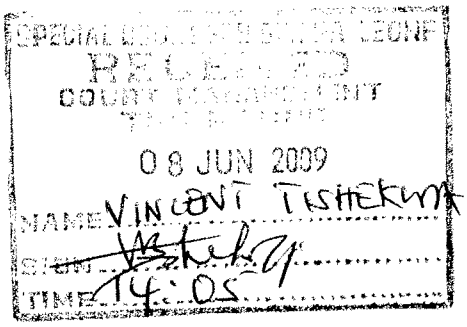
787) SCSL-03-01-T (25398 – 25428) 25398

SPECIAL COURT FOR SIERRA LEONE
OFFICE OF THE PROSECUTOR
Freetown – Sierra Leone

APPEALS CHAMBER

Before:	Justice Renate Winter, Presiding Justice Jon M. Kamanda Justice George Gelaga King Justice Emmanuel Ayoola Justice Shireen Fisher
Acting Registrar:	Ms. Binta Mansaray
Date filed:	8 June 2009



THE PROSECUTOR **Against** **Charles Ghankay Taylor**

Case No. SCSL-03-01-T

PUBLIC

PROSECUTION RESPONSE TO "PUBLIC WITH ANNEXES A, B AND C DEFENCE NOTICE OF APPEAL AND SUBMISSIONS REGARDING THE 4 MAY 2009 ORAL DECISION REQUIRING THE DEFENCE TO COMMENCE ITS CASE ON 29 JUNE 2009"

Office of the Prosecutor:
Ms. Brenda J. Hollis
Mr. Nicholas Koumjian
Ms. Kathryn Howarth

Counsel for the Accused:
Mr. Courtenay Griffiths Q.C.
Mr. Andrew Cayley
Mr. Terry Munyard
Mr. Morris Anyah
Mr. Silas Chekera

I. INTRODUCTION

1. The Prosecution opposes the *"Public with Annexes A, B and, C Defence Notice of Appeal and Submissions Regarding the 4 May Oral Decision Requiring the Defence to Commence its Case on 29 June 2009"*("Appeal").[1]

2. The five grounds of appeal raised by the Defence are without merit and should be dismissed, and the relief requested should be denied. The majority of the Trial Chamber ("majority") did not err in fact or in law, or abuse its discretion in setting the start date of the Defence case for 29 June 2009. The majority decision falls squarely within the legitimate ambit of the Trial Chamber's broad discretion in the exercise of its case management function.

II. BACKGROUND

3. The issue of the start date for the Defence case was initially raised before the Trial Chamber on 9 February 2009.[2] On 26 March 2009 lead Defence Counsel sent a letter to the Registry, Trial Chamber and Prosecution addressing the issue. On 9 April 2009, the Trial Chamber indicated that, if appropriate, it would decide upon the start date for the Defence case on 4 May 2009 after delivering its Rule 98 Decision. On 15 April 2009, the Principal Trial Attorney for the Prosecution responded to the letter of 26 March 2009. On 4 May 2009, following the oral Rule 98 Decision, upon the invitation of the Presiding Judge both parties made submissions in relation to the issue of fixing a date for the commencement of the Defence case.[3] The Presiding Judge specifically informed the parties, prior to hearing their submissions that the Trial Chamber had seen both the letters of 26 March and 15 April.[4] Having initially stated that 15 July would be a suitable date for the start of the Defence case, lead Defence Counsel then asserted that the Defence would require until at least the middle of August.[5] Having heard submissions from both parties and deliberated, the Trial Chamber pronounced the

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[1] *Prosecutor v. Taylor*, SCSL-03-01-T-786, "Public with Annexes A, B and C Defence Notice of Appeal and Submissions Regarding the 4 May 2009 Oral Decision Requiring the Defence to Commence its Case on 29 June 2009", 4 June 2009 ("**Appeal**").
[2] *Prosecutor v Taylor* Trial Transcript ("T") 9 February 2009, pp.24048 – 24049.
[3] T, 4 May 2009, p. 24211.
[4] T, 4 May 2009, p. 24212.
[5] T, 4 May 2009, pp.24213 – 24214.

majority decision that the Defence case would start on 29 June 2009. At the outset of the ruling the Presiding Judge specifically noted that the Trial Chamber had considered the letters of 26 March and 15 April and the arguments of both parties.[6]

III. STANDARD OF REVIEW ON APPEAL & APPLICABLE LAW

4. It is well established jurisprudence that Trial Chambers exercise discretion in relation to the conduct of proceedings before them.[7] In particular, Trial Chambers have discretion in relation to the scheduling of a trial.[8] As such an Appeals Chamber will accord deference to the discretionary decision of the Trial Chamber.[9] This deference is based on an Appellate Chamber's recognition of a Trial Chamber's familiarity with the day-to-day conduct of the parties and practical demands of the case.[10] The Trial Chamber's exercise of discretion will only be reversed by an Appeals Chamber if it is demonstrated that the Trial Chamber made a "discernable error" because its decision was made on an incorrect interpretation of governing law, was based on a patently incorrect conclusion of fact, or was so unfair or unreasonable as to constitute an abuse of the Trial Chamber's discretion.[11] In reviewing the exercise of a discretionary power, an appellate tribunal does not necessarily have to agree with the Trial Chamber's decision as long as that Chamber's discretion was properly exercised in accordance with the relevant law.[12] In simple terms, the question is whether the exercise of the discretion was "reasonably open" to the Trial Chamber,[13] or whether conversely, the Trial Chamber "abused its discretion".[14]

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[6] T, 4 May 2009, p. 24220.
[7] *The Prosecutor v Elie Ndayambaje et al*, "Decision on Joseph Kanyabashi's Appeal against the Decision of Trial Chamber II of 21 March 2007 concerning the Dismissal of Motions to Vary his Witness List", 21 August 2007, ("**Ndayambaje Appeal**") para. 10.
[8] *Prosecutor v. Taylor*, SCSL-03-01-PT-182, "Decision on Defence Application for Leave to Appeal "Joint Decision on Defence Motions on Adequate Facilities and Adequate Time For the Preparation of Mr. Taylor's Defence" dated 23 January 2007", 15 February 2007, para. 12; and *Augustin Ngirabatware v. The Prosecutor*, ICTR-99-54-A, "Decision on Augustin Ngirabatware's Appeal of Decision Denying Motions to Vary Trial Date", 12 May 2009, ("**Ngirabatware Appeal Decision**") para 8.; Ndayambaje Appeal para. 10.*The Prosecutor v Ildephonse Hatgekimana*, ICTR-00-55B-T, "Decision on Defence Motion to Reconsider Trial Date", 4 May 2009, para. 4
[9] Ndayambaje Appeal, para. 10.
[10] Ibid.
[11] Ibid., and Ngirabatware Appeal Decision, para 8. Emphasis added.
[12] *Prosecutor v Norman, Fofana and Kondewa*, SCSL-04-14-T-688, "Decision on Interlocutory Appeals against Trial Chamber Decision Refusing to Subpoena the President of Sierra Leone", 11 September 2006, para. 5.
[13] *Prosecutor v Delalic et al.*, IT-96-21-A, "Judgment", Appeals Chamber, 20 February 2001, para. 274.
[14] Ibid., para. 533.

