1057)

SCSL-04-15-T
(25078 — 25111)

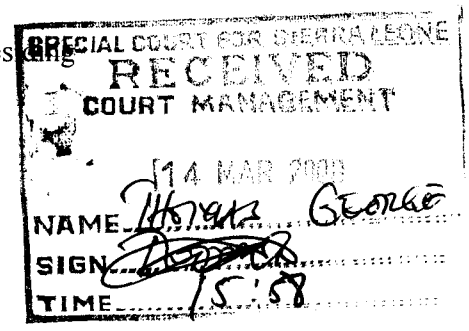
25078

SPECIAL COURT FOR SIERRA LEONE
TRIAL CHAMBER I

Before: Hon. Justice, Benjamin Mutanga Itoe, Presiding
Hon. Justice Bankole Thompson
Hon. Justice Pierre Boutet

Registrar: Mr. Herman Von Hebel

Date filed: 14/03/2008



THE PROSECUTOR **against** **ISSA HASSAN SESAY**
MORRIS KALLON
AUGUSTINE GBAO

Case No. SCSL -2004-15-T

PUBLIC

KALLON MOTION TO EXCLUDE EVIDENCE OUTSIDE THE SCOPE OF THE INDICTMENT WITH CONFIDENTIAL ANNEX A

Office of the Prosecutor:

Peter Harrison
Reginald Fynn

Counsel for Issa Sesay:

Wayne Jordash
Sareta Ashraph

Counsel for Morris Kallon:

Charles Taku
Kennedy Ogetto
Lansana Dumbuya
Tanoo Mylvaganam

Court-Appointed Counsel for Augustine Gbao:

John Cammegh
Scott Martin

I. INTRODUCTION

1. On 13 May 2004, the Prosecutor filed the Corrected Amended Consolidated Indictment against Mr Sesay, Mr Kallon and Mr Gbao.[1] This is the current and only accusatory instrument with which the Accused stand charged.
2. The Prosecution opened its case on 5 July 2004. Since then the Chamber has heard the evidence before it levy a broad range of allegations which have not been pleaded in the Indictment. This has caused, and continues to cause, the clearest prejudice to the Accused in the preparation of his defence and compromises the Court's efforts to achieve a fair and expeditious trial.
3. On 14 February 2008, Mr Kallon filed an application to exceed the page limit in respect of a motion to exclude evidence, falling outside the scope of the Indictment.[2] The Chamber rendered its decision on the Application on 10 March 2008, in which it stated, *inter alia*, that "much of the information contained...[in the draft motion, annexed to the Application,] could have been more clearly presented in an appendix to a Motion of ordinary length."[3] In compliance with that decision, the Defence hereby files a motion to exclude, in part, the evidence of twenty-three Prosecution witnesses, ("the Impugned Evidence"). The evidence is described in Annex A.

II. PRELIMINARY MATTER: THE MOTION IS TIMELY MADE

4. An accused is afforded the right to object to the admission of evidence falling outside the scope of an indictment at any time during trial or appellate proceedings. In recognising the fundamental nature of the accused's right to know the crimes with which he is charged, the jurisprudence *rejects* the notion of waiver. The failure to voice a contemporaneous objection does not waive the accused's rights, but *may* result in a shifting of the burden of proof.[4]

---

[1] *P v. Sesay et al.*, SCSL-04-15-PT, Corrected Amended Consolidated Indictment, ("the Indictment").

[2] *P v. Sesay et al.*, SCSL-04-15-T-985, Public with Confidential Annex Kallon Application for Leave to Make a Motion in Excess of the Page Limit, 14 Feb. 08, ("the Application"); citing, and made in compliance with the Practice Direction on Filing Documents before the Special Court for Sierra Leone ("the Practice Direction"), Art. 6.

[3] *P v. Sesay et al.*, SCSL-04-15-T-1044, Decision on Kallon Application to Make a Motion in Excess of the Page Limit, 10 March 08, at para 10.

[4] *P v. Bagosora et al.*, ICTR-98-41-AR73, Decision on Aloys Ntabakuze's Interlocutory Appeal on Questions of Law Raised by the 29 June 2006 Trial Chamber I Decision on Motion for Exclusion of Evidence, 18 September 2006, ("the *Ntabakuze* Decision"), at para 42; quoting *P. v. Niyitegeka*, ICTR-96-14-A, Judgment, 9 July 04, (the "*Niyitegeka* Appeal Judgment"), 9 July 04, at para 199-200.

