? Where would it be
11 physically put?

12 A. [12:18:15] Well, when we finished we would send the information to Mr Sylla
13 Aboubakary who had a computer who would then input the information to his
14 computer. So it was to Mr Sylla Aboubakary that the information was handed over.

15 Q. [12:18:39] All right. Madam Witness, I would like to now show you a
16 document. It's a confidential document.

17 MS BERDENNIKOVA: And if I could ask the court officer to display it, it's
18 CIV-OTP-0032-0054-0001. We can just show the first page for now of this document.
19 In fact, we can also give a hard copy of the document to the witness, as it is quite a
20 large document; it might be easier. I see a document on the screen, but we've
21 actually disclosed quite a while ago a much less redacted version.

22 THE COURT OFFICER: [12:20:09] Redacted version number 3 was displayed.

23 MS BERDENNIKOVA: [12:20:23]

24 Q. [12:20:23] Now, Madam Witness, just take a moment to look at the document.

25 Is this the document? Is this the list of victims that was drawn up by the committee

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1 that we're talking about?

2 A. [12:20:42] Yes.

3 Q. [12:20:45] Now, could we please turn to page 0033. And depending on

4 whether the witness is looking at the hard copy or the computer screen, she might

5 need maybe some assistance to find the right page. All right.

6 So at the top of that page it says "blessé 2", and I would like to draw your attention to

7 the 11th name on that list, and the name says Sirah Dramé, with the date 3

8 March 2011 in the next column. So is this a reference to yourself and the injury you

9 sustained on 3 March 2011?

10 A. [12:21:48] Yes, it's me, myself.

11 MS BERDENNIKOVA: [12:22:03] Your Honours, I'd like to request a brief private

12 session again just for a few names that might be familiar to you and this would

13 conclude my questioning for today.

14 PRESIDING JUDGE TARFUSSER: [12:22:11] Let's go into private session please.

15 (Private session at 12.22 p.m.)

16 (Redacted)

17 (Redacted)

18 (Redacted)

19 (Redacted)

20 (Redacted)

21 (Redacted)

22 (Redacted)

23 (Redacted)

24 (Redacted)

25 (Redacted)

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1 (Redacted)
2 (Redacted)
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23 (Open session at 12.26 p.m.)

24 THE COURT OFFICER: [12:26:32] We're in open session, Mr President.

25 PRESIDING JUDGE TARFUSSER: [12:26:41] The floor is yours.

1 MS BERDENNIKOVA: [12:26:45]

2 Q. [12:26:46] Thank you. Now, before I conclude my questions for you today,
3 there is only one clarification issue that was brought to my attention. Apparently
4 there might be a translation problem at page 25, lines 15 to 17 of the French transcript,
5 just for the record of the case. Page 24, line 15 to 17.

6 So, Madam Witness, I would just like to clarify something. Now, earlier today we
7 talked about what happened on 19 February 2011 during a meeting that was planned
8 for Abidjan north. Now, you mentioned that people were shot. Can you just say
9 again for the record who was it that shot on that day?

10 A. [12:27:45] It was the forces of law who shot at people.

11 Q. [12:27:57] Okay, thank you very much. Madam Witness, at this point I would
12 like to thank you for answering my questions and for being here. This concludes my
13 questioning for you today.

14 And I give the floor back. Thank you.

15 PRESIDING JUDGE TARFUSSER: [12:28:10] Thank you very much.

16 Madam Witness, now I give the floor to the representative for victims, to Madam
17 Massidda, for her questioning.

18 The floor is yours, Madam Massidda.

19 MS MASSIDDA: [12:28:24] Thank you, your Honour. I have a few follow-up
20 questions. With your indulgence, I would like to introduce myself because I could
21 not meet with the witness during the courtesy meeting.

22 PRESIDING JUDGE TARFUSSER: [12:28:34] I am indulgent. Please.

23 MS MASSIDDA: [12:28:37] Thank you very much.

24 QUESTIONED BY MS MASSIDDA: (Interpretation)

25 Q. [12:28:42] Good afternoon, Madam Witness.

1 A. [12:28:44] Good afternoon.

2 Q. [12:28:45] We have not had the opportunity to meet during the familiarisation
3 visit. My name is Paolina Massidda, and I represent the victims in these proceedings,
4 victims who were authorised to participate in the proceedings.

5 I'm going to put a few follow-up questions to you subsequent to the questions from
6 the Office of the Prosecutor.

7 Madam Witness, I would like to take you back briefly to what you told the Court in
8 relation to the event of 3 March 2011. A short while ago you mentioned -- and for
9 the record, I'm referring to the English transcript at page 46, line 7 to 9, and to the
10 French transcript page 44, lines 18 to 22. And I'm going to quote, Madam Witness,
11 what you said, and then I'll follow that up with a question. I quote, question from
12 the OTP: "When it comes to pecuniary compensation."

13 Answer from the Witness, "No. On the spot, as things happened, I went to a visit.
14 Now, our officials who were at the Golf had sent someone to bring money to me so
15 that I could give it to them." End of quote.

16 Now, I would like you to be more specific in relation to that event. First of all, who
17 handed over the money to you?

18 A. [12:30:56] It was our divisional leader, Mr Yéo *Kolotioloma, who gave us money so
19 that we could give the money to the family of the woman -- of the seven women who
20 were killed. So I went along with Mr Sylla Aboubakary for that purpose.

21 Q. [12:31:20] Do you know how much money was involved?

22 A. [12:31:26] I don't remember the amount.

23 Q. [12:31:28] Madam Witness, why was that money given to you to give to the
24 victims? What was the reason?

25 A. [12:31:45] We are in Africa. When there is a death or funeral, people need to be

1 able to organise such an event.

2 Q. [12:31:54] Very well. So this was money to assist the families, to arrange the
3 funerals?

4 A. [12:32:02] Yes. This was not compensation. It was money to organise
5 funerals.

6 Q. [12:32:10] Thank you. Now, Madam Witness, you have testified to several
7 events, during which many people were injured. Subsequent to those events, did
8 you keep in touch with those people who were injured or not?

9 A. [12:32:44] Yes.

10 Q. [12:32:48] Do you know whether most or certain of those people are still
11 suffering consequences?

12 A. [12:33:02] Yes. Some of them are still suffering consequences of those events to
13 this date.

14 Q. [12:33:11] Can you by any chance give us examples, any examples?

15 A. [12:33:24] Not later than last month, there was a victim called Ivakaba (phon)
16 who was operated to extract bullets. There is an indemnisation because they are
17 given expense vouchers if there is an operation. So he called me to talk about the
18 surgery. There was Amy Ouattara also. The month before last she was operated
19 upon.

20 Q. [12:33:59] Now, let us come back to your activities in the comité de *survie, or
21 survival committee, of Abobo. Apart from carrying out an identification of victims,
22 did this do any other activities, like providing material assistance to the victims?

23 A. [12:34:37] Yes. The mayor of the town hall, since he was in the Golf, he was
24 also helping his population through Mr Yéo *Kolotioloma. There were some people
25 who needed foodstuffs and these were sent to them.

1 Q. [12:35:07] Was the comité de *survie possibly able to help the victims with
2 medical treatment?

3 A. [12:35:22] Yes. We had a doctor called Dr Keita.

4 Q. [12:35:29] One last question, and it relates to the list that the Prosecutor showed
5 you a short while ago. I think you still have the list in front of you; is that correct?

6 A. [12:35:44] Yes.

7 Q. [12:35:44] Madam Witness, I've tried to go through the list, and I can see certain
8 names that reoccur. I can see Bakayoko, Cissé, Gaby (phon), Doumbia, Konaté,
9 Sanogo and Touré. Do you confirm that there are such names on the list?

10 A. [12:36:26] The majority of these people come from the north of Côte d'Ivoire.
11 They are northerners.

12 Q. [12:36:33] Thank you, Madam Witness. You have basically answered my
13 question, which was, is there any common denomination when you read these names.

14 A. [12:36:46] Yes.

15 Q. [12:36:50] What is it?

16 A. [12:36:51] The majority of the people who were targeted were people from the
17 north.

18 Q. [12:36:56] Thank you, Madam Witness.

19 PRESIDING JUDGE TARFUSSER: [12:36:57] We have understood.

20 Now, Madam Witness, it's time for the Defence for Mr Gbagbo to question you. We
21 have about 20 minutes before the lunch break. And I give the floor to Maître Altit.

22 MR ALTIT: [12:37:21] (Interpretation) Thank you, Mr President. Mr President,
23 your Honours. The questioning of the witness for the team of Mr Gbagbo will be
24 conducted by Ms Naouri.