5. It is also established jurisprudence that a Trial Chamber has an obligation to provide reasons for its decision. A Trial Chamber is not; however, required to articulate its reasoning in detail, and the fact that a Trial Chamber does not mention a particular fact in its order does not by itself establish that the Chamber has not taken that fact or circumstance into consideration. Indeed, in the *Milosevic* case, the Appeals Chamber of the ICTY relied not only upon the Trial Chamber's decision but also upon submissions made in the context of a status conference, in concluding that there was no discernable error of law in relation to the Trial Chamber's decision regarding the start date for the Defence phase of that case.[15]

IV. GROUNDS AND SUBMISSIONS IN RESPONSE TO THE APPEAL

6. In this Response, to avoid unnecessary repetition, the Prosecution will first set out its arguments which are common to all of the grounds of appeal raised by the Defence, and will then set out the necessary additional arguments pertaining to the individual grounds of appeal.

Submissions relevant to all Grounds of Appeal:

7. In setting the start date for the Defence case for the 29 June 2009, the majority exercised its discretion in a manner which was undoubtedly "reasonably open" for it to do so. It is the responsibility of the Trial Chamber and not the parties to set the trial schedule. Rule 26*bis* specifically entrusts both the Trial and Appeals Chambers with the dual mandate of ensuring a trial is both fair and expeditious.[16] These are not alternative responsibilities, but rather concurrent. Although the parties are certainly entitled to make submissions to the Trial Chamber, it would not be appropriate for the Trial Chamber simply to defer to the start date proposed by lead Defence Counsel; indeed to do so would entail the Trial Chamber impermissibly fettering its discretion, which

[15] *The Prosecutor v Slobodan Milosevic*, IT-02-54-AR73.6, "Decision on the Interlocutory Appeal by the Amici Curiae against the Trial Chamber Order Concerning the Presentation and Preparation of the Defence Case", 20 January 2004, para. 7, in so concluding the Appeals chamber relied upon the verbal commentary by the Presiding Judge which accompanied the ruling, as well as representations made by the parties including the *amicus curiae* at the status conference as "relevant to the question of whether the Trial Chamber gave the issues involved due consideration".

[16] Rule 26*bis* provides that: "The Trial Chamber and the Appeals Chamber shall ensure that a trial is fair and expeditious and that proceedings before the Special Court are conducted in accordance with the Agreement, the Statute and the Rules, with full respect for the rights of the accused and dues regard for the protection of victims and witnesses".

would certainly amount to an error of law or error in the application of law. It was plainly within the remit of majority's reasonable exercise of its discretion to set a start date for the Defence case two weeks prior to the date requested by lead Defence Counsel, and as such the majority decision cannot be regarded either as "unreasonable" or unfair so as to constitute an abuse of its discretion.

8. The Defence argument that the majority failed to consider and/ or failed to give due weight to the various matters raised in the grounds of appeal, giving rise to an error of law and/ or error of fact and/or error in the exercise of its discretion, does not withstand scrutiny. All of the matters raised by the Defence in its grounds of appeal were addressed either in the Defence letter of 26th March,[17] and/or the Prosecution letter of 15th April;[18] and/or the submissions of Lead Counsel for the Defence,[19] and/ or the submissions of Prosecution Counsel.[20] Given that (1) the Presiding Judge stated prior to the parties submissions that they had read the letters of the 26th March and the 15th April, (2) submissions were made by counsel for the Prosecution and the Defence immediately prior to the Trial Chamber's deliberations, and (3) that at the outset of the oral ruling, the Presiding Judge specifically stated that both the letters and the parties submissions had been considered in reaching the majority decision; these matters were plainly within the contemplation of the majority. It cannot be said that the majority failed to consider them in reaching its decision as to the start date of the Defence case.

9. As regards the argument that the majority failed to accord sufficient weight to these

[17] Defence Letter of 26 March, at p.2 referred to the Article 17 rights of the Accused and the statutory guarantee of adequate time for the preparation of the Defence case (Ground 1); and also at p.2 to the logistical circumstances pertaining to the Defence case, including the death of the International Investigator (Ground 2), and at p.3 to the time limits ordered in the other cases at the Special Court (Ground 3), and at p.1 to the need for an expeditious trial – specifically that it would be better for the Defence to be "fully prepared upfront, rather than to request multiple adjournments throughout the Defence case…" (Ground 4).

[18] Prosecution Letter of 15 April 2009, at p.1 referred to the rights of the Accused (Ground 1).

[19] T, 4 May 2009, at p.24212 – 24213, lead Defence Counsel specifically addressed the Trial Chamber about the logistical issues relating to the preparation of the Defence case (Ground 2), and at p.24213, lead Defence Counsel specifically submitted to the Trial Chamber that "time allowed at this stage will guarantee savings down the line" (Ground 4), and at p.24219 lead Defence Counsel specifically made submissions to the effect that the Prosecution would not suffer prejudice as a result of the defence request (Ground 5).

[20] T, 4 May 2009, p.24216, where Prosecution Counsel referred to Rule 26*bis* (Ground 1); and p.24217, where Prosecution Counsel referred to the Trial Chamber's obligation to ensure that the Defence have sufficient time to adequately and fairly prepare the Defence case and to prepare Mr. Taylor for his testimony (Grounds 1 and 4); and at p. 24218, referring to the rights of both parties to a fair and expeditious trial (Ground 1); and p. 24217, referring to the logistical issues pertaining to the preparation of the Defence case (Ground 2).

matters, this is in essence an attempt to re-litigate the merits of the majority's decision in the hope that the Appeals Chamber will reach a different view on the merits. This is not the test on appeal. In addition, the argument is fatally flawed as the Trial Chamber considered the arguments raised by the parties; the majority simply took a different view than that advocated by lead Defence Counsel.

Additional Submissions pertaining to the First Ground of Appeal:

10. Starting the Defence phase of the case two weeks prior to the date requested by the Defence does not deprive the Accused of any right under Article 17. The Accused's right to a fair trial does not translate into giving the Accused as much time as he requests and the Defence has not established in any way that the majority decision deprives the Accused of any right under Article 17.

