456) SCSL-03-01-T (16572-16592) 16572

THE SPECIAL COURT FOR SIERRA LEONE

In Trial Chamber II

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

Registrar: Mr. Herman von Hebel

Date: 4 April 2008

Case No.: SCSL-2003-01-T

SPECIAL COURT FOR SIERRA LEONE
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THE PROSECUTOR

–v–

CHARLES GHANKAY TAYLOR

PUBLIC, WITH CONFIDENTIAL ANNEX

DEFENCE OBJECTION TO PROSECUTION NOTICE UNDER RULE 92*bis* FOR THE ADMISSION EVIDENCE RELATED TO *INTER ALIA* KENEMA DISTRICT

Office of the Prosecutor
Ms. Brenda J. Hollis
Ms. Leigh Lawrie

Counsel for Charles G. Taylor
Mr. Courtenay Griffiths Q.C.
Mr. Terry Munyard
Mr. Andrew Cayley
Mr. Morris Anyah

I. Introduction

1. On 29 February 2008, the Prosecution filed a Notice[1] under Rule 92*bis* of its intention to seek admission of the prior trial transcripts and related exhibits of the testimony of witnesses TF1-060, TF1-062, TF1-122 and TF1-125 ("the Witnesses") in other proceedings before the Special Court for Sierra Leone.
2. In March 2008, the Defence made an oral application for an extension of time to file any potential Objection. The Prosecution did not object, and the Trial Chamber granted the Defence leave until 4 April 2008 to file this Objection.
3. The Witnesses are characterized by the Prosecution as "Core Predominately Crime Base Witnesses" in its Amended Witness List filed on 7 February 2008.[2] The Prosecution submits that their evidence is relevant because it concerns *inter alia* crimes committed in Kenema during the Indictment period, specifically including evidence of unlawful killings, forced labour, and the use of child soldiers.[3] Additionally, the Witnesses will provide evidence on the RUF command structure, the AFRC/RUF command structure, and the relationship between the RUF and AFRC during the Indictment period, which the Prosecution claims are relevant to the several forms of liability alleged by the Prosecution in this case.[4]
4. Rule 92*bis*(A) specifically prohibits the admission of evidence that goes to proof of the acts and conduct of the accused. Furthermore, jurisprudence has determined that where information goes to a critical element of the Prosecution's case, it is proximate enough to the Accused so as to require cross-examination, which a Chamber may, in its discretion, order.[5] However, the Prosecution have not offered to make any of the Witnesses available for cross-examination.
5. The Defence file this Objection to the admission of the prior testimony and related exhibits of witnesses TF1-060, TF1-062, TF1-122 and TF1-125 under Rule 92*bis*, on the following bases. Some of the information is not relevant because it falls outside the Indictment period. Other evidence is purely the Witnesses' opinion or is conclusory. More importantly, some of the information is "linkage" in nature and/or goes to proof of the acts

[1] *Prosecutor v. Taylor*, SCSL-03-01-T-429, Prosecution Notice Under Rule 92*bis* for the Admission of Evidence Related to *Inter Alia* Kenema District, 29 February 2008 ("Notice").
[2] *Prosecutor v. Taylor*, SCSL-03-01-T-410, Prosecution's Amended Witness List, 7 February 2008 ("Amended Witness List").
[3] Notice, para. 15.
[4] Notice, para. 18.
[5] See Notice, para. 15, and cases cited therein.

and conduct of the accused, which cannot be allowed under Rule 92*bis* absent the opportunity for cross-examination. Thus, the Prosecution should have made its application under Rule 92*ter*, which, with the consent of the parties, would allow for the admission of written statements that go to proof of the acts and conduct of the accused and/or his alleged subordinates, since it would also ensure that the witness is present for cross-examination.

5. Therefore, if the Trial Chamber does not deny the admission of the prior transcripts and related exhibits completely under Rule 92*bis*, the Defence request, in the alternative, that only those portions of the Witnesses' prior testimony and related exhibits that are not objected to in Annex A be admitted into evidence, or that the Court, in its discretion, order the Prosecution to ensure, for purposes of fairness, that witnesses TF1-060, TF1-062, TF1-122 and TF1-125 will appear for cross-examination.