5. In the *Ntabakuze* Decision the Appeals Chamber overruled the Trial Chamber to the extent that it found that the burden of proof shifts to the Defence if it fails to interpose an objection at the time the evidence is introduced.[5] An objection or written motion made at any time during the trial can sustain the burden of proof on the Prosecution.[6] In such cases the Prosecution must show that the "accused's ability to prepare his defence was not materially impaired."
6. As the Appeals Chamber explained in the *Ntabakuze* Decision; in cases where a motion to exclude evidence is brought, not at the time the evidence is introduced but nevertheless during proceedings, "the Trial Chamber should determine whether the objection was so untimely as to consider that the burden of proof has shifted from the Prosecution to the Defence." That standard is applicable to the present motion.
7. The rationale behind the law on the shifting burden of proof was articulated by the Appeals Chamber in the *Ntabakuze* Decision. Citing *Kupreskic* it stated:

> "a party should not be permitted to refrain from making an objection to a matter which was apparent during the course of the trial, and to raise it only in the event of an adverse finding against that party."

8. The present motion comes long before any finding on, or evaluation of, the merit of the Impugned Evidence has been made by the Trial Chamber. Therefore, it does not present a situation that was in the contemplation of the Appeals Chamber.
9. It is further submitted that the impact of the Impugned Evidence could only be fully understood at the close of the Prosecution case, in the context of the totality of the Prosecution evidence. This motion is made in reasonable time thereafter. It is submitted that the Prosecution suffers no prejudice from the months intervening the close of its case and the filing of this motion.

III. THE LAW ON PLEADING

Right of the Accused to Be Informed of Material Facts In the Indictment

10. Article 17 of the Statute of the Special Court for Sierra Leone ("the Statute") guarantees the rights of the accused.[7] This Chamber has already recognised that the issue of the sufficiency of the charges is not merely a pleading issue, but ultimately an issue of due process and fair trial rights:

---

[5] The *Ntabakuze* Decision, at para 47.
[6] *Ibid.* at para 42.
[7] See Art 17(4)(a) and (b), and Art 17(2) of the Statute; see also Rule 47(C) of the Rules of Procedure and Evidence of the Special Court for Sierra Leone, ("the Rules").

> "the requirements of due process demand adherence, within the limits of reasonable practicability, to the regime of rules governing the framing of indictments."[8] [Emphasis added]

11. All material facts must be pleaded in a properly constituted indictment. No conviction can be entered against an accused on the basis of material facts which have not been pleaded.[9] Thus, Trial Chamber II has observed that Article 17(4)(a) and Rule 47(C)

> "translate into an obligation on the part of the Prosecution to plead the material facts underpinning the charges with enough detail to inform an accused clearly of the charges against him so that he or she may prepare a defence. . . ."[10] [Emphasis added]

12. The question of whether an accused has received sufficient notice of the evidence adduced against him or her is equivalent to the question of whether an accused received a fair trial. That standard has been abundantly satisfied owing to, *inter alia,* the sheer volume of defects in the Indictment. It is also submitted that, on proper analysis, it is clear that the jurisprudence does give rise to some bright line rules according to which evidence *must* be excluded as outside the scope of the indictment.

Ground 1: The Allegation Cannot be Reasonably Related to the Indictment

13. In the *Ntabakuze* Decision the Appeals Chamber of the ICTR held as follows:

> "The Chamber's approach in the sections which follow may be summarized as follows. Where a material fact cannot be reasonably related to the Indictment, then it shall be excluded."[11] [Emphasis added]

14. Accordingly, the process of 'curing' cannot be invoked to substantially alter the allegations in an indictment.[12] Alterations of this kind can only be made by way amendment of the indictment under Rule 50.[13]

---

[8] *P. v. Kondewa,* SCSL-16-669-PT, Decision And Order On Defence Preliminary Motion For Defects In the Form Of the Indictment (the "*Kondewa* Decision"), at para 6; quoting *P. v. Sesay*, SCSL-04-15-PT, Decision and Order on Defence Preliminary Motion for Defects in the Form of the Indictment, 13 Oct. 03 (the "*Sesay* Decision"), at para 6; see also *P v. Kupreskic et al.*, IT-95-16-A, Judgement, 23 Oct. 01, (the "*Kupreskic* Appeal Judgment"), at para 122, where the Appeals Chamber recognised that the "vagueness of the Amended Indictment . . . constitutes neither a minor defect nor a technical imperfection," but amounted to a "fundamental defect" that "seriously infringed" the defendants' "right to prepare their defence," thereby rendering the trial "unfair".