11. The Accused has been afforded adequate time for the preparation of his case consistent with his rights under Article 17 and the duty of the Trial and Appellate Chamber's of the Special Court pursuant to Rule 26*bis*. The Defence arguments ignore the significant time that the Defence has had before, during and after the Prosecution case in chief. This Defence team has had almost two years to prepare. Further, it must not be forgotten that the current team did not begin from ground zero but rather had the benefit of the efforts of the prior Defence team - a team which included some members of the current team.[21] In the majority ruling, the Presiding Judge, noted that: "Mr Taylor has been in custody since March 2006 and presumably investigations and preparations have been ongoing since that time... the last prosecution witness was heard on 29 January 2009...The Defence intends to call Mr. Taylor to give evidence and no doubt that will be a substantial amount of time which could be used for the further preparation of Defence witnesses".[22] The Accused has thus had the benefit of Defence efforts in excess of three years to prepare his case. The time available to the Defence includes an adjournment of proceedings following the start of the trial in June 2007 after the Accused relieved his prior lead Defence Counsel and announced his intention to boycott the proceedings. The Trial Chamber granted the partly restructured Defence

[21] T 4 May 2009 p. 24218 and T 20 August 2007, p.9.
[22] T 4 May 2009 p. 24220.

team a delay of over five months, with the understanding – based on Defence assertions – that such delay would help to streamline the trial and avoid unnecessary delays during the trial.[23] An additional five months will have passed between the date the last witness testified in the Prosecution case and the scheduled date for the start of the Defence case.

12. The argument that refusal to allow the Defence extra time will result in inadequate time to prepare the Accused for his testimony is equally without merit. The Accused has been in the custody of the Special Court since March 2006; he has no doubt had a significant amount of time to contemplate his responses to the charges brought against him. Further during that time for contemplation he has had the benefit of advice from two Defence teams; the latter whom have had since August 2007 to "prepare" the Accused for his testimony.

13. The Defence assertion that additional time is warranted because the bulk of their exhibits will be introduced through the testimony of the Accused is equally without merit. Defence Counsel has previously made plain that the Defence received the majority of the Defence exhibits from Charles Taylor's personal archives in the summer of 2007,[24] the bulk of the Prosecution disclosure having been received before that. The Defence has, therefore, had at least two years to assess and analyse these documents with the assistance of the Accused in preparation for his testimony.

14. Finally, lead Counsel "preparing" the Accused to give evidence does not prevent either lead Defence Counsel or the Accused from "assisting" or giving or receiving instructions from the remainder of the Defence team.[25] Moreover, the remainder of the Defence team includes a number of senior and/ or experienced counsel who are no doubt capable of organising the Defence case in conjunction with the Accused and lead Defence Counsel during this "preparation" period.[26]

15. In relation to the resources at the disposal of the Defence team, it cannot be said that the

[23] T, 20 August 2007, pp. 20, 30 and 34.
[24] T, 7 May 2009, p. 24237 and see also Special Court for Sierra Leone, Press and Public Affairs Office, Press Clippings, Monday 20 August 2007, pp.40 – 41.
[25] See the Defence argument in the Appeal, para. 23.
[26] See the Special Court for Sierra Leone, List of Judges and Staff, Participants in Charles Taylor Trial (Requiring Access to ICC Courtroom 2), dated 5 June 2009, which lists 18 members of the Defence team with access to ICC Courtroom 2, and see also argument by Prosecution counsel concerning the significant resources allocated to the Defence team at T, 4 May 2009, p.24217.

Accused has received inadequate resources for the preparation of his defence in contravention of his Article 17 rights. The Accused has significantly more resources at his disposal than any other Accused appearing before the Special Court – with the benefit of numerous experienced lawyers, in addition to legal assistants, national and international investigators, a witness management officer, case manager and a team of legal interns, as well as other resources.[27] The Defence has not shown why it will be necessary that the many members of its team will be "completely employed" with the testimony of the Accused.[28] That the Defence has decided to allocate its abundant resources in this fashion does not render the majority decision an abuse of discretion; rather, it is for the Defence to manage its resources in a reasonable manner.

Additional Submissions Pertaining to the Second Ground of Appeal:

16. In relation to the Defence argument concerning the unfortunate death of its international investigator, it should be recalled that for great majority of the three year period that the Defence has had to investigate the case, it has had the benefit of both international as well as national investigators. Further, during the period where the Defence had to find a replacement investigator, the Defence team continued to have the assistance of other investigators, as well as the resources already referred to in paragraph 13 above, at its disposal. Further, in an international tribunal, it is not unusual to have regular turnover of personnel and all parties must deal with this problematic reality.

Additional Submissions Pertaining to the Third Ground of Appeal:

17. The Defence argument that this Accused has been allocated less time to prepare his case than other Accused persons in cases before the Special Court provides no basis for granting the appeal. First, each case is decided on its own merits. Also, the CDF and RUF cases are distinct in that Trial Chamber I was simultaneously engaged in two trials, so during the Rule 98 adjournment in one trial the Trial Chamber also had to discharge its continuing duties in the other case. Moreover, as referred to above, none of the other Defence teams in the Special Court have benefited from the significant

[27] For example, the Association for the Legal Defence of Charles Taylor, see http://for-taylor.net/index.html.
[28] See the Defence argument in the Appeal, para. 24.

resources that have been allocated to the Taylor Defence team.

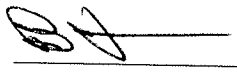
V. CONCLUSION

18. The majority decision to set the date for the start of the Defence case for 29 June 2009 was a legitimate exercise of the Trial Chamber's discretion and violated no rights of the Accused. The Defence Appeal should be denied.

Filed in The Hague,

8 June 2009

For the Prosecution,



Brenda J. Hollis

Principal Trial Attorney

LIST OF AUTHORITIES

SCSL

Prosecutor v Taylor

Prosecutor v. Taylor, SCSL-03-01-PT-182, "Decision on Defence Application for Leave to Appeal "Joint Decision on Defence Motions on Adequate Facilities and Adequate Time For the Preparation of Mr. Taylor's Defence" dated 23 January 2007", 15 February 2007.

Prosecutor v. Taylor, Trial Transcript 20 August 2007.
Prosecutor v. Taylor, Trial Transcript 9 February 2009.
Prosecutor v. Taylor, Trial Transcript 4 May 2009.
Prosecutor v. Taylor, Trial Transcript 7 May 2009.

Prosecutor v Norman, Fofana and Kondewa

Prosecutor v Norman, Fofana and Kondewa, SCSL-04-14-T-688, "Decision on Interlocutory Appeals against Trial Chamber Decision Refusing to Subpoena the President of Sierra Leone", 11 September 2006.

ICTY

Prosecutor v Delalic et al., IT-96-21-A, "Judgment", Appeals Chamber, 20 February 2001.

http://www.icty.org/x/cases/mucic/acjug/en/cel-aj010220.pdf

The Prosecutor v Slobodan Milosevic, IT-02-54-AR73.6, "Decision on the Interlocutory Appeal by the Amici Curiae against the Trial Chamber Order Concerning the Presentation and Preparation of the Defence Case", 20 January 2004.

http://www.icty.org/x/cases/slobodan_milosevic/acdec/en/040120.htm

ICTR

Augustin Ngirabatware v. The Prosecutor, ICTR-99-54-A, "Decision on Augustin Ngirabatware's Appeal of Decision Denying Motions to Vary Trial Date", 12 May 2009.

http://www.ictr.org/ENGLISH/cases/Ngirabatware/decisions/090512.pdf

The Prosecutor v Ildephonse Hatgekimana, ICTR-00-55B-T, "Decision on Defence Motion to Reconsider Trial Date", 4 May 2009.

http://www.ictr.org/ENGLISH/cases/Hategekimana/decisions/090504.pdf

The Prosecutor v Elie Ndayambaje et al, "Decision on Joseph Kanyabashi's Appeal against the Decision of Trial Chamber II of 21 March 2007 concerning the Dismissal of Motions to Vary his Witness List", 21 August 2007.

http://www.ictr.org/ENGLISH/cases/Kanyabashi/decisions/070821.pdf

OTHER DOCUMENTS

Press Clippings
Special Court for Sierra Leone, Press and Public Affairs Office, Excerpt of Press Clippings, Monday 20 August 2007.

Copy attached.

Letters
Letter from lead Defence Counsel, 26 March 2009.
Letter from the Principal Trial Attorney for the Prosecution, 15 April 2009.

Copies attached.

Other
Special Court for Sierra Leone, List of Judges and Staff, Participants in Charles Taylor Trial (Requiring Access to ICC Courtroom 2), dated 5 June 2009.

Copy attached.

25409

Special Court for Sierra Leone, Press and Public Affairs Office, Excerpt of Press Clippings, Monday 20 August 2007.

25410

SPECIAL COURT FOR SIERRA LEONE
PRESS AND PUBLIC AFFAIRS OFFICE

The new Taylor Defence team held a press conference at the British Council on Saturday. See today's *'Special Court Supplement'* for the full transcript and press release.

PRESS CLIPPINGS

Enclosed are clippings of local and international press on the Special Court and related issues obtained by the Press and Public Affairs Office
as at:
Monday, 20 August 2007

Press clips are produced Monday through Friday.
Any omission, comment or suggestion, please contact
Martin Royston-Wright
Ext 7217

25411

Special Court Supplement
Taylor Defence Team Press Conference
18 August 2007, at British Council

[Introduction of members of the Taylor defence team, partly off-microphone.]

COURTENAY GRIFFITHS: Thank you very much, and thank you Counselor Supuwood. On Monday next we make our first appearance in The Hague as the new defence team for the former President of Liberia, Charles Taylor, in a trial intimately linked with events which took place, indeed engulfed, this part of West Africa.

Now that trial, as we all know, is taking place thousands of miles away, yet the issues raised are directly relevant to the lives of people not only here in Sierra Leone, but also in Liberia, Guinea, and other countries in this region. And [indistinct] the purpose of setting up the Special Court for Sierra Leone because we are assured by those responsible for the founding of that tribunal and indeed for its creation in the first place, that the purpose behind it is to entrench the idea of the rule of law and due process into West African society, as if these were alien notions of which West Africans were unaware and consequently needed to be told.

We therefore thought it imperative that before we set foot in [their] court on Monday, that we set foot here first [indistinct] in West Africa so that we could assess the situation here on the ground, and also consider what impact, if any, the Special Court has had on the lives of those most intimately involved with the struggles which gave rise to its inception.

So consequently we arrived in Liberia last Sunday, and we were supposed to have got here much earlier but unfortunately our flight from Monrovia to Freetown was cancelled so we only got here last night.

Now, during the time that we were in Liberia, we became aware that there are concerns on the ground here in West Africa as to whether or not former President Charles Taylor can indeed obtain a fair trial in the Special Court for Sierra Leone. That concern arises because of various pronouncements made by prosecutors from the Office of the Prosecutor ever since the inception of the Special Court. When one reads some of the comments made in the past by not only the current Chief Prosecutor Mr. Rapp, but also his predecessor Sir Desmond-as-he-now-is de Silva, and before him, David Crane, to the effect that, for example, ex-President Taylor "must be convicted", to quote Mr. Crane, that he's "Africa's Hitler", to quote Mr. de Silva, that "the region cannot afford for him to be acquitted", again to quote Mr. Crane, and more recently in July Mr. Rapp, the current prosecutor, made similar comments in a lecture he delivered in Dublin, in the Republic of Ireland.

Now that concerns us, because we can trace the making of such comments back to at least November of last year. And remember, the tribunal to try former President Charles Taylor, has not heard a single word of evidence yet – not a single word of evidence. And yet we have the Prosecutor speaking as if the outcome of those proceedings is already a foregone conclusion.

We are here to disabuse him of that idea.

And we are here to encourage you, that you have a role in determining whether or not former President Charles Taylor does indeed receive a fair trial in The Hague. And I say that you have a role to play in it because effectively, as you all know, he's being tried thousands of miles away, not in front of a jury of

his peers – that is the people of West Africa, his own people in Liberia and also the people he was alleged to have terrorized here in Sierra Leone.

One would have thought that you are best qualified, given your experiences, to be his jury in a trial of this kind – but not so. He has been transported thousands of miles away to be tried in The Hague. And we [indistinct] that you monitor that trial closely here in West Africa because of its direct relevance to your lives here. Because it seems to me that here we have a court which ostensibly was set up for your benefit, and [indistinct] ask, what benefit has Sierra Leone received from this trial? Millions of dollars have been spent over the years. What impact has that expenditure had on the lives of ordinary Sierra Leoneans? You're not even able to follow the proceedings on your TV screens or on the computer! One would have thought, given the centrality of this trial, that for example steps might have been taken to put up, you know, public broadcasting facilities so that people in the area would be informed and be in a position to follow the proceedings, which – proceedings which are so intimately bound up with their lives.

But it goes beyond that, because it seems to us that one also has to ask – and I ask it rhetorically – even if, having expended these millions of dollars, former President Charles Taylor is convicted in The Hague, how does that benefit the ordinary Liberians and the ordinary Sierra Leoneans who are most affected, allegedly, by the supposed crimes. How do you benefit from that? Which is why when you look at our press release, you see that one of our primary concerns is the possible divisions that proceedings of this kind could introduce between people historically happy neighbours. And the question is, is it worth the price? Is it worth the price at the end of the day? And equally at the end of the day, who stands to benefit from this? And we assert quite boldly that it's not you.