7. Furthermore, whether the witnesses' evidence will be tendered through Rule 92*bis*(A) with cross-examination, through Rule 92*ter* with cross-examination, or completely live, the Defence hereby include in its Objection a timely[6] application[7] to rescind the closed session protective measures orally granted to witnesses TF1-060 and TF1-125 in the RUF case, because there is no indication that they are still necessary.[8] However, pursuant to Rule 75(F), these closed session protective measures continue to apply *mutatis mutandis* to these witnesses in the Taylor case, unless and until they are rescinded by Trial Chamber II (as the Chamber seized of the second proceedings), in consultation with Trial Chamber I as per Rule 75(H).

II. Legal Basis and Submissions

[6] The Presiding Judge recently commented that the testimony of TF1-362 would have to proceed in closed session because the Defence had not made a "timely application" to vary or rescind orders previously made by Trial Chamber I in regard of that witness's testimony. Thus the Presiding Judge was "reluctantly" bound to proceed in closed session. See Taylor Trial Transcript, 27 February 2008, pg. 4797, lns. 6-10.

[7] The Defence recognize that typically an application to modify or rescind protective measures will be done in a separate Motion. However, for purposes of efficiency and so that all trial-related issues related to these witnesses can be resolved comprehensively, the Defence include this application in its Objection. The Prosecution is not disadvantaged in this regard – whether in its Reply to this Objection or in a Response to a separate Defence motion, the Prosecution would only have one opportunity to comment on the application. If the Prosecution deem it necessary, the Defence would not oppose an oral request for a full ten days to file its Reply and/or a reasonable extention of the filing page limit in order to fully consider this application.

[8] See Notice, Confidential Annex A. The Prosecution indicates that all four Witnesses were granted general pre-trial protective measures in *Prosecutor v. Sesay, Kallon, Gbao*, SCSL-04-15-T-180, Decision on Prosecution Motion for Modification of Protective Measures for Witnesses, 5 July 2004. Additionally, the Prosecution suggests that TF1-060 and TF1-125 were granted closed session protective measures. However, the Defence cannot find the decision or reference where TF1-125 was initially granted closed session protection – the transcript itself indicates that the witness decided to give testimony in Open Session.

8. At the outset, the Defence note that the admission of a prior transcript of a witness does not necessarily include exhibits and other documents related to the transcript,[9] so the Defence has also made specific objections to related exhibits in Annex A.

Application Should Have Been Made Under Rule 92ter

9. Because the Prosecution application includes information directly related to proof of the acts and conduct of the accused,[10] it should have been brought under Rule 92*ter*, which requires the agreement of the parties and requires that the witness be present for cross-examination. Rule 92*ter* states:

> With the agreement of the parties, a Trial Chamber may admit, in whole or in part, the evidence of a witness in the form of a written statement or a transcript of evidence given by a witness in proceedings before the Tribunal, under the following conditions:
>
> (i) the witness is present in court;
>
> (ii) the witness is available for cross-examination and any questioning by the Judges; and
>
> (iii) the witness attests that the written statement or transcript accurately reflects that witness' declaration and what the witness would say if examined.

10. Only if there is no agreement between the parties, or if there is genuinely no information that goes to proof of the acts or conduct of the accused should an application be made under Rule 92*bis*.

Objection Under Rule 92bis

11. Rule 92*bis*(A) states, "In addition to the provisions of Rule 92*ter*, a Chamber may, in lieu of oral testimony admit as evidence, in whole or in part, information including written statements and transcripts, that do not go to proof of the acts and conduct of the accused". Rule 92*bis*(B) adds the further requirements that the information submitted must be reliable and susceptible of confirmation.

12. The prohibition on admission of information going to proof of the acts and conduct of the accused has been clearly expounded by both of the international criminal tribunals and has been affirmed in other Special Court decisions. For the most part, the phrase, "acts and conduct of the accused" should be given its ordinary meaning: deeds and behaviour of the

[9] *Prosecutor v. Martic*, IT-95-11-T, Decision on Prosecution's Motions for Admission of Transcripts Pursuant to Rule 92 bis and of Expert Reports Pursuant to Rule 94 bis, 13 January 2006, para. 47.
[10] See Annex A.

accused.[11] In *Prosecutor v. Galic,* the ICTY Appeals Chamber sets out various examples of what should be considered the acts and conduct of an accused, including:[12]

- That the accused **committed** (that is, that he personally physically perpetrated) any of the crimes charged himself, or
- That he **planned, instigated or ordered** the crimes charged, or
- That he otherwise **aided and abetted** those who actually did commit the crimes in their planning, preparation or execution of those crimes, or
- That he was a **superior** to those who actually did commit the crimes, or
- That he **knew or had reason to know** that those crimes were about to be or had been committed by his subordinates [relevant state of mind], or
- That he **failed to take reasonable steps to prevent** such acts or to punish those who carried out those acts [omission to act], or
- That he **participated in a joint criminal enterprise**, or
- That he shared with the person who actually did commit the crimes charged the **requisite intent** for those crimes (as part of a Joint Criminal Enterprise).

13. Please see attached in Annex A those portions of the transcript which contain information going to proof of the acts and conduct of the accused which must not be admitted under Rule 92*bis*.

14. Special Court jurisprudence also specifically recognizes that a separate consideration for admission under Rule 92*bis* is whether admission of certain information would unfairly prejudice the opposing party,[13] because in fairness it is too closely linked to the acts and conduct of the accused to be admitted without the opportunity for cross-examination.

15. The Defence agree that the acts and conduct of an alleged subordinate of Mr. Taylor[14] cannot be equated with the acts and conduct of Mr. Taylor himself, and therefore may be admissible – but only if cross-examination of the witness is possible.[15] The Special Court

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[11] *Prosecutor v. Milosevic,* ICTY-02-54-T, Decision on Prosecution's Request to Have Written Statements Admitted Under Rule 92*bis*, 21 March 2002, para. 22.

[12] *Prosecutor v. Galic,* ICTY-98-29-AR73.2, Decision on Interlocutory Appeal Concerning Rule 92*bis*(C), 7 June 2002, paras. 10 and 11 ("Galic 92*bis* Appeals Decision") (emphasis added) (copy provided with Prosecution Notice).

[13] *Prosecutor v. Sesay, Kallon, Gbao,* SCSL-04-15-T-1049, Decision on Defence Application for the Admission of the Witness Statement of DIS-129 Under Rule 92*bis*, or in the Alternative, Under Rule 92*ter,* 12 March 2008, pg. 2 ("Sesay 92*bis* Decision"), citing *Prosecutor v. Norman, Fofana, Kondewa,* SCSL-04-14-T-447, Decision on Prosecutor's Request to Admit into Evidence Certain Documents Pursuant to Rules 92*bis* and 89(C), 14 July 2005, pg. 4 ("CDF 92*bis* Decision"). See also *Prosecutor v. Sesay et al,* SCSL-2004-15-T-559, Decision on Prosecutor's Notice Under Rule 92 *bis* to Admit the Transcripts of Witness TF1-334, 23 May 2006, pg. 3 ("RUF 92*bis* Decision").

[14] For purposes of this Objection, and based generally on Prosecution allegations, the following non-exhaustive list of personalities should be considered "subordinates" of Mr. Taylor: Foday Sankoh, Sam Bockarie, Issa Sesay, Morris Kallon, Augustine Gbao, Johnny Paul Koroma, Alex Tamba Brima, Brima Bazzy Kamara, Santigie Borbor Kanu, Benjamin Yeaten, Ibrahim Bah, Daniel Tamba Jungle, Eddie Kanneh, and Zig Zag Marzah.

[15] For instance, TCI has determined that a witness' testimony that he was released from custody by soldiers after they received a letter from Superman ordering the soldiers to stop the killing is evidence **regarding the acts and conduct of others** who committed the crimes for which the Accused [Gbao] is alleged to be responsible and **not**

has previously determined that acts of co-perpetrators or subordinates of the accused is relevant in determining if cross-examination should be allowed, but not in determining if a document should be admitted under Rule 92*bis*.[16] Thus, there remains a distinction between (a) acts and conduct of those others who commit the crimes for which the indictment alleges that the accused is individually responsible, and (b) the acts and conduct of the accused as charged in the indictment which establish his responsibility for the acts and conduct of those others.[17] The first is admissible under Rule 92*bis*, the latter is not. Significantly, the **proximity** of the acts and conduct of the alleged subordinate to the accused, as described in the evidence sought to be admitted, is relevant to this determination.[18]

16. Specifically, the Special Court has held that where a witness statement contains information "material to the command responsibility and joint criminal enterprise allegations in the Indictment", that information goes to a "critical element of the Prosecution's case" and is therefore "proximate enough to the Accused so as to require cross-examination", as is the Trial Chamber's discretion to order under Rules 26*bis* and 54.[19] This is simply, but crucially, a matter of fairness.[20] The ICTY has noted that there is only a "short step" from a finding that the acts constituting the crimes charged were committed by a subordinate to finding that the accused knew or had reason to know that those crimes were being committed by them.[21]

17. Through the admission of witnesses TF1-060, TF1-062, TF1-122 and TF1-125's prior testimony and related exhibits, and without offering to make the Witnesses available for cross-examination, the Prosecution is improperly attempting to introduce into evidence of the acts and conducts of alleged subordinates of Mr. Taylor.[22] Based on Mr. Taylor's statutory right to a fair trial, this can not be allowed. If the Witnesses are not available for

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evidence of the acts and conduct of the accused which establish his responsibility for the acts and conduct of others. However, this testimony was only admitted because the witness was available for cross-examination. RUF 92*bis* Decision.

[16] CDF 92*bis* Decision, pg. 4.

[17] See Galic 92*bis* Appeals Decision, para. 9.

[18] Galic 92*bis* Appeals Decision, para. 13; *Prosecutor v. Martic*, ICTY-95-11-T, Decision on Prosecution's Motions for Admission of Transcripts Pursuant to Rule 92*bis* and of Expert Reports Pursuant to Rule 94*bis*, 13 January 2006, para. 20.

[19] Sesay 92*bis* Decision, pgs. 1, 3.

[20] Galic 92*bis* Appeals Decision, para. 15; *Prosecutor v. Martic*, ICTY-95-11-T, Decision on Prosecution's Motions for Admission of Written Evidence Pursuant to Rule 92 bis of the Rules, 16 January 2006, paras. 29, 33.

[21] Galic 92*bis* Appeals Decision, para. 14.

[22] For instance, the Witnesses make allegations that Sam Bockarie, Mosquito, was in control of Tongo Fields, including the Cyborg Pit, during the Indictment Period.

cross-examination, then the portions objected to in Annex A on this basis can not be admitted into evidence.

The Evidence is Not Entirely Relevant

18. Of course, all information tendered into evidence must be relevant under Rule 89(C). The Second Amended Indictment[23] against Mr. Taylor only includes three charges for crimes allegedly committed in Kenema District, during limited time frames: Unlawful Killings between about 25 May 1997 and about 31 March 1998;[24] the use of Child Soldiers between 30 November 2006 and about 18 January 2002;[25] and Abductions and Forced Labor between about 1 July 1997 and about 28 February 1998.[26]

19. Thus, any allegations included in the Witnesses' prior transcripts and related exhibits to burning, sexual violence, and looting should be excluded from admission under Rule 92*bis*.[27]

Previously Granted Closed Session Protective Measures Should Be Rescinded

20. Witnesses TF1-060[28] and TF1-125[29] were partially granted closed session Protective Measures in the RUF trial in April and May 2005, respectfully. Neither of the two witnesses gave evidence completely in closed session. Furthermore, since the oral application for closed session made during trial in 2005, the Prosecution has not indicated whether the witnesses would still require such measures if required to appear for cross-examination in the Taylor case.

21. It is established that closed session is an extreme security measure that is resorted to only when it is absolutely necessary to do so. In *Tadic*, the ICTY determined that:

> "...**[A]ny measures taken should be strictly necessary**. If a less restrictive measure can secure the required protection, that measure should be applied. The

[23] *Prosecutor v. Taylor*, SCSL-03-01-PT-263, Prosecution's Second Amended Indictment, 29 May 2007.
[24] Second Amended Indictment, para. 10.
[25] Second Amended Indictment, Count 9.
[26] Second Amended Indictment, para. 24.
[27] See specific examples in Annex A.
[28] *Prosecutor v. Sesay, Kallon, Gbao*, Trial Transcript, 29 April 2005, pg. 62, ln. 1 – pg. 63, ln. 5. The beginning of the witness' testimony was in Open Session, and the application for closed session was only made about half-way through the testimony.
[29] See *Prosecutor v. Sesay, Kallon, Gbao*, Trial Transcript, 12 May 2005, pg. 93, ln. 23 – pg. 94, ln. 26 and *Prosecutor v. Sesay, Kallon, Gbao*, Trial Transcript, 16 May 2005, pg. 35, ln. 4 – pg. 43, ln. 5. Based on the discussion between counsel and the judges in the transcript, it is clear that Witness TF1-125 had previously been granted protective measures, but that he decided to testify openly. The only portion that was heard in closed session was for a limited time during questioning by Defence counsel on a specific topic.

International Tribunal must be satisfied that the accused suffers no undue avoidable prejudice, although some prejudice is inevitable".[30] (emphasis added)

22. This Chamber recently reaffirmed this principle and set forth a clear three-prong test, stating:

> "...[I]n granting protective measures to witnesses and victims, the Trial Chamber has a duty to balance the protection of those victims and witnesses with the rights of the Accused to a fair and public trial and that the **extraordinary measure** of closed session testimony will only be granted where it is clearly demonstrated (a) that there is a real and specific risk to the witness and/or his family, (b) that the right of the Accused to a fair and public trial is not violated, and (c) that no less restrictive measures can adequately deal with the witness's legitimate concerns".[31]

The Prosecution Has Not Shown that There Still Exists a Real and Specific Risk to Witnesses TF1-060 and TF1-125

23. The burden of justifying the protection of witnesses lies on the party seeking such protection.[32] Additionally, the subjective fear of a witness is insufficient to justify special protective measures without any objective considerations.[33]

24. In this instance, the Defence aver that the orders for closed session testimony for these witnesses, which were granted almost three years ago, have in essence expired, unless the Prosecution can show otherwise. Even if it were accepted that witness TF1-060 and TF1-125 once faced threats that were real and specific, the Prosecution has not submitted any recent material to prove that currently there are any real or specific risks to the witnesses and/or their families. The Defence note that the operation of protective measures prevents it from thoroughly investigating the current circumstances of this witness to ascertain whether the prevailing order for protective measures is still warranted. Only the Prosecution is in a position to do so. Absent that information from the Prosecution, for consideration by the Trial Chamber, the order for protective measures must be rescinded.

Closed Session Testimony Infringes on the Accused's Right to a Fair and Public Trial

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[30] *Prosecutor v. Tadic*, IT-94-1, Decision on the Prosecution's Motion Requesting Protective Measures for Victims and Witnesses, 10 August 1995, para. 66. See also, *Prosecutor v. Bagosora*, No. ICTR-98-41-AR73, Decision on Interlocutory Appeals of Decision on Witness Protection Orders, 6 October 2005, para. 19.
[31] *Prosecutor v. Taylor*, SCSL-03-01-T-427, Decision on Confidential Prosecution Motions SCSL-03-01-T-372 and SCSL-03-01-T-385 for the Testimonies of Witnesses to be Held in Closed Session, 26 February 2008, pg. 6 ("Closed Session Decision").
[32] *Prosecutor v. Bizimungu et al*, No. ICTR-99-50-T, Decision on Prosper Mugiraneza's Motion for Protection of Defence Witnesses, 2February 2005, para. 13.
[33] *Prosecutor v. Nyiramasuhuko et al*, No. ICTR-98-42-T, Decision on Nyiramasuhuko's Strictly Confidential Ex Parte Under Seal Motion for Additional Protective Measures for Some Defence Witnesses, 1 March 2005, para. 26.

25. According to Rule 78, the preference at the Special Court is for public hearings and open session testimony. This preference is also clear from the rights granted to the Accused in Article 17(2) of the Statute. The right to a public hearing may be only be infringed by the "need to guarantee the utmost protection and respect for victims and witnesses".[34]

26. One of the essential components of a fair trial is the Defence's ability to investigate allegations against the Accused in an effective manner. Article 17(4)(e) of the Statute affords the Accused the right to "examine, or have examined, the witnesses against him". The practical realities of hearing witness testimony in closed session however is that the Defence's ability to effectively investigate the witness as well as the content of the witness' testimony is severely restricted. Thus, counsel are not able to comprehensively obtain information with which to cross-examine the witnesses called to testify against Mr. Taylor.[35]

27. Because of the impact on the Accused's rights to a fair and public hearing, which includes the right to conduct thorough investigations, the use of closed session should remain an "extraordinary measure",[36] and should only be granted if less restrictive measures are not sufficient.

Prosecution Has Recourse to Other Less Restrictive Measures that Could Adequately Deal with the Witnesses' Legitimate Concerns, If Any

28. The Defence further avers that, especially considering the time that has lapsed since the current orders for closed session for Witnesses TF1-060 and TF1-125 were granted, these orders can now be rescinded without material prejudice to the witnesses, as the Prosecution has recourse to other less restrictive measures. Absent an indication from the Prosecution

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[34] *Prosecutor v. Sesay, Kallon, Gbao*, SCSL-04-15-T-180, Decision on Prosecution Motion for Modification of Protective Measures for Witnesses, 5 July 2004, paras. 33-34.

[35] See *Prosecutor v. Taylor*, SCSL-03-01-T-413, Defence Response to the Public Prosecution Motion for Additional Protective Measures for the Trial Proceedings of Witnesses TF1-515, 516, 385, 539, 567, and 390, 8 February 2008, paras. 13-17. Also, contrary to what the Prosecution insinuates, the Accused himself does not know nor have knowledge of the majority of the linkage and crime base witnesses the Prosecution is calling against him. Thus, his ability to contribute investigative leads to the Defence team is limited. See *Prosecution v. Taylor*, SCSL-03-01-T-418, Reply to Defence Response to Prosecution Motion for Additional Protective Measures for the Trial Proceedings of Witnesses TF1-515, 516, 385, 539, 567, 388 and 390, 14 February 2008, para. 12.

[36] *Prosecutor v. Sesay, Kallon, Gbao*, SCSL-04-15-T-577, Decision on Prosecution Motion for the Testimony of Witnesses TF1-367, TF1-369, TF1-371 to be held in Closed Session and for other Relief of Witness TF1-369, 14 June 2006, pg. 5.

that it has given "full and exhaustive consideration" to less restrictive witness protection measures available under Rule 75(B)(i)(c),[37] the orders must therefore be rescinded.

29. If additional protective measures are still needed for the Taylor trial, the Defence invites the Prosecution to make a fresh application, or to propose an alternative arrangement, taking into consideration the intervening almost three years since the initial applications were granted and the current mindset and circumstances of the witness.

III. Conclusion

30. The Defence request that the Trial Chamber:

(A) Dismiss the Prosecution Notification in its entirety, since it should have been filed under Rule 92*ter;* or

(B) Alternatively, only admit into evidence those portions of witnesses TF1-060, TF1-062, TF1-122 and TF1-125's prior testimony or related exhibits that are not objected to in Annex A.

31. However, if the Trial Chamber admits the objectionable portions of witnesses TF1-060, TF1-062, TF1-122 and TF1-125's testimony and related exhibits, the Defence request that the Trial Chamber:

(A) Order the Prosecution to make the Witnesses available for cross-examination; and

(B) Rescind the closed session protective measures previously granted to Witnesses TF1-060 and TF1-125 in the RUF Trial.

Respectfully Submitted,

pp Silas Chekera

for Courtenay Griffiths Q.C.

Lead Counsel for Charles G. Taylor

Dated this 4th Day of April 2008

The Hague, The Netherlands.

[37] Closed Session Decision, pg. 6.

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Prosecutor v. Nyiramasuhuko et al, No. ICTR-98-42-T, Decision on Nyiramasuhuko's Strictly Confidential Ex Parte Under Seal Motion for Additional Protective Measures for Some Defence Witnesses, 1 March 2005

SPECIAL COURT FOR SIERRA LEONE
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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- Charles Ghankay Taylor**
Case Number: **SCSL-03-01-T**
Document Index Number: **456**
Document Date **04 April 2008**
Filing Date: **04 April 2008**
Document Type: **- Confidential Annex A**

Number of Pages **9** Page Numbers from: **16584-16592**

☐ Application
☐ Order
☐ Indictment
☒ Other
☐ Motion
☐ Correspondence

Document Title:

PUBLIC WITH CONFIDENTIAL ANNEX A – DEFENCE OBJECTION TO PROSECUTION NOTICE UNDER RULE 92 BIS FOR THE ADMISSION EVIDENCE RELATED TO *INTER ALIA* KENEMA DISTRICT

Name of Officer:

Vincent Tishekwa

Signed: