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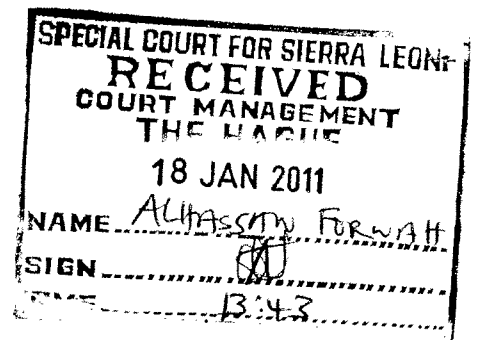


**SPECIAL COURT FOR SIERRA LEONE
OFFICE OF THE PROSECUTOR**

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

Registrar: Ms. Binta Mansaray

Date filed: 18 January 2011



THE PROSECUTOR

Against

Charles Ghankay Taylor

Case No. SCSL-03-01-T

PUBLIC

**PROSECUTION CORRIGENDUM AND MOTION FOR LEAVE TO SUBSTITUTE PAGES OF THE
PROSECUTION FINAL TRIAL BRIEF**

Office of the Prosecutor:
Ms. Brenda J. Hollis

Counsel for the Accused:
Mr. Courtenay Griffiths, Q.C.
Mr. Terry Munyard
Mr. Morris Anyah
Mr. Silas Chekera
Mr. James Supuwood

I. INTRODUCTION

1. On 14 January 2011 the Prosecution filed its “Confidential Prosecution Final Trial Brief.”¹
2. Through administrative oversight during the final editing of the Prosecution Final Trial Brief, the following errors were not corrected. Accordingly, the Prosecution files this corrigendum setting out the corrections to the Final Trial Brief.
3. The Prosecution also seeks leave to substitute three pages of the Prosecution Final Trial Brief, to correct errors made through an administrative oversight during the final editing of the Brief. These three pages are attached in Annex A.

II. CORRIGENDUM

4. The Prosecution corrects its Final Trial Brief as set out in the chart below.

	Location	Original Text	Corrected Text
1.	Page 29, para. 40, line 19	or other victims	of other victims
2.	Page 31, para. 45, line 2	annex	annex
3.	Page 38, para. 57, line 7	of the his subordinates	of his subordinates
4.	Page 40, footnote 212	4 June, 10937	4 June 2008 , p. 10937
5.	Page 59, para. 96, line 4 from below	sets to and	sets and
6.	Page 63, footnote 393	31 March, p. 6224	31 March 2008 , p. 6224
7.	Page 66, para. 112, line 3	<i>The word re-provision appears twice</i>	<i>Delete duplicated word re- provision</i>

¹ *Prosecutor v. Taylor*, SCSL-03-01-T-1156, “Confidential Prosecution Final Trial Brief,” 14 January 2011.

8.	Page 68, para. 116, line 3 from below	while waiting	while awaiting
9.	Page 81, para. 146, line 4 from below	Sankoh, and both of them	Sankoh, both of them
10.	Page 98, para. 186, line 2	on side, they needed ...	on side, for that they needed...
11.	Page 106, para. 206, line 12	to the these forces	to these forces
12.	Page 119, para. 230, line 2	one of more	one or more
13.	Page 121, para. 234, line 6	shipment like , central	shipment was central
14.	Page 167, para. 341, line 2	ability to to forcibly	ability to forcibly
15.	Page 186, para. 373, line 5	RUF radio's	RUF radios
16.	Page 187, para. 374, line 6 from below	as being in wrapped	as being wrapped
17.	Page 191, para. 382, line 7	Smiley	Smillie
18.	Page 215, para. 438, line 7	was well aware	were well aware
19.	Page 227, para. 482, line 6	while his operations was AFRC	While his deputy operations commander was AFRC
20.	Page 251, para. 558, last line	Gullit respond to	Gullit responded to

21.	Page 271, para. 597, line 1	aidning	aiding
22.	Page 275, para. 607, line 1	Sections II - III	Sections IX
23.	Page 275, para. 608, line 8	to the attack and hold...	to attack and hold
24.	Page 278, para. 614, line 1	Section IV	Section IX
25.	Page 287, para. 641, line 5	possible anyone...	possible for anyone...
26.	Page 289, footnote 1749	See Section 11	See Section II
27.	Page 294, para. 660, line 3 from below	regarding to the burning	regarding the burning
28.	Page 389, para. 899, line 1	The The Indictment	The Indictment
29.	Page 458, para. 1080, line 3	days, was a sham as in fact	days, in fact
30.	Page 458, between paras. 1080 & 1081	Tongo Fields	<i>The subtitle Tongo Fields should be on the next line</i>
31.	Page 459, para. 1082, line 6	and give them	and gave them
32.	Page 462, para. 1089, line 5	form 2000	from 2000
33.	Page 471, para. 1119, line 5	used a wives	used as wives
34.	Page 487, para. 1173, last line	carryied	carried

35.	Page 507, para. 1224, line 1	thate	that
36.	Page 511, para. 1234, line 3	that the each	that each
37.	Page 515, para. 1243, line 2 from below	in realityused	in reality used
38.	Page 515, para. 1246, line 1	Taylor admitting	Taylor admitted
39.	Page 516, para. 1248, line 3	form the travel ban	from the travel ban
40.	Page 524, para. 1265, line 5	1998 (1999?)	1999

III. CONCLUSION

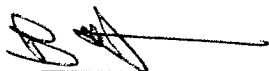
5. The Prosecution:

- (a) corrects the Prosecution Final Trial Brief as set out in the chart above, and
- (b) requests that the Trial Chamber order that three pages of the Prosecution Trial Brief be replaced by the pages attached in Annex A.

Filed in The Hague,

18 January 2011

For the Prosecution,



Brenda J. Hollis
The Prosecutor

INDEX OF AUTHORITIES

Prosecutor v. Taylor, SCSL-03-01-T-1156, “Confidential Prosecution Final Trial Brief,”
14 January 2011

ANNEX A**Corrected Pages of the Prosecution Final Trial Brief**

The following pages of the Prosecution Final Trial Brief are set out in this Annex A:

- Cover page: the list of members of the Office of the Prosecutor was corrected to include Christopher Santora
- Page 2: Contents: The title of Section III.A. in the Contents was corrected to reflect the title of the Section in the Brief.
- Page 30, footnote 147: the text of the footnote was amended to account for the change in the list of members of the Office of the Prosecutor on the cover page and to accurately reflect the status of Mr. Werner



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THE PROSECUTOR

Against

Charles Ghankay Taylor

Case No. SCSL-03-01-T

CONFIDENTIAL

PROSECUTION FINAL TRIAL BRIEF

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I.K. INTRODUCTION TO THE PROSECUTION FINAL TRIAL BRIEF

General

41. The Prosecution files this Brief¹⁴⁷ pursuant to Rule 86(B) and the Scheduling Order.¹⁴⁸ The evidence presented in this case establishes the guilt of the Accused as charged in the Indictment beyond reasonable doubt. Given the considerable volume of evidence led in this case, documentary and testimonial, from both the Prosecution and the Defence in support of the Accused's guilt, it is not possible within the page limit to summarise all the relevant evidence. Therefore, this Brief discusses only some of the most relevant evidence and is a comprehensive but not exhaustive recitation and examination of the evidence. In support of the guilt of the Accused, reliance is placed on the relevant evidence contained in the record as a whole.
42. A key feature of the Prosecution evidence is its overall coherence and consistency, as demonstrated by the support provided by Defence witnesses and exhibits.¹⁴⁹ This feature extends to the evidence provided by Prosecution insider witnesses including those who may be categorized as "accomplice witnesses".¹⁵⁰ The Defence had ample opportunity to test this insider/accomplice evidence via full cross-examination¹⁵¹ assisted by disclosure of prior statements, prior testimony, WVS and OTP disbursements and/or other material disclosed under Rules 66 and 68. The evidence of these witnesses, however, remained unshaken and the Prosecution case undisturbed.¹⁵²
43. All particulars in the Indictment including the crime base are in dispute. Despite Defence statements that it "do[es] not and never [has] taken issue with the fact that

¹⁴⁷ The Prosecution wishes to thank the Chief of Prosecutions, James Johnson, for his invaluable assistance in the writing of this Brief. We also wish to express our gratitude to former Prosecution team member and consultant Alain Werner and former Prosecution team members Shyamala Alagendra, Julia Baly, Kirsten Keith, Ann Sutherland, Nina Jorgensen and Sigall Horovitz. The Prosecutor also wishes to acknowledge the tireless assistance and dedication of the following interns who provided essential assistance in the writing of this Brief: Gil Shefer, Philipp Richter, Nadeah Vali, David Tait, James Pace, Katerina Kappos, Jaqueline Greene, Lena Sokolic, Gordon Brandt and Imogen Parmar.

¹⁴⁸ *Prosecutor v. Taylor*, SCSL-03-01-T-1105, Order Setting a Date for Closure of the Defence case and dates for Filing Final Trial Briefs and the Presentation of Closing Arguments, 22 October.

¹⁴⁹ Corroboration of the Prosecution's case has been provided in large part by Defence witnesses and exhibits as evidenced throughout this Brief.

¹⁵⁰ AFRC Appeals Judgement, para. 127. Note in certain instances abbreviated versions of case citations have been used in the body of the Brief. See Index of Authorities for complete case citations.

¹⁵¹ All the Prosecution's insider/accomplice witnesses testified *viva voce*.

¹⁵² Consideration of the evidence of such insiders/accomplices is in the "interests of justice" (see *Prosecutor v. Ngeze et al.*, ICTR-99-52-I, Decision on the Defence Request to Hear the Evidence of Witness Y by Deposition, Trial Chamber, 10 April 2003, para. 7). The evidence of such witnesses is not *per se* unreliable, especially where they may be thoroughly cross examined (*Prosecutor v. Krajišnik*, IT-00-39-A, Judgement, 17 March 2009, para. 146) but the Trial Chamber must be mindful of the danger of accepting uncorroborated information from such a witness and it should be examined "with caution" (RUF Trial Judgement, paras. 498, 540).