And so, what I'd like to consider and hopefully through our interaction this afternoon we can begin to start addressing this question, how relevant are these proceedings to the real lives of people [who] live here in Sierra Leone? How relevant are they?

That's all I'd like to say at the moment, unless any of my colleagues would like to add something.

So can we invite questions then?

Q: [Mohamed Suma]: My name is Mohamed Suma, the Programme Director of the Sierra Leone Court Monitoring Programme. [Indistinct] … One of the underlying causes of the conflict was lack of access to justice. … I know this is largely the work of the Registry to ensure that the trial process is accessible to us here in West Africa. So on your side, what are you doing to ensure that happens to be the case…?

GRIFFITHS: Can I say two practical things which we've done. Firstly, whilst in Liberia, we met with various Liberians and we've agreed that at least one member of the team will return to Liberia at regular intervals to provide briefings and to keep engaging outreach work with grassroots communities and groups around Liberia. And this very morning I spoke to the Deputy Registrar, and one of the topics we discussed, albeit briefly, was the question of the defence becoming more involved in that kind of outreach work. So it's very much a part of the agenda as we see it. But I'm glad that we're not the only ones who appreciate the inadequacy of the current provisions for getting the message out to the masses here in Sierra Leone.

Q: [Clarence Roy-Macaulay, AP, off microphone]

GRIFFITHS: We eventually signed a contract on the first of August. So effectively we've only been in place now for a matter of three weeks.

Q: [Off microphone]

GRIFFITHS: [Indistinct] because Counselor Supuwood, as you know, is a very prominent Liberian lawyer. I was originally born in Jamaica as my biography makes clear, but I've grown up in the United Kingdom. I emigrated to the United Kingdom with my family when I was an infant. [Indistinct] standing to my right is a Nigerian by birth, but he's an American-educated and qualified attorney. And then we have Roger Sahota, British born?

SAHOTA: That's correct.

GRIFFITHS: But parents from the Indian subcontinent, and again, qualified English lawyer. And then a very important member of our team of course, a fellow countryman of yours, our very own Prince Taylor, and then we have Logan Hammerick who's an American. So it's very much a mixed bag.

Q: [Lansana Fofana, BBC]: My name is Lansana Fofana. I work for the BBC World Service. From what I've heard here, it seems to me that at this point in time your defence of Mr. Taylor is [indistinct] towards appealing to the emotions. For instance, I heard you say that [indistinct] is that this whole affair might break or make the West African subregion because there are growing concerns in the region as well as Liberia more particularly about this whole trial and how transparent and how fair they might be. My question now is, isn't this an appeal to sentiment rather than actually going for the legal battle [indistinct] solely responsible for the carnage which happened in this region.

GRIFFITHS: Well, thank you for your frankness. The idea that one man could be solely responsible for the carnage which took place in this part of the world I find frankly astonishing. And you note that one of the comments we make in the press release is the need for the people of Sierra Leone to examine themselves critically and consider to what extent they too had a hand in their own misfortune. It's very easy to blame the outsider, because by so doing one can absolve oneself of that degree of self-examination which often leads to the truth and a proper understanding of reality.

But I think you misunderstand us if you think that we are here appealing to emotion. We have a very clear grasp of reality, and it's precisely because we have grasped that reality and appreciate that there are powerful forces who feel that only one verdict is possible in this case, it's precisely because we recognize that reality, why we see the need to educate people here on the ground as to that reality and what they can do about it if this court is to live up to its promise and its claim to be bringing due process and fair trial proceedings to West Africa. If that really is the true purpose, then we shouldn't have a prosecutor behaving in the way that they've done, suggesting that it's a foregone conclusion that a conviction is the only outcome in this case. No, we're not appealing to emotion at all. We are merely facing reality.

And the other problem as I see it in the way in which you pose your question is this: We have to operate within certain constraints as lawyers, and we need to be somewhat circumspect as to the comments we make about the evidence to be called in due course. And as a result, I am not in a position because of those constraints to express to you what my view is as to the strength or otherwise of the evidence the prosecution the prosecution propose to give. Safe to say that I am confident that much of it will be exposed for what it is – a rather shoddy concoction of rumour, hearsay and rubbish.

Q: [Clarence Roy-Macaulay, off microphone]

GRIFFITHS: I'll answer your question in this way: Bearing in mind that former President Charles Taylor, charged on that indictment containing currently 11 counts, is not charged with any offence committed against his own people in Liberia, all of those offences relate specifically and solely to things which occurred here in Sierra Leone, so that stripped to its basic components, stripped to its basic components, what we have here is the sovereign leader of a sovereign country charged with interference

with the affairs of a neighbouring country, where that sovereign leader may or may not have felt that events in that neighbouring country could potentially and did in fact affect the integrity of his own country. Now, such a leader would not be unique historically in intervening in the affairs of another country. We only have to look at what is happening in the world today. If what Mr. Taylor did was criminal, why is the activities of the United States of America in Iraq not considered criminal? Why are the activities of the United Kingdom and the United States in Afghanistan not considered criminal? Why wasn't the South African government, when it invaded Angola to prevent them obtaining their freedom; why wasn't the white leader of apartheid South Africa not considered a war criminal? Because the bottom line is, international criminal justice is governed by power relations, global power relations. And so at the very heart of it is a very deep-seated hypocrisy. Certain people will always be above the law, and that certainly isn't Africans. The joke in The Hague is, it's not the International Criminal Court, it's the African Criminal Court. You know why? The only person indicted in front of that court is guess who? An African. And every pending investigation in that court concerns who? Africans. Why?

Q: [Mohamed Suma, off microphone]

GRIFFITHS: Can I say first of all that I've [seen] Mr. Taylor on three occasions. The first was [indistinct] an introduction meeting, but I've seen him and discussed matters with him at least superficially now on two occasions. And what I [can] say and say quite clearly is that he is anxious to get this trial [on the go] as soon as possible. Do not think that because we are asking for time in order properly to prepare his defence that this is somehow some back-avenue defence delay tactics which will benefit the ex-president [indistinct]; it's nothing to do with that. But the bottom line is, there's something like 40-odd thousand pages of documentation. That's only the documentation so far the prosecution [as heard]. As a consequence to that visit to Liberia, we have discovered a mountain of primary material which is still [boxes] in Liberia which has to be transported up to The Hague so that we can properly peruse it, catalogue it, and determine how relevant that material might be to our defence. Now remember, the vast majority of us have only been in post for three weeks. You can't get on top of that material in that period of time. You need a reasonable period of time in which to do that. And my professional review is, having been involved in criminal defence work for some 27 years now, so I've got a little experience, my view is that we need at least three to four months to properly prepare a case of this size. And we don't see that we could properly embark on the defence of former President Taylor until we feel that we're on top of all of the material. I don't personally think that we can do that properly before January next year, and even that is pushing it.