[9] The *Ntabakuze* Decision, at para 17.

[10] *P. v. Brima et al.*, SCSL-04-16-T, Judgment, 20 June 07, (the "AFRC Judgment"), at para 27; citing *P. v. Blaskic*, IT-95-14-A, Judgment, 29 July 04, (the "*Blaskic* Appeal Judgment"), at para 209.

[11] The *Ntabakuze* Decision, at para 10.

[12] *P v Bagosora et al.*, ICTR-98-41-T, Decision on Nsengiyumva Motion for Exclusion of Evidence Outisde the Scope of the Indictment, 15 Sept. 06, at para 4.

[13] The Appeals Chamber in *Ntakirutimana* indicated that the notification, in anything other than an amended indictment, is insufficient to put an accused on notice of any material facts subsequently discovered through Prosecution investigation. It held that where the material fact is "unknown at the time of the initial indictment, the Prosecution should make efforts through further investigation and seek to amend the indictment at the earliest possible opportunity", *P. v. Ntakirutimana*, ICTR-96-10-A & ICTR-96-17-A,

15. All material facts must be pleaded in an indictment. To the extent that 'curing' is permitted at all, subsequent disclosure of material facts that cannot be "reasonably related" to the indictment does not remedy the defect. Therefore, evidence adduced at trial which cannot be "reasonably related" to the indictment is subject to exclusion.

Ground 2: An Allegation of Physical Perpetration By the Accused is Not Pleaded in the Indictment

16. The jurisprudence has consistently held that acts of physical perpetration by the accused must appear in the indictment. The Appeals Chamber of the ICTR found as such in *Ntakirutimana*:

> "[u]nder Kupreskic criminal acts that were physically perpetrated by the accused personally must be set forth in the indictment."[14]

17. The exception for crimes of large scale, whereby less detail may be acceptable, was intended to accommodate allegations of, for example, mass murder, where ascertaining the names of each alleged victim would either be impossible or would exhaust the investigative resources of the Prosecution.[15] Allegations of single incidences of shooting or rape, for example, committed by an accused personally cannot have been in the contemplation of the Appeals Chamber at the time that it articulated this exception. Reasoning to the contrary would transform the exception into the rule.

18. The obligation to plead allegations of physical perpetration in the indictment extends to the particulars of the alleged crime. As was emphasised by Trial Chamber II in the AFRC Judgment, allegations of physical perpetration give rise to a particularly exigent need for clarity in pleading:

> "[w]here it is alleged that an accused personally carried out the underlying criminal acts in question, the Prosecution is required to set

---

Judgment, 13 Dec. 04, (the "*Ntakirutimana,* Appeal Judgment"), at para 125, (emphasis added).

[14] *Ntakirutimana,* Appeal Judgment, at para 38; see also *P. v. Bagosora et al.*, ICTR-98-41-T, Decision on Ntabakuze Motion for Exclusion of Evidence, 29 June 06, at para 5, ("[a]llegations of physical perpetration of a criminal act by an accused must appear in an indictment"); see also the *Ntabakuze* Decision, at para 33; citing *Kupreškić,* Appeal Judgment, at para 89; see also *P. v. Krnojelac*, IT-97-25-A, Judgment, 17 Sept. 03, (the "*Krnojelac* Appeal Judgment"), at para 132; *Niyitegeka* Appeal Judgment, at para 193; *Ntakirutimana* Appeal Judgment, at para 32; *P. v. Kvocka, et al.*, IT-98-30/1-A, Judgment, 28 Feb. 05, (the "*Kvočka* Appeal Judgment"), at para 28; *P. v. Naletilic,* IT-98-34-A, Judgment, 3 May 06, (the "*Naletilić* Appeal Judgment"), at para 24; *P. v. Ntagerura et al.*, ICTR-99-46-A, Judgment, 7 July 06, (the "*Cyangugu* Appeal Judgment"), para 23; *Sylvestre Gacumbitsi v. The Prosecutor*, ICTR-2001-64-A, Judgment of 7 July 2006 ("*Gacumbitsi* Appeal Judgment"), para 49.

[15] See AFRC Judgment, at para 36; quoting *Kupreskic* Appeal Judgment, at para 89-90.

> out 'with the greatest precision' the identity of the victims, the means by which the acts were committed and the time and place of the events.'"[16]

19. Therefore, it is submitted that allegations of physical perpetration by Mr Kallon must have been pleaded in the Indictment, along with the particulars of the alleged crime, pleaded "with the greatest precision", and that failure to do so must result in the exclusion of any such allegation from the record.

Ground 3: Insufficient Pre-Trial Notice of Material Facts Pertaining to All Other Allegations

(i) All Material Facts Must be Clearly and Specifically Pleaded

20. As explained above the Prosecution is under an obligation to "state the material facts underpinning the charges in the indictment." "Material facts" include the "identity of the victim, the time and place of the events and the means by which the acts were committed", "the nature of the alleged criminal conduct charged," [17] as well as "physical perpetrators"[18] of the events alleged, and "the proximity of the accused to the relevant events,"[19] where physical perpetration of a crime is not alleged against the accused. Evidence adduced during trial which speaks of material facts that have not been correctly pleaded is evidence outside the scope of the indictment and *must* be excluded.

21. Trial Chamber II has denounced the practice of pleading the locations of alleged crimes with words such as "including" or "including but not limited to"[20] and held that "findings of guilt" may not be made "in respect of . . . locations not mentioned in the indictment."[21] It continued that: "the jurisprudence of international criminal tribunals makes it clear that an accused is entitled to know the case against him and is entitled to assume that any list of alleged acts contained in an indictment is exhaustive, regardless of the inclusion of words such as 'including', which may imply that other unidentified crimes in other locations are being charged as well."[22] A finding to the

---

[16] AFRC Judgment, at para 31, citing *Blaskic* Appeal Judgment, at para 213, referring to *P. v. Tadic*, IT-94-1-T, Decision on the Defence Motion on the Form of the Indictment, 14 Nov. 95, at para 11-13.

[17] *P. v. Stanisic*, IT-04-79-PT, Decision on Defence Preliminary Motion on the Form of the Indictment, 19 July 05, at para 5.

[18] *P. v Gatete*, ICTR-00-61-I, Decision on Defence Preliminary Motion, 29 March 04, at para 12-13.

[19] *Id;* see also *P. v. Brima et al*, SCSL-04-16-PT, Decision and Order on Defence Preliminary Motion on Defects in the Form of the Indictment, 1 April 04, at para 29-33.

[20] See, eg, Counts 1-11, 13, 14, and 15-18 of the Indictment.

[21] AFRC Judgment, at para 37; see also *id.*, at para 38, (the Trial Chamber "will not make any findings on crimes perpetrated in locations not specifically pleaded in the Indictment").

[22] *Id.*, at para 37.

contrary would violate the principle that a "specific, precise, clear and unambiguous indictment [is] an essential prerequisite for a fair and expeditious trial."[23]

22. In contemplation of an indictment, identical in every material respect to the Indictment with which Mr Kallon stands charged, Trial Chamber II found that even with "offences of a continuous nature," such as sexual slavery, enslavement or use of child soldiers, "the Prosecution should have pleaded the three continuous crimes with more particularity."[24]

23. Given the scale of some of the crimes alleged, the identity of every victim need not be specifically pleaded. However, the Defence reiterates that the exception for alleged crimes of a 'large scale' must be applied restrictively.[25]

(ii) Material Facts Underpinning Each Alleged Mode of Liability Must be Clearly and Specifically Pleaded

24. Where the Prosecution alleges every mode of participation, as the Indictment does, the material facts necessary to support each of those modes must be pleaded. Thus, the Appeals Chamber in *Kvocka* held:

> "When the Prosecution is intending to rely on all modes of responsibility in Article 7(1), *then the material facts relevant to each of those modes must be pleaded in the indictment.* Otherwise, the indictment will be defective either because it pleads modes of responsibility which do not form part of the Prosecution's case, or because the Prosecution has failed to plead material facts for the modes of responsibility it is alleging."[26] [Emphasis added]

25. The Appeals Chamber in *Blaskic* set forth with specificity the standard for pleading command responsibility under Article 6(3) of the Statute.[27]

26. Thus, the jurisprudence establishes that an accused is afforded the right to be put on notice of the material facts which will be used by the Prosecution to prove each mode of liability pleaded. Evidence seeking to establish such material facts, which has not been pleaded, is outside the scope of the indictment must be excluded.

---

[23] *P. v. Zigiranyirazo*, ICTR-2001-73-I, Decision on the Defence Preliminary Motion Objecting to the Form of the Amended Indictment, 15 July 04.

[24] *Id.*, at para 40. Note that the AFRC Trial Chamber did not rule as to the pleadings regarding the "continuous crimes" because no objections were made as to them, AFRC Judgment, at para 41.