25 PRESIDING JUDGE TARFUSSER: [12:37:38] Madam Naouri, the floor is yours.

1 I just recall that the Prosecutor took about 2 hours and 12 minutes, just for you to
2 know.

3 MS NAOURI: [12:38:10] (Interpretation) Thank you, Mr President.

4 QUESTIONED BY MS NAOURI: (Interpretation)

5 Q. [12:38:18] Good morning, Madam Witness.

6 A. [12:38:20] Good morning, Counsel.

7 Q. [12:38:22] My name is Jennifer Naouri, and today I'm going to put questions to
8 you on behalf of the Defence team of Laurent Gbagbo, okay?

9 A. [12:38:32] Yes.

10 Q. [12:38:35] While answering the questions of the President, page 6, lines 4 or 5, 4
11 and 5, you have said that you were a militant of the RDR since 1994. When did you
12 become an active militant within the RDR?

13 A. [12:39:00] I would say 1995.

14 Q. [12:39:16] Very well. And as from when did you take up responsibilities
15 within the RDR, or duties?

16 A. [12:39:26] I no longer remember the dates, but I was president of the comité de
17 base, then *section secretary.

18 Q. [12:39:43] Let us go from one position to the other within the RDR. So before
19 being president of comité de base, what were you?

20 A. [12:40:10] I was a supporter.

21 Q. [12:40:11] Very well. Who appointed you president of the comité de base?

22 A. [12:40:16] In order to be a president of the comité de base you have to contact
23 people, form a comité de base, and you become the president of comité de base.

24 Q. [12:40:31] Very well. And which people did you approach in order to become
25 president of the comité de base?

1 A. [12:40:40] The people of my neighbourhood and my compound.

2 Q. [12:40:49] Very well. Now, who was your superior when you were in the
3 comité de base?

4 A. [12:40:59] There is a president, there is a list of 16 people in each comité de base,
5 and it is the president of the comité who is the head of that committee of members.

6 Q. [12:41:20] Very well. And what does the comité de base correspond to, a
7 neighbourhood?

8 A. [12:41:32] Not at all.

9 Q. [12:41:34] What is it?

10 A. [12:41:38] After the comité de base, there is a section secretary. The comité de
11 base is made up of people that you organise, a group that you set up, and it is these
12 people who elect the section secretary, who is above the committee de base.

13 Q. [12:41:57] And what does the section correspond to?

14 A. [12:42:06] The section is composed of many comités de base who elect the
15 section secretary. So there are many comités de base who decide to designate
16 somebody in a precise area.

17 Q. [12:42:29] Very well. If understand well, above the comité de base you have
18 the neighbourhood or district; is that correct?

19 A. [12:42:41] There is the district. You have the neighbourhood, then you have the
20 district. It is a zone, an area, which may actually be composed of many section
21 secretaries in the same neighbourhood.

22 Q. [12:43:01] Very well. Did that same structure exist in all the neighbourhoods in
23 Abidjan?

24 A. [12:43:29] Yes. It existed in all the areas of Abidjan *for the Rassemblement des
25 Républicains. There was the political commissioner responsible for the

1 neighbourhood. *The political commissioner is above the section secretary.

2 Q. [12:43:41] We will come back to that, Madam Witness, but at one point you were
3 section secretary?

4 A. [12:43:49] I was president of comité de base, then after that, section secretary,
5 and today I am political commissioner.

6 Q. [12:43:59] Very well. And how many political commissioners are there in Abobo?

7 A. [12:44:14] At that time there were 24. Today we are 34 of us.

8 Q. [12:44:18] Very well. And let us backtrack a bit. Do you remember when you
9 were appointed section secretary of the RDR?

10 A. [12:44:31] It was quite some time ago. I've forgotten.

11 Q. [12:44:39] That's not a problem, Madam Witness. Madam Witness, can you tell
12 us who is above the political commissioner?

13 A. [12:44:54] The departmental officer is above the political commissioner.

14 Q. [12:45:01] Who was your departmental officer, Madam Witness?

15 A. [12:45:12] During the post-election crisis or now?

16 Q. [12:45:15] Yes, that is a good question. Before the crisis and then today.

17 A. [12:45:22] It was Adama Toungara who was our departmental officer during the
18 crisis.

19 Q. [12:45:32] And today?

20 A. [12:45:34] We have Mr Yéo *Kolotioloma, Traoré Maïmouna and Cissé
21 Abdramane. We have three departmental officers today.

22 Q. [12:45:47] Very well. And who is above the departmental officer?

23 A. [12:45:52] Those are the top leaders of the commune.

24 Q. [12:46:10] Very well. Is it the departmental officers who were in contact with
25 the Golf during the crisis?

- 1 A. [12:46:23] It was Mr Yéo *Kolotioloma who was in contact with Mayor Adama
2 Toungara.
- 3 Q. [12:46:35] Very well. And Maïmouna Touré, was she at the Golf also?
- 4 A. [12:46:47] No. She was not at the Golf.
- 5 Q. [12:46:49] And Virginie Touré?
- 6 A. [12:46:55] She was at the Golf.
- 7 Q. [12:46:56] Very well. What was Maïmouna Touré's role during the crisis?
- 8 A. [12:47:33] She is the president of the women's wing of the RDR in Abobo. And
9 I am the departmental secretary of the RDR women of Abobo.
- 10 Q. [12:47:45] Did Maïmouna Touré have another position apart from what you
11 have said?
- 12 A. [12:47:55] At the time of the crisis, she was the women's leader. It is now that
13 she has been elected departmental officer.
- 14 Q. [12:48:09] Very well. And who appointed you secretary general *of the
15 women's RDR in Abobo?
- 16 A. [12:48:35] It was Maïmouna Touré after her election, she appointed me secretary.
- 17 Q. [12:48:41] And when was that approximately, Madam Witness?
- 18 A. [12:48:45] 2004.
- 19 Q. [12:48:47] And today, Maïmouna Touré, what are her responsibilities?
- 20 A. [12:48:54] She is a departmental officer and she's also a deputy or member of
21 parliament.
- 22 Q. [12:49:05] When you say she's MP, MP for Abobo; is that correct?
- 23 A. [12:49:11] Yes, for Abobo.
- 24 Q. [12:49:12] Do you know whether she was the alternate to Mr Adama Toungara?
- 25 A. [12:49:20] Yes, she's the alternate.

- 1 Q. [12:49:24] During the crisis, who was her superior?
- 2 A. [12:49:29] It was Mr Adama Toungara.
- 3 Q. [12:49:35] Very well.
- 4 A. [12:49:49] During that period, there was a women's president, Touré Aya
- 5 Virginie, who was the national president of the women's wing of the RDR.
- 6 Q. [12:50:06] And this is the lady who was in contact with the Golf?
- 7 A. [12:50:15] Yes, Counsel.
- 8 Q. [12:50:20] Very well. When you *were political commissioner, you organise
- 9 rallies; is that correct?
- 10 A. [12:50:43] Yes.
- 11 Q. [12:50:44] Can you tell us where you organised the rallies?
- 12 A. [12:50:49] Each political commissioner has a clear area. I am the political
- 13 commissioner for the Bocabo district. So I organise rallies in my district.
- 14 Q. [12:51:05] Very well. And what do these rallies relate to?
- 15 A. [12:51:15] Well, during the elections you have to inform militants, train them
- 16 how to vote so that they should not put in spoiled ballots, and then you organise the
- 17 district.
- 18 Q. [12:51:37] Very well. When you say that you help people to vote, can you
- 19 elaborate?
- 20 A. [12:52:02] I did not quite understand.
- 21 Q. [12:52:04] You have just told us it depends. During the elections, you have to
- 22 inform the militants, train them how to vote so as not to put in spoiled votes, and
- 23 organise the districts. So how did you explain to people so as not to put in spoiled
- 24 votes?
- 25 A. [12:52:31] Each political party uses ballots and shows old people who do not

1 know how to hold a pen. They teach them how to mark a cross and not go over the
2 box.

3 Q. [12:52:52] So you had ballot papers to show them how to do it?

4 A. [12:52:57] Yes. Each politician had those samples, not the real ballot papers
5 themselves.

6 Q. [12:53:07] Very well. And where did you do that? Where did you carry out
7 the training?

8 A. [12:53:17] In our campaign headquarters in our district.

9 Q. [12:53:23] And where was that headquarters?

10 A. [12:53:28] Bocabo, in Bocabo. My district, there were *24 sub-neighbourhoods.
11 There were 24 sub-neighbourhoods in each neighbourhood and then in each
12 neighbourhood there was a campaign headquarters.

13 Q. [12:53:46] Very well. My question is, in your Bocabo district specifically, where
14 was that training taking place?

15 A. [12:53:56] In the Bocabo market.

16 Q. [12:54:00] Very well. And when you showed people how to vote with
17 specimens or samples, did you show them how to vote for Alassane Ouattara?

18 A. [12:54:14] Yes.

19 Q. [12:54:16] Did you explain to them that they had to be registered on the voter
20 rolls?

21 A. [12:54:25] Yes, we explained all those things to them.

22 Q. [12:54:28] Did other people explain to them also?

23 A. [12:54:32] I didn't quite understand you.

24 Q. [12:54:36] I'll repeat. I will go closer to the microphone. What else did you
25 explain to those people about the voting?

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1 A. [12:54:49] We asked them to go and cross-check whether their names appear on
2 the voters' lists. They should check and really keep their election card and identity
3 card safely, because it is with those documents that they will be able to vote.

4 Q. [12:55:21] Did you tell them that they should not vote with clothes bearing the
5 effigy of a candidate?

6 A. [12:55:41] Yes. That was all part of the awareness raising.

7 Q. [12:55:47] Very well. And during the election campaign, you were also a
8 supervisor of election activities; is that correct?

9 A. [12:56:05] Yes. Each political commissioner is a supervisor.

10 Q. [12:56:10] Very well. I will show you a document. It is CIV-OTP-0032-0044,
11 and it is document number 6 on our list of materials. This document will be
12 displayed on the screen; is that okay, Madam Witness?

13 A. [12:56:33] Mm-mm.

14 Q. Can you see that document, Madam Witness?

15 A. [12:57:13] Yes, Counsel.

16 Q. [12:57:18] Now, can you tell us briefly what it is?

17 A. [12:57:24] It is the authorisation as a supervisor, because each political
18 commissioner is supervisor in his or her zone. Without this document, you would
19 not have access to the polling station. The forces of law and order can expel you if
20 you are not mandated.

21 Q. [12:57:48] Very well. So this is your own document?

22 A. [12:57:51] Yes.

23 Q. [12:57:52] I will show you a second authorisation or proxy. It is
24 CIV-OTP-0032-0047, tab number 34. And it will be displayed once again on the
25 screen. Can you see the document, Madam Witness?

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1 A. [12:58:39] Yes. It is an authorisation as a supervisor for the second round.

2 Q. [12:58:44] Very well. Madam Witness, where did you supervise the first round
3 and then the second round of the elections?

4 A. [12:59:02] Still in my district.

5 Q. [12:59:06] Which polling station?

6 A. [12:59:11] I had three areas of voting and several polling stations that I have to
7 visit all around. So I had a mandate to supervise women also as secretary-general of
8 the women's wing.

9 Q. [12:59:37] Very well. Each time I observe a small pause to allow for
10 interpretation. So I will repeat my question. Can you tell us the three locations, the
11 areas that you were responsible for?

12 A. [12:59:59] *Elections were held in institutions. I had the école des filles, the
13 Bocabo school, and EPV Bocabo. These were polling stations. In each polling
14 station, there are several polling offices.

15 Q. [13:00:34] Very well. And did you visit those various polling stations?

16 A. [13:00:39] Yes.

17 Q. [13:00:45] Who decided on who was the assessor or monitor in this office, in this
18 polling station?

19 A. [13:00:55] The political commission.

20 Q. [13:00:57] Very well. In the 2010 elections, you were also a political
21 commissioner; is that correct?

22 A. [13:01:04] Yes, I was a political commissioner.

23 Q. [13:01:08] So you are the one who decided who would be the representatives?

24 A. [13:01:20] Yes. In any district there is a representative of young people, a
25 representative of the women. So when you have the representatives or if it comes to

1 young people, I look at the RJR wing of the party, and the leader will designate us or
2 suggest young people that we trust to represent us in those offices.

3 Q. [13:01:54] Very well. Which criteria do you use to designate those young people?

4 A. [13:02:02] You first of all have to be militants or members.

5 Q. [13:02:07] Any other criteria?

6 A. [13:02:11] Yes, militant of good moral standing. *Us women, we came later.

7 Not everyone can be a teller.

8 MS NAOURI: [13:02:20] Mr President, I'm looking at the time. I'm in your hands.

9 PRESIDING JUDGE TARFUSSER: [13:02:25] Yes. If this is a good moment, we
10 break now for lunch, and we continue in one hour and a half at 2.30, okay?

11 Thank you very much. The hearing is adjourned to 2.30.

12 THE COURT USHER: [13:02:38] All rise.

13 (Recess taken at 1.02 p.m.)

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

15 THE COURT USHER: [14:33:40] All rise.

16 Please be seated.

17 PRESIDING JUDGE TARFUSSER: [14:33:59] Good afternoon. Good afternoon,

18 Madam Witness. Are you okay? Have you had a rest? Have you eaten?

19 THE WITNESS: [14:34:12] (Interpretation) Yes, Mr President.

20 PRESIDING JUDGE TARFUSSER: [14:34:18] Now I give again the floor back to the
21 Defence for Mr Gbagbo.

22 And I would ask you to speak clear in the microphone and slowly. Thank you very
23 much. Ms Naouri, yours the floor.

24 MS NAOURI: [14:34:36] (Interpretation) Thank you, Mr President.

25 Q. [14:34:42] Just for purposes of housekeeping, and mindful of what the

1 Prosecution covered during the examination-in-chief, I think we will be using this
2 segment this afternoon and a little bit of tomorrow's first session for our questioning.
3 Now, Madam Witness, the Rassemblement de femmes républicaines, did it also work
4 in coordination with the Amazons of the RHDP?

5 A. [14:35:20] Yes, counsel.

6 Q. [14:35:21] Can you tell us which members of the Amazons you collaborated
7 with?

8 A. [14:35:27] All the Amazons are of the RDR. But it was with their president,
9 Koné Assetou, that we worked. Whenever we needed the Amazons we would tell
10 her that we needed some Amazons.

11 Q. [14:35:48] Thank you. Aminata Doumbia, did you know her, the secretary
12 general, did you know her?

13 A. [14:35:56] Aminata Doumbia, the secretary general of what?

14 Q. [14:36:08] Of the Amazons.

15 A. [14:36:12] I no longer remember.

16 Q. [14:36:14] Very well. No problem.

17 Now, did you also collaborate within the context of the Rassemblement des femmes
18 républicaines, did you also collaborate *with Association SOS femmes d'Abobo?

19 A. [14:36:30] Yes.

20 Q. [14:36:34] Do you remember the name of the president of that association?

21 A. [14:36:42] No, I don't remember. We had more than a hundred associations.

22 Q. [14:36:45] If I said Mariam Diomandé, would that ring a bell?

23 A. [14:36:53] Mariam Diomandé? I don't remember.

24 Q. [14:36:56] Very well. Now, let us go back to the election campaign period.

25 And following the announcement of the results, you received mandate as delegate of

1 the CEI to the second round of the 2010 elections; is that correct?

2 A. [14:37:21] Yes, counsel.

3 Q. [14:37:26] So let me now show you a document, CIV-OTP-0032-0048, tab 8 of our
4 list of materials. And this document will be displayed shortly for you as was the
5 case with the previous document.

6 A. [14:37:49] All right, counsel.

7 Q. [14:37:53] Madam Witness, do you see the document?

8 A. [14:38:31] Yes, counsel.

9 Q. [14:38:32] Is that your authorisation or mandate?

10 A. [14:38:36] Yes.

11 Q. [14:38:38] Who appointed you to that position?

12 A. [14:38:42] After the elections, there was centralisation. And as I told you, we
13 had 24 districts. So after the elections all the ballots were centralized at the Lycée
14 moderne d'Abobo, and that operation was referred to as centralisation. Delegations
15 were required to be present at that place as well to monitor and supervise the process.
16 I was a supervisor at that centralisation phase.

17 Q. [14:39:19] Yéo *Kolotioloma is the one who has signed and stamped this
18 document?

19 A. [14:39:40] He signed on behalf of the candidate and Mr Yéo *Kolotioloma was
20 the campaign manager who signed as well.

21 Q. [14:39:53] Very well. Was he Alassane Ouattara's campaign director in 2010?

22 A. [14:39:57] Yes, in Abobo.

23 Q. [14:39:58] What does he do today?

24 A. [14:40:00] Yéo *Kolotioloma?

25 Q. [14:40:08] Yes.

1 A. [14:40:09] He's the departmental director and vice governor.

2 Q. [14:40:15] Do you know whether he is the chief of cabinet of the minister? Let
3 me repeat my question and slow down. Do you know, Madam Witness, that today
4 he's the chief of cabinet for minister for oil and energy?

5 A. [14:40:33] Yes.

6 Q. [14:40:33] Now, Madam Witness, at the time of the crisis you were a municipal
7 councillor in Abobo. Can you tell us a little bit what your job entailed?

8 A. [14:41:04] As municipal councillor?

9 Q. [14:41:07] Yes.

10 A. [14:41:08] Well, I was the municipal councillor. The mayor, Adama Toungara,
11 had become minister of mines and power. And he gave us proxy or delegation of
12 authority, that is, four or five of us to be officials at weddings, to issue death
13 certificates and to also issue birth certificates as well as other legal documents.

14 Q. [14:41:40] Who else was part of those delegates or who else received that
15 delegation?

16 A. [14:41:55] Delegation to sign?

17 Q. [14:41:57] Yes.

18 A. [14:41:59] Mr Kalogo Abdoulaye, Mr Coulibaly Cécile, Mr Fofana Zoumana.
19 Now, are you talking about the period during the crisis or after the crisis?

20 Q. [14:42:18] I'm referring to the crisis. But please tell us about the crisis and then
21 tell us who is in those positions today.

22 A. [14:42:23] During the crisis, we had Mr Tchan, Bi Tchan (phon), Doumbia
23 Moussa, Madam Koné Aisatta, épouse Camara, and Madam Coulibaly Cécile, Fofana
24 Zoumana, Kalogo Abdoulaye and myself.

25 Q. [14:42:50] Very well. And all those people were members of the RDR?

- 1 A. [14:42:56] No, no. Madam Coulibaly Cécile is of the PDCI. Tori (phon)
2 Koudou Célestin was of the FPI.
- 3 Q. [14:43:11] What about the others?
- 4 A. [14:43:13] We were of the RDR.
- 5 Q. [14:43:18] Very well. Madam Witness, Jeanne Peuhmond, does that name ring
6 a bell?
- 7 A. [14:43:28] Yes. She was a deputy mayor.
- 8 Q. [14:43:30] Did you work with her?
- 9 A. [14:43:32] Yes.
- 10 Q. [14:43:36] Do you know what she does today?
- 11 A. [14:43:44] Well, she's a special advisor to the president in charge of gender.
- 12 Q. [14:43:50] In charge of gender and social affairs?
- 13 A. [14:43:53] Yes, yes.
- 14 Q. [14:43:54] What about Kandia Camara?
- 15 A. [14:44:02] Deputy mayor, minister of national education, that's what she is.
- 16 Q. [14:44:06] Very well. During the crisis, she was already the deputy mayor,
17 correct?
- 18 A. [14:44:14] Yes, she was the deputy mayor.
- 19 Q. [14:44:17] Did you work with her?
- 20 A. [14:44:19] Yes, yes, in the --
- 21 Q. [14:44:27] Very well. Now, Madam Witness, you spent a lot of time in politics
22 or politics took up a lot of your time. How did you earn your living during the crisis?
23 How did you make a living during the crisis?
- 24 A. [14:44:54] Well, I said that I was a dry-cleaner, and that was my business. But I
25 also worked at the mayor's office. And I was involved in some petite trading as

1 well.

2 Q. [14:45:10] Very well. Did you receive any remuneration or allowances in the
3 performance of your political duties?

4 A. [14:45:20] No. But we received monthly remuneration from the mayor's office,
5 transportation allowances.

6 Q. [14:45:31] Very well. Now, Madam Witness, I would like to hop back with you
7 to the march of 25 March 2004. Are we together?

8 Now, you yourself, you were one of the organisers of that march; is that correct?

9 A. [14:46:09] Yes, counsel.

10 Q. [14:46:12] How did you mobilise the marchers of that day?

11 A. [14:46:19] I told you that it was by telephone. I was the secretary, and we knew
12 how to mobilise our women in our district. I told you we had 24 commissioners,
13 and each commissioner was mobilising their district. So we were in charge of the
14 women and other association of women involved in politics -- or women not involved
15 in politics.

16 Q. [14:46:53] Very well. When you called up the women, did you give them an
17 itinerary for the march of 24 March?

18 A. [14:46:59] Well, when we call, it is to, first of all, indicate that we would
19 assemble or we would gather. The idea was for the march to take place at Plateau.
20 And we were supposed to use some vehicles from the mayor's office. And some
21 people would have also been able to walk. But we didn't have time to do that.

22 Q. [14:47:38] Now, Madam Witness, you had a plan to assemble on that day; is that
23 the case?

24 A. [14:47:49] A plan to assemble? Yes. We were supposed to gather at the
25 Plateau for the march.

1 Q. [14:47:58] Very well. Before people gathered at the Plateau, you were
2 supposed to meet up with the women elsewhere before going to the Plateau; is that
3 correct?

4 A. [14:48:08] Generally speaking, when we mobilise people, we meet at the mayor's
5 office roundabout and then we take vehicles.

6 Q. [14:48:23] So if I understand, there were vehicles available to take you to the
7 Plateau on that day; is that correct?

8 A. [14:48:33] Yes. However, you see, often people went by themselves without
9 having to use those vehicles.

10 Q. [14:48:43] Very well. Now that's clear.
11 And I would like to read out part of your statement to the OTP, and that is
12 paragraph 22 at page 0015, where you say, "On 24 March 2004, we left very early in
13 the morning. We were going to gather at the *Sans-Manquer-Abobo roundabout
14 and then converge on Plateau;" is that correct, Madam Witness?

15 A. [14:49:15] Yes, that is what I have just told you. There were a number of
16 pickup points. When we organised our rallies, those people in Clouetcha, Abobo
17 Baoulé, Akéikoi, and they all gathered at the roundabout while others gathered at the
18 mayor's office roundabout. And that's generally where most people tend to gather.
19 And it is from there that the vehicles, that they now board the vehicles to go on *to the
20 location, towards the Adama Sanogo building on the way to Dokui. There were
21 many people who went that way. That day, there were many assembly points.

22 Q. [14:49:56] Very well. At that various assembly points, who was coordinating
23 the marchers or the demonstrators?

24 A. [14:50:03] The coordinators. At each assembly point there was an officer in
25 charge or an official in charge.

1 Q. [14:50:25] Now, did you at your comité de base, did you organise any training
2 for the organizers of the march?

3 A. [14:50:36] Please can you repeat your question.

4 Q. [14:50:41] I'll repeat the question. Did your party, the RDR, take comité de base
5 of the RDR, for example, did such a group organise training for people who would
6 organise or coordinate marches?

7 A. [14:50:58] Well, those of us who -- no. Those of us who are political leaders, the
8 front line political leaders, we generally would inform the political commissioners,
9 who will then inform the section commissioners, who will then contact the comité de
10 base. It's a chain.

11 Q. Very well. On 25 March 2004, did you get to the *Sans-Manquer roundabout?

12 A. [14:51:45] No. We were not able to leave our neighbourhood.

13 Q. [14:51:48] Very well. How far did you go on that day after leaving your house?

14 A. [14:51:55] At the end of the tarmac road, not far away from the pharmacie
15 Kennedy, at that point there were already some uniformed men who were shooting
16 all over the place. So at the very beginning of the whole incident, my husband's
17 junior brother was struck by a bullet, and before he got to the hospital, he died on 25
18 March.

19 Q. [14:52:23] Madam Witness, what I'd like to understand is what you did yourself
20 and when. Madam Witness, you talked about the MI-24. Did you see them yourself?

21 A. [14:53:09] Yes. *When a plane is flying over you, you see it. They bombed
22 supporters from Anonkoua-Kouté and our militants who were coming from
23 Anonkoua and Anyama.

24 Q. [14:53:21] How many of them did you see?

25 A. [14:53:24] I don't remember the number.

1 Q. [14:53:43] Madam Witness, is that the day on which you were injured?

2 A. [14:53:45] Yes.

3 Q. [14:53:46] Did you go to see a doctor for treatment?

4 A. [14:53:51] Yes.

5 Q. [14:53:55] Do you have any documents from the doctor you saw, any
6 prescriptions or anything like that?

7 A. [14:54:01] I even had a medical certificate putting me on sick leave.

8 Q. [14:54:07] Very well. Do you still have that document?

9 A. [14:54:11] No. Unfortunately, I lost it.

10 Q. [14:54:13] Very well. Madam Witness, did you personally see who was
11 shelling Anyama or *Anonkoua-Kouté?

12 A. [14:54:45] Well, I saw, I saw injured persons. As I told you, I was the president
13 of the victims of the events in 2004. There were people who were injured in the legs,
14 whose legs were shattered.

15 Q. [14:55:03] Madam, where were you on 25 March 2004?

16 A. [14:55:08] We were not able to leave our neighbourhood. And as I already told
17 you, all the hospitals were closed and the injured persons were sent to the Clouetcha
18 hospital.

19 Q. [14:55:31] Very well. Madam Witness, the comité for the victims of the events
20 of 25 March 2004, when was it created?

21 A. [14:55:54] It was created after the events. It was created after the 2004 events
22 since so many people were injured and so many people had died.

23 Q. [14:56:05] How much time after the 2004 events?

24 A. [14:56:11] I don't remember the date, but we have a receipt that testifies to our
25 submitting our files.

1 Q. [14:56:25] Oh, I didn't get that. You have a receipt for what? For submitting
2 your documents?

3 A. [14:56:34] Yes.

4 Q. [14:56:34] Do you have a copy of that receipt with you?

5 A. [14:56:37] No, I don't.

6 Q. [14:56:38] Well, that's not a problem, but if we were to want to have that
7 document, we will proceed as need be.

8 So now who were the members of that committee?

9 A. [14:56:51] All the victims.

10 Q. [14:56:58] Now, there is a committee and you're the president?

11 A. [14:57:06] Yes, I am the president.

12 Q. [14:57:08] Does that committee have an executive?

13 A. [14:57:11] Yes. There was an executive of that committee made up of the RDR
14 and the RJR, so for the RDR and the youth. And this happened in Abidjan, in each
15 neighbourhood the president of the youth wing of each commune was a member of
16 that committee and a member of the executive of the committee. So at the time there
17 was Seydou Diabaté from Anyama, Soumahoro Losseni from Marcory, Tioro Ouma
18 (phon) from Treichville, Dosso from Adjamé, Sidibé for Port-Bouët, and myself, I was
19 from Abobo. And there were other victims, Salimata Fofana, Bakayoko Abdoulaye.

20 Q. [14:58:24] Very well. What was their political party?

21 A. [14:58:32] Members of the bureau were of the RJR, the RDR youth, because they
22 were victims. You see, during these marches, it is the youth that are in the forefront
23 and we follow from behind. And they were the victims. So in order to be a
24 member of the collective of victims, you had to be a victim or a victim's relative.

25 Q. [14:59:02] And the RJR is the youth wing of the RDR; is that correct?

- 1 A. [14:59:11] Yes, it's the youth of the RDR.
- 2 Q. [14:59:15] Who funds this committee?
- 3 A. [14:59:17] Fund the committee?
- 4 Q. [14:59:21] Mm-mm.
- 5 A. [14:59:21] We do, the victims.
- 6 Q. [14:59:27] Very well. And how do you locate these victims?
- 7 A. [14:59:32] The victims, well, for each event there were victims.
- 8 Q. [14:59:41] Very well.
- 9 A. [14:59:46] After each event, we would draw up a list of victims. We would,
- 10 each official would draw up a list of people from his or her individual commune and
- 11 then we would draw up a main list.
- 12 Q. [15:00:03] Very well. And did you have any particular method?
- 13 A. [15:00:11] Yes.
- 14 Q. [15:00:12] Can you explain it to us?
- 15 A. [15:00:15] Well, the person would approach us, and if the person still had
- 16 prescriptions or physical signs or a medical certificate, or in particular if they had a
- 17 medical certificate.
- 18 Q. [15:00:31] Very well. Thank you, Madam Witness. We'll move on to
- 19 something else now, okay?
- 20 I'd like us to talk about the march upon the RTI. Madam Witness, do you remember
- 21 when Guillaume Soro issued this call to march upon the RTI, how much time before
- 22 the actual march?
- 23 A. [15:01:28] If you could rephrase.
- 24 Q. [15:01:31] Of course. Do you remember when you yourself heard the call
- 25 issued by Guillaume Soro to march upon the RTI?

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1 A. [15:01:47] Well, *I was told by my president, and since I am the secretary of the
2 RDR women. And since, you see, Mr Guillaume Soro wanted us to march upon the
3 RTI to liberate it, I was told to place the phone calls.

4 Q. [15:02:15] Very well. So when did she call you?

5 A. [15:02:23] The day before.

6 THE INTERPRETER: [15:02:37] Interpreter correction, the lady mentioned was
7 Maïmouna Touré.

8 MS NAOURI: [15:02:44] (Interpretation)

9 Q. [15:02:44] Did she tell you whether the march had been officially notified to the
10 government of Mr Gbagbo?

11 A. [15:02:49] I don't know.

12 PRESIDING JUDGE TARFUSSER: [15:03:03] You don't know or did she not tell you?
13 Because the question was: Did she tell you?

14 THE WITNESS: [15:03:10] (Interpretation) We didn't talk about it.

15 MS NAOURI: [15:03:14] (Interpretation) Thank you, your Honour.

16 Q. [15:03:21] What was the role played by Ms *Maïmouna Touré when it came to
17 the actual organisation of the march?

18 A. [15:03:30] She was the president of the republican women --

19 THE INTERPRETER: [15:03:38] Overlapping speakers.

20 THE WITNESS: [15:03:39] (Interpretation) Also the order from the hierarchy.

21 PRESIDING JUDGE TARFUSSER: [15:03:42] I would ask you not to overlap. Don't
22 answer immediately. Wait a second, wait for the finishing of the question, then wait,
23 breathe, and then respond. Thank you.

24 THE INTERPRETER: [15:03:56] Many thanks from the interpreters.

25 THE WITNESS: [15:04:05] (Interpretation) Well, when she got the orders from the

1 hierarchy, she would inform me and I, in turn, would inform the women. I would
2 carry out the mobilisation.

3 MS NAOURI: [15:04:22] (Interpretation)

4 Q. [15:04:24] And what was the instruction?

5 A. [15:04:27] It was to go and protest -- correction, to install the new director of the
6 RTI who had been appointed by Mr Ouattara.

7 Q. [15:04:44] And for this specific demonstration, this march upon the RTI, who
8 was the hierarchy?

9 A. [15:05:02] Well, there was the departmental officer, the national president, the
10 national president of the RDR women, Touré Virginie. And when they had
11 information, she would call Ms Touré Maïmouna, and she in turn would inform me.

12 Q. [15:05:25] And Aya Virginie Touré, who did she get her information from?

13 A. [15:05:32] I don't know.

14 Q. [15:05:33] Very well. And Maïmouna Touré, did she give you specific
15 instructions?

16 A. [15:05:46] Well, she instructed me to mobilise the women, to call the women,
17 and that's what I did.

18 Q. [15:05:55] Now, when you mobilise people, what assembly point would you tell
19 the demonstrators to come to?

20 A. [15:06:06] We were to meet up at the town hall roundabout and then we would
21 take buses or the Sans-Manquer roundabout. As usual, there were the usual
22 assembly points.

23 Q. [15:06:22] Very well. So in addition to Sans-Manquer and the town hall
24 roundabout, what were the other assembly points?

25 A. [15:06:30] Well, usually when we use the Derrière-Rails neighbourhood, Silex.

1 Then there is PK18 and then towards Anonkoua.

2 Q. [15:06:55] Very well. And do you know who was supposed to organise the
3 demonstrators at each one of these assembly points?

4 A. [15:07:04] Well, there were political officials for each neighbourhood.

5 Q. [15:07:10] Very well. And what time were the people supposed to leave the
6 assembly points, the ones that you were responsible?

7 A. [15:07:25] *Quite early, some go at 7. It depends.

8 Q. [15:07:32] Very well. And you, Madam Witness, which assembly point did you
9 go to?

10 A. [15:07:40] Well, around towards Sans-Manquer. I came from Clouetcha, and at
11 Sans-Manquer I did not see any vehicles, so I continued along my way. And I
12 headed towards the Adama Sanogo building, and then I was called by Ms Touré
13 Maïmouna, and she said not to continue on.

14 Q. [15:08:10] Very well. Now, you say that you did not see any vehicles at
15 Sans-Manquer. Does that mean that vehicles were supposed to be waiting for you
16 there?

17 A. [15:08:18] *Yes, maybe the vehicles got scared, because there were uniformed
18 men with weapons on rooftops. And often, you know, we wouldn't necessarily wait
19 for the vehicles. Often we would walk. You could walk from Abobo to le Plateau.

20 Q. [15:08:38] Very well. And how much time would it take to walk from Abobo to
21 le Plateau?

22 A. [15:08:46] I've never actually timed it. I couldn't tell you.

23 Q. [15:08:52] Could you give us an estimate?

24 A. [15:08:55] It's quite a distance. But the goal is to get there, to get to the place.

25 Q. [15:09:03] Did you have any meetings with Madam Touré to organise the

1 march?

2 A. [15:09:17] She called me. There were no meetings as such.

3 Q. [15:09:27] Very well. Madam Witness, Ben Soumahoro Vaphings, did you ever
4 work with that person as part of your mobilisation?

5 A. [15:10:05] I beg your pardon?

6 Q. [15:10:09] Ben Soumahoro Vaphings, does that name ring a bell?

7 A. [15:10:12] I don't know that person.

8 Q. [15:10:17] Did you mobilise people with the assistance of the MAI group?

9 A. [15:10:35] The MAI group? No. It was a march that was supposed to be
10 RHDP march.

11 Q. [15:10:45] Very well. Other than phone calls, did you do anything else to
12 mobilise demonstrators?

13 A. [15:10:58] Not particularly. I called them and then also by word of mouth, I would
14 tell people and tell them to spread the word. That's what we call it, word of mouth.

15 Q. [15:11:18] For this march, did you make any signs?

16 A. [15:11:24] No, I didn't make any signs.

17 Q. [15:11:25] Very well. And when it came to security, ma'am, did you tell the
18 demonstrators or did you try to get the message across to the demonstrators that
19 Ouattara soldiers were supposed to clear the way all the way to the RTI?

20 THE INTERPRETER: [15:12:04] Answer inaudible.

21 MS NAOURI: [15:12:06] (Interpretation)

22 Q. [15:12:07] Very well.

23 PRESIDING JUDGE TARFUSSER: [15:12:08] We didn't get the answer. We didn't
24 get the answer. It was not audible, because too quick, overlap.

25 MS NAOURI: [15:12:14] (Interpretation)

1 Q. [15:12:16] *I believe you said "I did not say that". Could you kindly repeat your
2 answer.

3 A. [15:12:22] People told us that the march would be safe. There would be
4 security. But other than that, I didn't really know any more than that.

5 Q. [15:12:37] Who did you go with when you went towards the march on *16
6 December?

7 A. [15:13:24] I was alone.

8 Q. [15:13:26] Let me read out something to you, something from the statement you
9 gave to the OTP, all right. You said, paragraph 50, you said, "On the morning I
10 left" -- No. What did I say?

11 Paragraph 59. Paragraph 59, page 0021, you said, "On the morning of 16 December, I
12 left my neighbourhood at 8 in the morning and I walked with three men who are
13 friends of my elder brother. These men are Sindou Kamaraté" --

14 A. [15:14:14] There was him. *There was Diaby Moustapha and my elder brother,
15 Massylla Dramé, and my eldest son, Bakayoko Cheik Amin. When I left the house, I met up
16 with them at the Sans-Manquer roundabout and together we walked, we walked together.

17 Q. [15:14:38] Very well, Madam Witness. So I wasn't able to finish my question,
18 but it's not important, don't worry.

19 Have I correctly understood that you met up with those people at the Sans-Manquer
20 roundabout?

21 A. [15:15:01] Yes. As I was leaving the neighbourhood, there is a major
22 intersection, that's where I met up with them.

23 Q. [15:15:11] And where did you go from Sans-Manquer?

24 A. [15:15:32] We converged and headed towards le Plateau.

25 Q. [15:15:36] Yes. But le Plateau is very far away, more than two hours of

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1 walking.

2 Let me put my question, please. My question is this: You went past Sans-Manquer.

3 You saw that there were no buses. You met up with some people and you headed in
4 a particular direction?

5 A. [15:15:57] The RTI, Cocody.

6 Q. [15:16:00] My question to you is this: Where were you walking exactly? Were
7 you heading towards the Mobil station? You were along the Zoo road? Please
8 explain.

9 A. [15:16:15] Well, there are various shortcuts. There is one neighbourhood called
10 Plateau-Dokui. *And if you go in there, there are some shortcuts to get to Cocody
11 around Carrefour de la Vie. And there are various shortcuts you can take. *You can go
12 by le Plateau-Dokui, up past the Adama Sanogo building, then the Mobil gas station, and
13 you get to le Plateau-Dokui, then you can head towards -- well, you see, there are shortcuts.

14 Q. [15:16:54] Very well. And when did you take these shortcuts and when did
15 you get the call from Maïmouna?

16 A. [15:17:06] I don't remember the time. I was close to the Adama *Sanogo
17 building, and she called and she said not to continue on. She told me that people
18 were being killed. I was already at the building, at the Adama building. And I was
19 to tell the women not to head out, not to leave.

20 Q. [15:17:29] Very well. And did you do that, did you transmit this message to
21 the women?

22 A. [15:17:38] I didn't have my notebook, so I had to go back home and get my
23 notebook to make the calls.

24 PRESIDING JUDGE TARFUSSER: [15:17:47] The cell phone you mean by
25 "notebook"? It was translated "my notebook."

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- 1 THE WITNESS: [15:18:01] (Interpretation) No, I mean a notepad where I wrote
2 down the telephone numbers.
- 3 PRESIDING JUDGE TARFUSSER: [15:18:06] Okay. Thank you.
- 4 MS NAOURI: [15:18:18] (Interpretation)
- 5 Q. [15:18:19] Very well. So you thought you were going to go back home and get
6 your notebook; is that what you are telling us?
- 7 A. [15:18:24] Mm-mm.
- 8 Q. [15:18:25] And you didn't have any phone numbers already recorded in your
9 mobile phone?
- 10 A. [15:18:34] Not for those women, for other people. But the list of our supporters,
11 I didn't have that list on my telephone.
- 12 Q. [15:18:44] Very well. And you were far from home?
- 13 A. [15:18:48] It was a ways off. It was a bit of a distance.
- 14 Q. [15:18:55] And were there some women around you that you were able to warn
15 after you got this call from Ms Touré?
- 16 A. [15:19:05] Huh?
- 17 Q. [15:19:06] After you hung up, and she had told you not to mobilise the women,
18 did you look around you?
- 19 A. [15:19:14] There were people, there were many people, there were many people.
- 20 Q. [15:19:18] Very well. And what did you tell these people?
- 21 A. [15:19:23] They were supporters, and when you tell them, "Oh, don't go," some
22 people want to go anyways, and they go off to see what's going on there.
- 23 Q. [15:19:37] Very well. Do you know who warned Ms Touré?
- 24 A. [15:19:49] I don't know.
- 25 Q. [15:19:52] And when you decided to go back home, what way did you go?

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- 1 A. [15:20:08] Well, since there was trouble, I had to find shortcuts to get back home.
- 2 Q. [15:20:17] Very well. And did you see any uniformed men as you went back
- 3 home?
- 4 A. [15:20:23] No, I didn't see any as I went back home.
- 5 Q. [15:20:28] And on the way to, did you see?
- 6 A. [15:20:34] Yes, I did see uniformed men posted on buildings with weapons.
- 7 Q. [15:20:41] How many?
- 8 A. [15:20:42] Two.
- 9 Q. [15:20:43] Those were the only ones you saw that day?
- 10 A. [15:20:45] Yes.
- 11 Q. [15:20:45] Madam Witness --
- 12 A. [15:21:17] Yes.
- 13 Q. [15:21:20] -- do you know some men who were around the body that you
- 14 filmed?
- 15 A. [15:21:26] Yes. The men who were standing around, yes. They were weeping
- 16 and wailing and mourning. I had a particular task, I had a job to do. I had to move
- 17 fast. I didn't want the women to go away, to leave.
- 18 Q. [15:21:50] Very well. And the video footage you shot, page 21, line 17, page 22,
- 19 line 3, you mentioned this morning in the transcript, do you still have the video
- 20 footage on the phone?
- 21 A. [15:22:10] No.
- 22 Q. [15:22:11] Did you make a copy of the footage?
- 23 A. [15:22:14] No.
- 24 Q. [15:22:17] And before showing the footage to the OTP investigators, did you
- 25 show it to anyone else?

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1 A. [15:22:25] Yes, I did, to some people in the evening. When -- well, when
2 discussing the situation, I would show the footage, yes.

3 Q. [15:22:44] Very well. At that time did you forward the footage to these people,
4 pass it on? Did you provide copies?

5 A. [15:23:05] I didn't give copies, but I --

6 THE INTERPRETER: [15:23:08] Inaudible.

7 THE WITNESS: [15:23:10] (Interpretation) -- to the people.

8 MS NAOURI: [15:23:12] (Interpretation)

9 Q. [15:23:13] Very well.

10 THE INTERPRETER: [15:23:14] Correction, I showed it to the people.

11 MS NAOURI: [15:23:16] (Interpretation)

12 Q. [15:23:17] And when you changed phones, what did you do with the old video,
13 with the video footage on it?

14 A. [15:23:23] Well, when I change and get a new phone, I give the old phone to the
15 kids.

16 Q. [15:23:31] So one of your children still has the phone?

17 A. [15:23:33] I don't know.

18 Q. [15:23:33] Very well. How many children do you have?

19 A. [15:23:37] Five, two boys and three girls.

20 Q. [15:23:45] Very well. And if we were to ask them, do you think they could tell
21 us whether they still have that phone with the footage?

22 A. [15:23:54] I don't know.

23 Q. [15:23:55] That's not a problem.

24 A. [15:23:57] That was seven years ago, you see.

25 Q. [15:24:03] My last question about the footage, how did the OTP investigators get

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1 the footage?

2 A. [15:24:15] I gave it to them myself.

3 Q. [15:24:19] How did you do that?

4 A. [15:24:24] I don't know. I guess I must have downloaded it.

5 Q. [15:24:29] Okay. So you gave the telephone to the investigators and they did
6 what was necessary.

7 That's okay, Madam Witness, we'll move on to something else.

8 THE INTERPRETER: [15:25:00] The witness's reply to the last question was

9 "Mm-mm."

10 MS NAOURI: [15:25:26] (Interpretation)

11 Q. [15:25:27] Madam Witness, now this morning you made mention of some
12 resistance groups in Abobo; remember?

13 A. [15:25:40] Yes.

14 Q. [15:25:40] Very well. It was page 29, line 14 and onwards, you gave the names
15 of some leaders, Toumc, I believe?

16 A. [15:26:09] Toumc.

17 Q. [15:26:10] Toumc, okay. Others?

18 A. [15:26:13] I'm trying to remember.

19 Q. [15:26:22] Paragraph 112 of your statement, you said this, "There was a leader by
20 the name of Toumc. He was a man who belonged to the drivers' union. There was
21 another leader by the name of Siaka, but he died during the conflict." End of quote.

22 Is that correct, Madam Witness?

23 A. [15:26:50] Yes.

24 PRESIDING JUDGE TARFUSSER: (Microphone not activated)

25 MS NAOURI: [15:26:59] That's her statement. Maybe there is a problem with it.

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1 Q. [15:27:06] And I should have finished the quote. You also said, "At the time I
2 didn't have specific information about the actions taken by these groups. They kept
3 them secret."

4 In the meantime did you find out what these groups were doing?

5 A. [15:27:19] I don't know.

6 Q. [15:27:21] But you knew that there were FDS soldiers who had rallied to these
7 resistance groups?

8 A. [15:27:28] I don't know.

9 Q. [15:27:29] Now, you said, ma'am, paragraph 73 of your statement, you said, "In
10 January and February, some resistance groups were set up to defend the community
11 against Gbagbo's forces. It started at PK18. And one day it was said that
12 Commander IB had come to Abobo and was fighting Gbagbo's forces. I don't know
13 what the names of these groups were. I heard talk about the invisible ones, but that
14 was some time after.

15 Amongst the uniformed men there were officers who couldn't bear Gbagbo and
16 couldn't support him, and they had decided to oppose him. I don't know whether
17 they had formed an alliance with IB. I think that there were a number of groups
18 who had come together to defend their communities against the Gbagbo forces."
19 End of quote.

20 Did you say that, Madam Witness?

21 A. [15:28:40] That's what I heard. I didn't see, but that is what I heard. That is
22 what I told the investigators. It's not as though I knew these people myself, but I
23 gave an account.

24 Q. [15:28:57] So you heard talk about --

25 THE INTERPRETER: [15:29:00] Overlapping.

1 PRESIDING JUDGE TARFUSSER: [15:29:08] Overlapping speakers.

2 MS NAOURI: [15:29:10] (Interpretation)

3 Q. [15:29:11] Let me put my question again. So you heard people saying that
4 soldiers had joined these resistance groups?

5 A. [15:29:18] Yes.

6 PRESIDING JUDGE TARFUSSER: [15:29:24] That's exactly what she said. That's
7 exactly what she said. Now we have it twice on the record. Okay.

8 MS NAOURI: [15:29:29] (Interpretation)

9 Q. [15:29:33] Madam Witness, did you know or did you hear about the location of
10 the bases of the resistance groups in Abobo?

11 A. [15:29:56] They were at PK18 at some point. It started at PK18.

12 Q. [15:30:03] It started at PK18 and then?

13 A. [15:30:08] And then they were scattered all over.

14 Q. [15:30:10] Very well. Was there a base at Derrière-Rails?

15 A. [15:30:22] Yes.

16 Q. [15:30:26] Near the mayor's office in Abobo?

17 A. [15:30:29] They were scattered all over the place.

18 Q. [15:30:36] Very well, Madam Witness.

19 This morning when answering questions from the Prosecution at page 30, line 16,
20 page 31, line 3, you talked about your son; and you said you had two sons. Please
21 don't mention any of the names because we're open session.

22 A. [15:31:18] It's the first.

23 MS NAOURI: (Interpretation) Mr President, maybe we should go into private
24 session.

25 THE WITNESS: [15:31:24] I agree with that.

- 1 PRESIDING JUDGE TARFUSSER: [15:31:25] Let's go into private session for this.
- 2 Thank you.
- 3 (Private session at 3.31 p.m.)
- 4 (Redacted)
- 5 (Redacted)
- 6 (Redacted)
- 7 (Redacted)
- 8 (Redacted)
- 9 (Redacted)
- 10 (Redacted)
- 11 (Redacted)
- 12 (Redacted)
- 13 (Redacted)
- 14 (Redacted)
- 15 (Redacted)
- 16 (Redacted)
- 17 (Redacted)
- 18 (Redacted)
- 19 (Redacted)
- 20 (Redacted)
- 21 (Redacted)
- 22 (Redacted)
- 23 (Redacted)
- 24 (Redacted)
- 25 (Redacted)

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- 1 (Redacted)
- 2 (Redacted)
- 3 (Redacted)
- 4 (Redacted)
- 5 (Redacted)
- 6 (Redacted)
- 7 (Redacted)
- 8 (Redacted)
- 9 (Redacted)
- 10 (Redacted)
- 11 (Redacted)
- 12 (Redacted)
- 13 (Redacted)
- 14 (Open session at 3.34 p.m.)
- 15 THE COURT OFFICER: [15:34:30] We are back in open session, Mr President.
- 16 PRESIDING JUDGE TARFUSSER: [15:34:47] Let's take a break of a few minutes to
- 17 allow the witness to recover.
- 18 The hearing is adjourned until the court officer is calling us back.
- 19 THE COURT USHER: [15:34:57] All rise.
- 20 (Recess taken at 3.34 p.m.)
- 21 (Upon resuming in open session at 3.46 p.m.)
- 22 THE COURT USHER: [15:46:54] All rise.
- 23 Please be seated.
- 24 PRESIDING JUDGE TARFUSSER: [15:47:11] Madam Dramé, how do you feel?
- 25 THE WITNESS: [15:47:24] (Interpretation) Yes, Mr President. Yes, Mr President.

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1 PRESIDING JUDGE TARFUSSER: If you prepare to suspend today, we can suspend
2 and go to tomorrow morning. We have sufficient time.

3 THE WITNESS: [15:47:45] (Interpretation) We can continue, Mr President.

4 PRESIDING JUDGE TARFUSSER: [15:47:47] Okay. Thank you very much.
5 So, Madam Naouri.

6 MS NAOURI: [15:47:50] (Interpretation) Thank you, Mr President.

7 Q. [15:48:00] Madam Witness, this morning we talked about the incident of 19
8 February. And at page *23 of the transcript you told us that after that attack, the
9 mayor's office was closed?

10 A. [15:48:21] Yes, counsel.

11 Q. [15:48:24] Very well. When did the mayor's office reopen after the crisis?

12 A. [15:48:34] Shortly after Mr Laurent Gbagbo fell from power.

13 Q. [15:48:39] Very well. And when did you return to work at the mayor's office?

14 A. [15:48:45] I don't remember the date. It was after.

15 Q. [15:48:51] After what?

16 A. [15:48:54] After Mr Laurent Gbagbo fell from power.

17 Q. [15:48:59] Very well. Very well.

18 Now, the resistance groups in Abobo, they were stronger and they defeated the FDS;
19 is that correct?

20 A. [15:49:27] I don't know.

21 Q. [15:49:31] At paragraph 110 of your statement, page 0030, "The resistance forces
22 successfully liberated Abobo from Gbagbo's forces between February and April 2011.
23 They attacked the police stations at the 14th, 21st and *32nd arrondissements;" is that
24 correct?

25 A. [15:49:58] Can you repeat the question?

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1 Q. [15:50:03] I was asking you whether the resistance groups defeated the FDS and
2 they were stronger than them. And you said you don't know, you don't remember.
3 Now I'm reading out a part of your statement in which you talk about that, page 0030
4 at paragraph 110 of your statement, and this is what you say:

5 "The resistance forces succeeded to liberate Abobo from Gbagbo's forces between
6 February and April 2011."

7 Then you go on to say, "They attacked, that is the resistance forces attacked the
8 commissariats at the 14th, 21st and 32nd arrondissements."

9 Is that your statement, Madam Witness?

10 A. [15:50:52] The commissariat of the 14th and 21st and 32nd arrondissements were
11 attacked, but I don't know which group attacked them.

12 Q. [15:51:01] Very well. Now, the gendarmerie, were you aware that it had come
13 under attack?

14 A. [15:51:27] The Abobo gendarmerie?

15 Q. [15:51:30] Yes.

16 A. [15:51:34] No, I don't remember.

17 Q. [15:51:39] Okay. In your capacity as an elected local authority, did you not
18 receive that information? I say so because Witness 364 came here and his statement
19 was admitted under Rule 68(3), and he testified in open session without protective
20 measures.

21 I'm sorry.

22 And in his statement, the witness says the following at page -- well, his statement is in
23 tab 43 of our list of materials, and it bears the number CIV-OTP-0071-0437_R02.

24 And this is what the witness says at paragraph 24 --

25 MR MACDONALD: Can you allow us --

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1 PRESIDING JUDGE TARFUSSER: [15:52:39] Mr MacDonald.

2 MR MACDONALD: [15:52:40] If we can have 2 seconds to go to *onglet 48 and to
3 look at the --

4 *MS NAOURI: [15:52:46] 43.

5 MR MACDONALD: [15:52:48] Sorry, 43, and look at the statement at paragraph 48
6 with your Honour's indulgence, please.

7 MS NAOURI: [15:52:56] (Interpretation) Paragraph 24.

8 Can I proceed? Thank you.

9 Q. [15:53:23] Now, Madam Witness, at paragraph 24 this is what you say -- rather,
10 you are not the one who said this. I just correct. This is what the witness told us:
11 "The Môgôba were at the gendarmerie, but they were not gendarmes. I know that
12 they were not gendarmes because they did not have uniforms, because these
13 gendarmes had already fled from the time of the election period. I know that the
14 Môgôba were at the gendarmerie because I saw them there. They used to live there
15 with the Dozos, the traditional hunters. I saw them there as well."

16 Now, my question to you, you, as local elected official, did you receive this type of
17 information? Was it brought to your attention?

18 A. [15:54:11] I don't know. I didn't have that kind of information. I didn't
19 receive that kind of information.

20 Q. [15:54:15] Madam Witness, from when did you begin to hear mention of the
21 Commando Invisible?

22 A. [15:54:46] From February.

23 Q. [15:54:54] Very well. Who was the leader of the Commando Invisible?

24 A. [15:54:57] I don't know, madam.

25 Q. [15:55:02] Very well. At paragraph 73 of your statement, page 0023, this is

1 what you say:

2 "In January and February, there were resistance groups created to defend the
3 community against Gbagbo's forces. It started at PK18. And one day it was said
4 that Commander IB had come to Abobo and was fighting against Gbagbo's forces."

5 Who is Commander IB?

6 A. [15:55:50] I already told you that people said that Commander IB was there.
7 But unfortunately he died.

8 Q. [15:56:00] Very well.

9 Madam Witness, we'll now move on to another line of questioning. I would like us
10 to talk about the women's march of 3 March 2011. Okay? Whose initiative was it to
11 organise that march?

12 A. [15:57:09] The day before, Madam *Touré Maïmouna, my president, called me
13 seeking my opinion as to whether we could get the women in all neighbourhoods to
14 manifest and to get Laurent Gbagbo to leave. So I told her to call other women and
15 seek their opinion as well. Most of the women wanted us to go out and tell Mr
16 Laurent Gbagbo to leave since he had lost the elections.

17 Q. [15:57:49] Did Touré Maïmouna tell you who had asked her to take the initiative
18 for the march?

19 A. [15:58:02] She did not tell me.

20 Q. [15:58:07] Did Aya Virginie Touré call you in relation to the organisation of the
21 march?

22 A. [15:58:21] Well, when she found out as our national president, she was informed
23 of the intention to have a protest march, so she called to find out if the women had
24 been mobilised.

25 Q. [15:58:37] She learnt that you and Maïmouna had decided to organise a march;

1 is that correct?

2 A. [15:58:43] Yes.

3 Q. [15:58:44] Very well. What instructions did Maïmouna Touré give?

4 A. [15:59:08] Can you repeat the question, counsel?

5 Q. [15:59:11] Now, Maïmouna Touré called you?

6 A. [15:59:15] Yes.

7 Q. [15:59:15] Did she give you any specific instructions regarding the organisation
8 of the march?

9 A. [15:59:22] During the post-election crisis, all our activities were under the RHDP
10 or conducted under the RHDP. So she asked me to contact the president of the PDCI,
11 the MFA and IDPCI, the president of the Amazons, and the one who was in charge of
12 civil society organisations and as well as the faith-based women's organisations.

13 Q. [15:59:54] To your knowledge, did the president of the PDCI talk about
14 participation in the march to that person's authorities?

15 A. [16:00:22] I don't know. But she was at the march with me. I can tell you that.

16 Q. [16:00:28] Now, you had an organisation meeting with Maïmouna Touré for that
17 meeting?

18 A. [16:00:43] No. There was no such meeting, because no one could actually go
19 out. So we proceeded by way of telephone calls. That's how we gave information
20 to each other.

21 Q. [16:00:56] Madam Witness, at paragraph 80 of your statement, page 0025, you
22 said this: "Madam Aya Virginie Touré, who is the national president of the RDR
23 women's group, called me and we talked with my president for Abobo, Madam
24 Maïmouna Touré. We had a meeting at the PDCI headquarters. And we said to
25 ourselves that if we didn't do anything, the Gbagbo forces would kill all our husbands

1 and our children. That meeting was held two days before the meeting." End of
2 quote.

3 A. [16:01:42] That march was before, before March. There was a meeting at the
4 PDCI headquarters with the women from that organisation, because we needed to
5 decide what strategy we would adopt *since our husbands and children were being
6 killed. It wasn't -- there was, you see, there are two Madam Touré.
7 It was the other one, Madam Touré Virginie, who was there with the president,
8 with the national president of the PDCI, Ms Henriette Dao, may she rest in peace,
9 as well as other leaders from PDCI, Dié Bonao, and someone from the MFA,
10 Madam Traoré Pauline, she was also at that meeting, and that was before the
11 march on the 3rd.

12 Q. [16:02:40] Very well.

13 A. [16:02:44] That day I was there and I received a call at about 2 in the afternoon
14 saying that there was *a curfew in Abobo, right in the middle of the day.

15 Q. [16:03:04] How long -- when was that meeting? How long before the march?

16 A. [16:03:08] It wasn't about that march only because, you see, there was killings
17 every day. Our children were being killed every day. We couldn't just stand there
18 like lumps on a log and do nothing. *Men weren't going out anymore. So Madam
19 Touré, Madam Touré Virginie organised a meeting at the PDCI headquarters, and we
20 went there and met there. That was well before the march.

21 Q. [16:03:43] Very well.

22 Your Honour, I can see the time, and of course I leave it to you.

23 PRESIDING JUDGE TARFUSSER: [16:03:49] I was going to stop you.

24 We close here for today, and we will continue tomorrow morning at 9.30. You have
25 another half an hour, more or less. And then the floor goes to the Defence for

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- 1 Mr Blé Goudé. Thank you very much. The hearing is adjourned, tomorrow, 9.30.
- 2 THE COURT USHER: [16:04:16] All rise.
- 3 (The hearing ends in open session at 4.04 p.m.)