Q: [Mohamed Suma, off microphone]

GRIFFITHS: I think I'll let Counselor Supuwood answer that, because he's based in Liberia and he could have a better understanding of the situation on the ground.

SUPUWOOD: [Largely indistinct and partially off-microphone]

Q: [Clarence Roy-Macaulay, off microphone]

GRIFFITHS: The 20th of August was originally set down as the date for the trial to start, but as a consequence of our appointment and our having filed a motion for the trial to be adjourned, the 20th of August date was transformed into a status hearing as opposed to the commencement of the trial.

Q: [Mohamed Suma] When was this motion filed?

GRIFFITHS: I believe we filed it on August the 1st, but...

UNIDENTIFIED: I believe it was filed on July the 31st or August the 1st, and the Chamber has set three items on the agenda for Monday. The first is considering our substantive request for an adjournment; the second item pertains to outstanding motions filed by the prosecution and how much time the new defence team but have to respond to those motions. And the third issue is like a miscellaneous housekeeping-type issue.

Q: [Clarence Roy-Macaulay, off microphone]

GRIFFITHS: It's unlikely that a great deal is going to be done. Frankly, it's more like a housekeeping exercise so that we can set an agenda for the trial [indistinct] once it starts.

MORRIS ANYAH: But I would add that Monday's quite a significant date in many respects, because depending on how much time the Chamber gives us, it will directly have implications for Mr. Taylor's right to a fair trial. Counsel has told you that we have in our offices in The Hague close to 40,000 pages of documents. Those are simply documents that the prosecution has disclosed to us. Separate and distinct from that are documents that we are gathering for our own case in chief. Because in our view this is not one of those cases where we will pursue a defence that's exclusively based on what you would call a "failure of proof argument", or that the prosecution has failed to meet his burden of proof. This is a case where, when the defence's side of the case commences, we will take to the offensive, and we will present evidence that will actually, in our view, would vindicate Mr. Taylor. So we also have anticipate how many documents the defence will have to put together, disclose to the prosecution, and when you add all of that, and considering the fact that new counsels were formally appointed on July the 17th, but only signed their contract with the court on August the 1st, and they have essentially been on duty for 18 days now. So it's not unreasonable to ask for three to four months to adequately review all those materials. Indeed, in most domestic bar jurisdictions – counsel is a member of the British Bar, Mr. Sahota as well; me, I'm a member of several Bars in the U.S. – to proceed in a case of this magnitude with the amount of information you have, and to proceed in short order [in] your appointment, you would be subject to an ethical malpractice claim, and you could be disbarred from doing it, frankly. So we have to consider those issues as well.

But Monday is important because of how much time they would give us, because that would directly affect Mr. Taylor's right to a fair trial.

GRIFFITHS: And what we need to appreciate [as well in that] context is that the Court is under a great deal of pressure to get this trial back on the road as soon as possible. Because we all appreciate that the Court is funded by voluntary subscriptions from abroad. And that money isn't infinite. And consequently, the Court [indistinct] to wrap up its proceedings by the end of 2009. One can understand the pressure, economic and otherwise, on the tribunal to conclude its proceedings as quickly as possible.

Letter from lead Defence Counsel, 26 March 2009.

25418

SPECIAL COURT FOR SIERRA LEONE
OFFICE FOR THE DEFENCE OF CHARLES TAYLOR
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MEMORANDUM

To: Herman von Hebel, Binta Mansaray, Gregory Townsend, Claire Carlton-Hanciles, Will Romans, Simon Meisenberg, Stephen Rapp, Brenda Hollis, Saleem Vahidy, Elaine Bola-Clarkson

From: Courtenay Griffiths, QC

Cc: Terry Munyard, Andrew Cayley, Morris Anyah, Silas Chekera

Date: 26 March 2009

Subject: Defence Case Start Date

Dear All -

I am rounding up a 2 week trip to West Africa during which I met with a number of important witnesses and various team members and SCSL personnel (including WVS). Thus I am now in a better position to indicate how much time our team is likely to need to ensure that we have adequate time for the preparation of the defence case. I am writing to all parties informally, because I know that the time we need for preparation has important administrative and budgetary implications for the court. We are particularly conscious that given the current state of the global economy, many of the countries which have historically supported the SCSL may now adjust their priorities.

Nonetheless, for reasons which I develop below, my considered view is that the earliest we will be able to start our defence case is 15 July. To start any earlier would be a false economy. It is fairer to all parties concerned, and a more efficient use of time and resources, to be fully prepared upfront, rather than to request multiple adjournments throughout the defence case, which would be the inevitable result of a forced premature start. Silas had indicated to the Management Committee in November of last year that our team would need approximately six months from the end of the Prosecution case to the beginning of the defence case. This estimate is proving to be accurate.

My team in The Hague as well as the teams in Freetown and Monrovia are fully committed and working diligently. Since the last Prosecution witness testified, myself and co-counsel have been involved in a comprehensive review of the evidence, not only for Rule 98 purposes, but with a view to establishing how to streamline the defence

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case. That review has an impact on the course of the ongoing investigations – some witnesses are no longer necessary while other have to be found.

Of course, linkage witnesses like ours are more time-intensive than crime-based witnesses, because they are often high-profile and enlisting their assistance takes extra effort. Often they demand discussion with Lead Counsel directly, and this has been difficult to accommodate while the Prosecution case was in full swing and counsel were in court every day. Additionally, our linkage witnesses are not conveniently located in a crime base area, and thus require travel throughout Africa. The recent death of our International Investigator Ambassador Iroha has further complicated the investigations aspect of our case preparation.

I envisage that my team will spend the time between now and 15 July as follows:

- Now to 6 April – Finalize Rule 98 preparation and arguments
- Mid-April to end of May – Terry Munyard, Morris Anyah and one Legal Assistant will be based in Freetown and Monrovia; I will travel between the two and elsewhere as necessary. We will undertake extensive witness interviews, make final selections, compile the required documentations, and prepare all witnesses for trial (witnesses not to exceed 50).
- End of May to mid-July – I meet with Mr. Taylor to prepare him for testimony. This requires an extensive analysis of exhibits and personal knowledge. This will take 4 to 6 weeks, as I anticipate his testimony will take the same. You will appreciate that it was not possible to prepare Mr. Taylor to give testimony during the Prosecution case because he was in Court every day.
- June and July will be used to compile results of the field work and put all logistics in place for the travel of the witnesses.
- Andrew and Silas will stay in The Hague to oversee filings, prepare the pre-defence case materials, and coordinate disclosure obligations, etc.

We are aware of the resource-implications of the matters set out above, but would observe that it would be wise and fair to consider them in light of:

- The Article 17 rights of the accused and the statutory guarantee of adequate time for the preparation of the defence case.

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- The disparity of resources between the defence and the prosecution, even **now** that the prosecution has closed its case.
- The fact that the change representation which occurred in June 2007 has meant that the accused's current team of lawyers have had out of necessity to prepare to deal with the prosecution case whilst in tandem preparing the defence case, in a situation where all potential witnesses are a continent away. In this regard the prosecution had the luxury of five years in which to prepare their case whilst we have had in effect 18 months.
- Further the time requested is less than that granted in all other cases heard before this court.
- Finally, it should be borne in mind that the prosecution were allowed to present their case without any pressure being placed on them as to the duration and content of their case, even though, in the event, their case lasted twice as long as indicated, thus creating the pressures currently acting upon the proceedings.

I am sure this time-line will be discussed at length at the appropriate time; however, I thought it helpful to make all parties aware of the work we have already undergone and the work that lies ahead.

Yours,

Courtenay Griffiths Q.C.
Lead counsel

Letter from the Principal Trial Attorney for the Prosecution, 15 April 2009.

SPECIAL COURT FOR SIERRA LEONE

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By email

April 15, 2009

Mr. Courtenay Griffiths, QC, Herman von Hebel, Binta Mansaray, Gregory Townsend, Claire Carlton-Hanciles, Will Romans, Simon Meisenberg, Stephen Rapp, Saleem Vahidy, Elaine Bola-Clarkson.

Re: *Prosecutor v. Taylor* - SCSL-03-01-T
Defence Case Start Date

Dear All,

I refer to the Defence letter of 26 March 2009 regarding the above matter.

The Prosecution wishes to thank the Defence for indicating when it wishes to start the Defence case. It may be of assistance to give advance notice of the Prosecution position as well. In that regard, I would like to first point out that the requested date is a Wednesday, and that the following Friday is the last official work day before the ICC recess, which begins at 5:00 pm on that date and continues until 10 August. So, unless the trial continues through the ICC recess, we would have only three days of witness testimony before the recess. The Prosecution understands that it has been informally agreed between the Registry and the ICC that the courtroom and sufficient support staff could be available to continue the trial through the ICC recess. The Prosecution requests that formal commitments be obtained with the ICC to ensure the availability of the courtroom throughout the summer regardless of the date the Trial Chamber orders the Defence case to begin.

The Prosecution notes that the Accused's right to a fair trial does not translate into giving the Accused as much time as Defence Counsel requests. Rather, that right translates into giving him the time that is required if the Defence exercises due diligence. This duty requires there be no undue delay, that is, no more delay than is reasonable or necessary.[1] One can assume this standard was applied to all requests for delay in the cases before the Special Court; therefore, what happened in the other trials before the SCSL, with multiple accused, may not be dispositive here. If any comparison would be helpful, it should be noted that this requested trial date would give this Accused—who is represented by four experienced counsel backed by a team

[1] *Prosecutor v. Taylor*, SCSL-03-01-T-182, Decision on Defence Application for Leave to Appeal "Joint Decision on Defence Motions on Adequate Facilities and Adequate Time for Preparation of Mr. Taylor's Defence" dated 23 January 2007, 15 February 2007, para. 13.

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of investigators and legal officers—almost as much delay as was given Slobodan Milosevic, who was ill and defended himself against some 60 counts related to three separate conflicts, with over 350,000 pages of disclosure and some 350 witnesses testifying against him in the case in chief, and whose case was heard before the ICTY Rule 98*bis* was amended to require oral submissions to expedite the proceedings. Regarding delay involved in cases using the oral Rule 98*bis* procedure, in the *Krajisnik* case (8 counts), which involved a very high level accused, the Accused was given a delay of some three months from the end of the Prosecution case until the commencement of the Defence case. In the *Milutinovic* case (5 counts), involving the former President of Serbia and five other accused, there was less than a two month delay from the close of the Prosecution case until the commencement of the Defence cases.

The Prosecution would make several additional points regarding the Defence letter. First, contrary to the Defence assertion at page 3 of the letter, the Prosecution case did not last twice as long as indicated. The Prosecution's estimate was that its case would last eight months, excluding recesses. Indeed, as the evidence was adduced the Prosecution carefully reviewed its case and determined it could reduce the number of witnesses required, which it did. The Prosecution efficiently presented its case, using some 461 total hours for direct and re-direct examination of its viva voce witnesses, approximately 43 hours or 13% less than the 504 hours estimated for the direct examination alone. This total is compared to approximately 448 hours for cross examination of viva voce witnesses. In total, the Prosecution case was presented in 205 court days, equaling 41 weeks or 9 ½ months, excluding breaks. This was to be expected given that our eight-month estimate for the case-in-chief was always based on the expectation that most of the Prosecution's crime base witnesses' evidence would be tendered through Rule 92*bis*. The additional time required for the presentation of the Prosecution case was largely attributable to the Defence successfully demanding the right to cross examine all but two of the Prosecution Rule 92*bis* witnesses.

Second, to state that the Prosecution had five years to prepare its case is misleading. During the three years time when the Accused was a fugitive, the Prosecution used its limited resources to carry out its mandate to investigate all potential cases, prepare and provide extensive pre-trial disclosure in all cases in which the Accused were in custody, and to prosecute those cases. Thus, only minimal and sporadic additional investigation was conducted related to the Taylor case. Further, this Defence team did not start from ground zero as implied. It had the benefit of the work done by the previous members of the team, including one co-counsel and two other lawyers who worked with the previous team. It must also be noted that the Accused was aware of the indictment against him and was represented by counsel before this court very early

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on. Thus he has had several years to consider the case against him and how to meet it, given his intimate knowledge of his conduct and that of his subordinates and associates.

Third, it is also misleading to speak of the disparity between Prosecution and Defence resources, without any accurate reflection of the resources available to the Defence. And, without considering, as stated above, the Prosecution's mandate to investigate and prosecute all potential cases. It must also be remembered that the Prosecution bears the burden of proof beyond a reasonable doubt, not the Defence. Regarding Defence resources, it is the understanding of the Prosecution that the Defence has had the services of a member of the Defence office for the greater part of this trial and that a member of the Defence office with knowledge of this case has now been provided to the Defence team as a full time member of that team, to use in any way it deems necessary. The Defence has also had the use of a significant number of interns, some who have been admitted to practice. Finally, it must be remembered that any delay has the effect of exhausting Special Court resources because of the need to maintain full-time judicial, registry and prosecution staff in place while these personnel await the start of the Defence case. This consideration makes it essential that no part of the delay be caused by members of the Defence working on cases other than that of the Accused.

Fourth, it must also be noted that ICC courtroom facilities may not be fully committed to this case after 24 September 2009, when another case is set to begin there. The ICC Press Release indicates that no postponement will be allowed except for compelling reasons (*http://www.icc-cpi.int/NR/exeres/44337E63-2415-4A1F-BB4A-3622EFD903E9.htm*). This could mean that we will not have a courtroom available at the ICC on a regular basis after 24 September, requiring part of the Defence case to be presented during intermittent sessions or in other facilities, and over a more extended period. This of course cannot be the reason for setting a date to start the Defence case which would violate the Accused's right to a fair trial but does mitigate against any delay for one day more than that for which good cause has been shown.

Finally, the Prosecution also notes that:

- Detailed cross examination indicates the Defence has identified the potential themes of any case it might present;
- The objections to Rule 92*bis* evidence indicate the Defence has closely reviewed and understood that evidence;
- Lead Defence Counsel's statements to the media that, as of about 26 January 2009, he had a list of potential witnesses and the Defence team was in the position of **finalizing** its Rule 98 submissions;

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- As was evidenced by the active role that the Accused played in court during the Prosecution case, it appears that the Accused has closely followed the presentation of the case against him and should be ready to tell his side of the story. Additionally, one or more of the Defence counsel have had ready access to him since August 2007. It is thus difficult to understand how it can be reasonable to assert it will take 6 weeks to "prepare" him to testify.

For the reasons given above, the requested trial date and ensuing delay in the start of the Defence case have not been shown to be reasonable or necessary.

Yours sincerely,

for Brenda J. Hollis
Principal Trial Attorney

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Special Court for Sierra Leone, List of Judges and Staff, Participants in Charles Taylor Trial (Requiring Access to ICC Courtroom 2), dated 5 June 2009.

SPECIAL COURT FOR SIERRA LEONE
LIST OF JUDGES AND STAFF, PARTICIPANTS IN CHARLES TAYLOR TRIAL
(REQUIRING ACCESS TO ICC COURTROOM 2)

25427
05 June 2009

NAMES/SECTIONS	TITLE
CHAMBERS	
Justice **LUSSICK**, Richard	Judge, Presiding
Justice **DOHERTY**, Teresa	Judge
Justice **SEBUTINDE**, Julia	Judge
Justice **SOW**, Malick Al Hadji	Judge, Alternate
APPAZOV, Artur	Legal Intern
BUFF, Carolyn	Associate Legal Officer
GIBSON, Katharine	Legal Intern
KIGGUNDU, Doreen	Associate Legal Officer
LAGARA, Zainab	Senior Secretary
MEISENBERG, Simon	Legal Officer
ROMANS, William	Senior Legal Officer
THOMPSON, Sidney	Associate Legal Officer
PROSECUTION (OTP)	
BANGURA, Mohamed	Trial Attorney
DIMITROVA, Maja	Senior Case File Manager
HACKLER, Ruth Mary	Trial Assistant
HOLLIS, Brenda	Principal Trial Attorney
HOWARTH, Kathryn	Legal Officer
JOHNSON, James ("Jim")	Chief of Prosecutions
JØRGENSEN, Nina	Senior Appeals Counsel
KOUMJIAN, Nicholas	Senior Trial Attorney
NATHAI-LUTCHMAN, Ula	Legal Consultant
RAPP, Stephen	The Prosecutor
SANTORA, Christopher	Associate Trial Attoney
TAVASSOLIAN, Nargess	Legal Intern
DEFENCE OF CHARLES TAYLOR	
ANYAH, Morris	Co-Counsel
BAKER, Elliot	Legal Intern
BALFAS, Fatiah	Legal Assistant
CAYLEY, Andrew	Co-Counsel
CHAPMAN, Simon	Legal Intern
CHEKERA, Silas	Co-Counsel
DIJKSTAL, Haydee	Legal Intern
FAROOQ, Raja Adil	Legal Intern
GRIFFITHS, Courtenay	Lead Counsel
HAMBRICK, Logan	Legal Assistant
KAMARA, James Tamba	Legal Assistant
LOUGHLIN, Liam	Legal Intern
MOILANEN, Salla	Case Manager
MUNYARD, Terry	Co-Counsel
RAWLINGS, Amina	Legal Assistant
REDDY, Pria	Legal Intern
SUPUWOOD, James	Assistant Counsel
TRZIN, Sanela	Legal Assistant
OFFICE OF THE PRINCIPAL DEFENDER	
CARLTON-HANCILES, Claire	Officer-in-Charge

5/6/09

REGISTRY

KAMARA, Ibrahim	IT-Network HelpDesk Assistant
KAMARA, Karifa	IT Assistant
MANSARAY, Binta	Acting Registrar
SESAY, Lawrence	Chief, Communications & IT
SHEIK, Badhusha	Chief of IT
TOWNSEND, Gregory	Head of Office/Sr. Legal Officer
VAN DEELEN, Laura	Senior Admin. Officer

COURT MANAGEMENT (CMS)

BUNDOR, Joseph	Interpreter
DI FABIO, Marina	Stenographer
FODAY, Edward	Interpreter
GASSAMA, Abdul	Interpreter
IRURA, Rachel	Courtroom Officer
KAMUZORA, Advera Nsiima	Court Management Coordinator
LAIDLAW, Michael	Supervisor/Stenographer
SALLY, Violet	Stenographer
SESAY, Brima Kelson	Chief of Translation Unit
SOWE, Yarabi	Interpreter
THOMASS, Olive	Interpreter
TISHEKWA, Vincent	Court Records Assistant
WILLIAMS, Benedict	Intern/Court Usher
WRIGHT, Sylvester	Supervisor/Interpreter

WITNESS VICTIM SECTION (WVS)

ABU, Miatta	Witness Support Officer
BOCKARIE, Mariama	Witness Support Officer
BUNDUKA, James	Witness Support Officer
FOYOH, Tamba	Witness Support Officer
KAMARA, Adikalie	Witness Support Officer
KAMARA, Kelfala	Witness Support Officer
MOILANEN, Harri	Deputy Chief, WVS
PHILIP, Jackson	Witness Support Officer
PRASAD, Ritu	Senior Support Officer
RABINA, Marko	Witness Protection Officer
RAS, Alex	Senior Protection Officer
SESAY, Manty	Witness Support Officer
SESAY, Nancy	Witness Support Officer

5/6/9