[25] See para 17, *supra*.

[26] *Kvocka* Appeal Judgment, at para 29; see also *id.*, at para 41; *Ntakirutimana* Appeal Judgment, at para 125; and the *Ntabkuze* Decision, at para 33; *Krnojelac* Appeal Judgment, at para 138.

[27] *Blaskic* Appeal Judgment, at para 218; see also *Cyangugu* Appeal Judgment, at para 152; and *id.*, at para 158, ("[t]he Prosecution seems to consider mere mention of Article 6(3) to be the key to a conviction under this

(iii) Derogation from the Rules: 'Curing' a Defective Indictment is Only Permitted in "Exceptional" Circumstances

27. This Chamber made known its view on the state of the law in the area by emphasising the importance of pleading the case against the Accused *in the Indictment* and, thereby, apparently rejecting of the notion of 'curing' a defective indictment:

> "This court will not look at the [pre-trial briefs]..., it will look at the charge and the evidence which has been adduced not necessarily what has been stated in the trial briefs. The trial briefs are just statements which come from the parties, and, if they are not proven, I'm afraid the court will not go by them."[28] [Emphasis added]

28. The position taken by the Chamber that the indictment is the only pleading instrument capable of putting an accused on notice of the charges which he faces is fully endorsed by the Defence. However, out of an abundance of caution, it is acknowledged that some recent decisions on the issue of pleading have held that a defective indictment can, *in exceptional cases only,*[29] be 'cured' by subsequent disclosure. It is clear that this represents a derogation from the absoluteness of the rule[30] on pleading in indictments and, it is submitted, should be applied *restrictively* and with *full respect for the rights of the accused to a fair trial.* As explained above, there is *no* provision for 'curing' where an allegation cannot be "reasonably related" to the indictment[31] or for an allegation of physical perpetration against an accused.[32]

29. It is submitted that evidence adduced at trial which has not been pleaded in compliance with the aforementioned principles is subject to exclusion.

Ground 4: The Evidence is Not Relevant to Any Charge in the Indictment

30. Evidence which does not tend to prove or disprove anything in the indictment is irrelevant and, whether admitted or not, will not be considered by the Chamber in its ultimate evaluation of whether the counts of an indictment have been proven by the

---

Article. The Appeals Chamber cannot but denounce this approach) [emphasis added].

[28] T. 29/01/08, pg 24, line 1-10, *per* Justice Itoe.

[29] *Ntabakuze* Decision, at para 21, ("in light of the factual and legal complexities normally associated with the crimes within the jurisdiction of this Tribunal, there can only be a limited number of cases that fall within that category"); quoting *Kupreškić* Appeal Judgment, para 114; see also *Cyangugu* Appeal Judgment, para 114; *P. v. Muhimana*, ICTR-95-1B-T, Judgment, 28 April 05, at para 452, (given the factual and legal complexity of the crimes tried at the *ad hoc* tribunals, "few Indictments with material defects are likely to be cured by information given to the Defence outside the Indictment").

[30] Note that the Statute and Rules provide the Indictment as the only accusatory instrument and that no mechanism for the 'curing' of a defective indictment is established therein. This was observed by the Appeals Chamber of the ICTR, *Cyangugu* Appeal Judgment, at para 29.

[31] See Ground 1, para 13-15, *supra.*

[32] See Ground 2, para 16-19, *supra.*

Prosecution beyond reasonable doubt. Therefore, it is submitted that, consistent with Rule 89(B), improperly admitted evidence of this sort is properly remedied by the Chamber through the exclusion of such evidence and that adopting such an approach would "best favour a fair determination of the matter before it".[33]

31. Furthermore, in discharging the duties of diligence and competence owed by defence counsel to their client, a defence case must answer *all* the allegations in the record. In its endeavours to do so the Defence will be obliged to investigate and present a case in response to allegations that ultimately will not be considered by the Chamber in its final determination of the evidence properly before it. This serves to exhaust the resources of the Defence and the Court and to prejudice the efforts of all parties to achieve a fair and expeditious trial, as required by Article 17(2) and Article 17(4)(e).

IV. PREJUDICE TO THE ACCUSED

32. The question of whether an accused receives a fair trial is integral to an inquiry into the sufficiency of pleading.[34] It is submitted that there is no possibility that the Accused can receive a fair trial with the evidence left in the record.[35] It is established law that a constantly shifting Prosecution case, which moulds itself according to the evidence which is adduced, contravenes the pleading requirements in a criminal trial and is inconsistent with the fundamental rights of the accused.[36]

33. It is further submitted that, notwithstanding any potential 'curing' of the Indictment, the Accused's right to a fair trial has been compromised by the sheer volume of defects that the current indictment suffers from. The extent to which the case against the Accused has metamorphosed over the course of the trial, whether on a case-by-case basis the defects are deemed to have been 'cured' or not, serves to exhaust the resources of the defence in a manner which is clearly prejudicial to the Accused. In

---

[33] See Rule 89(B) of the Rules.

[34] See the *Ntabakuze* Decision, at para 23; quoting *Naletilić* Appeal Judgment, para 26; see also *Kvočka* Appeal Judgment, para 33; *Cyangugu* Appeal Judgement, para 28.

[35] See *Krnojelac* Appeal Judgment, at para 130 and 139, where the Appeals Chamber suggested in that inadequate pleading and notice also violates the defendant's right "to have adequate time and facilities for the preparation of his defence"; suggesting *Kupreskic* Appeal Judgment, at para 100, ("the goal of expediency should never be allowed to over-ride the fundamental rights of the accused to a fair trial").

[36] *Krnojelac* Appeal Judgment, at para 117. Note also that with the commencement of his defence case approaching the Accused is currently contemplating whether or not to testify. Under the circumstances he is being compelled to make that decision without knowing the precise nature of the Prosecution's case. This is a clear violation of the Accused's right against self-incrimination, since he may incriminate himself in respect of allegations which are not laid out in the Indictment.

contemplation of this issue in the *Ntabakuze* Decision, the Appeals Chamber held as follows:

> "The Appeals Chamber agrees that when the indictment suffers from numerous defects, there may still be a risk of prejudice to the accused even if the defects are found to be cured by post-indictment submissions. In particular, the accumulation of a large number of material facts not pled in the indictment reduces the clarity and relevancy of that indictment, which may have an impact on the ability of the accused to know the case he or she has to meet for purposes of preparing an adequate defence. Further, while the addition of a few material facts may not prejudice the Defence in the preparation of its case, the addition of numerous material facts increases the risk of prejudice as the Defence may not have sufficient time and resources to investigate properly all the new material facts. Thus, where a Trial Chamber considers that a defective indictment has been subsequently cured by the Prosecution, it should further consider whether the extent of the defects in the indictment materially prejudice an accused's right to a fair trial by hindering the preparation of a proper defence."[37]

34. Although the Defence strongly disputes the veracity of the Impugned Evidence, it clearly speaks of improper conduct. Leaving improperly admitted evidence such as this in the trial record creates great prejudice against the Accused. It is submitted that it is in the interests of justice that these allegations are removed from the record so as not to affect the just evaluation by the Chamber of the evidence properly before it at the conclusion of this trial.

V. PRAYER

35. In light of the foregoing, it is respectfully prayed that the Chamber:

i. **GRANT** the motion and

ii. **EXCLUDE** and **DISREGARD** the Impugned Evidence..

DONE in Freetown on this 14th day of MARCH, 2008.

For Defendant **Kallon,**

Chief Charles A. Taku

---

[37] *Ntabakuze* Decision, at para 26; see also *Cyangugu* Appeal Judgment, para 114.

SPECIAL COURT FOR SIERRA LEONE
JOMO KENYATTA ROAD • FREETOWN • SIERRA LEONE
PHONE: +39 0831 257000 or +232 22 297000 or +39 083125 (+Ext)
UN Intermission 178 7000 or 178 (+Ext)
FAX: +232 22 297001 or UN Intermission: 178 7001

Court Management Section – Court Records

CONFIDENTIAL DOCUMENT CERTIFICATE

This certificate replaces the following confidential document which has been filed in the ***Confidential*** Case File.

Case Name: The Prosecutor – v- Sesay, Kallon & Gbao
Case Number: SCSL-2004-15-T
Document Index Number: 1057
Document Date 14th March, 2008
Filing Date: 14th, March, 2008 at 15:58
Number of Pages: 9
Page Numbers: **25088 to 25111**
Document Type: -

- ☐ Affidavit
- ☐ Indictment
- ☐ **Motion**
- ☐ Order
- ☐ Other
- ☐ Reply
- ☐ Response
- ☐ Application

Document Title: **Kallon Motion To Exclude Evidence Outside The Scope Of The Indictment With Confidential Annex A**

Name of Officer:

Thomas George

Signed: