

EXHIBIT G

1

1 UNITED STATES DISTRICT COURT

2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 ESTHER KIOBEL, individually and on behalf : CIVIL
4 of her late husband, DR BARINEM KIOBEL, : ACTION
5 BISHOP AUGUSTINE NUMENE : NO. 02CV

6 JOHN-MILLER, DORNUBARI ANSLEM : 7618
7 JOHN-MILLER, CHARLES BARIDORN WIWA, :

8 ISRAEL PYAKENE NWIDOR, :
9 KENDRICKS DORLE NWIKPO, ANTHONY B, :
10 KOTE-WITAH, VICTOR B WIFA, DUMLE J. :

11 KUNENU, BENSON MAGNUS IKARI, :
12 LEGBARA TONY IDIGMA, PIUS NWINEE, :
13 SIMEON DEDDOA, KPOBARI TUSIMA individually :
14 and on behalf of his late father :
15 CLEMENT TUSIMA, and individually on behalf :
16 Of all others similarly situated: :
17 Plaintiffs :

18 Vs. :

19 ROYAL DUTCH PETROLEUM COMPANY; :
20 SHELL TRANSPORT AND TRADING :
21 COMPANY, p.l.c. :

22 Defendants :

23 KEN WIWA, individually and as : 96 Civ.
24 Executor of the Estate of his : 8386 (KMW)

25 deceased father KEN SARO-WIWA, and :
26 OWENS WIWA, and BLESSING KPUINEN :
27 Individually and as the Administratrix :
28 Of the Estate of her husband, :
29 JOHN KPUINEN, and JANE DOE :
30 Plaintiffs :

31

32 vs. :

33 ROYAL DUTCH PETROLEUM COMPANY and :
34 SHELL TRANSPORT AND TRADING COMPANY :
35 P.l.c. :

36 Defendants :

37 KEN WIWA, individually and as Executor : 01 Civ.
38 Of the Estate of his deceased father : 1909 (KMW)

39 KEN SARO-WIWA, AND OWENS WIWA :
40 And BLESSING KPUINEN, individually :
41 And as the Administratrix of the :
42 Estate of her husband, JOHN KPUINEN, :
43 and JANE DOE, :

44 vs. :

45 BRIAN ANDERSON, :
46 Defendant :

47

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DEPOSITION OF BLESSING ISRAEL

Friday, 28th May 2004

AT: 8.09 am

Taken at:

Benin Marina Hotel
Republique Du Benin
Afrique De L'Ouest
Boulevard De La Marina
BP 1901, Cotonou
Benin

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12

1 A. I have to go the same process I tell you to
2 Cameroon.

3 Q. What did you do when you got back to
4 Cameroon?

5 A. I start fishing.

6 Q. Did you go back to Nigeria any time after
7 December 1993?

8 A. After December 1993 I come back to the
9 2nd June 1994. On 2nd June 1994 I arrive on Oron
10 beach.

11 Q. How did you get from Cameroon to Nigeria on
12 June 22nd 1994?

13 A. I enter boat from Mokangi to that Oron beach.

14 Q. This was the same place that you had arrived
15 in December?

16 MR MILLSON: Object to the form of the
17 question.

18 A. Yes, I arrive in December, the same beach.

19 MR WHINSTON: Can you tell me what happened
20 when you landed in June 22nd 1994?

21 A. As soon as --

22 MR MILLSON: Object to the form of the
23 question.

24 A. I should go?

25 MR WHINSTON: Yes.

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1 A. As soon as I arrive I and my friend, as soon
2 as we arrive in that beach we are coming out from the
3 boat climbing down and saw 11 police, 11 Shell police.

4 Q. Let me stop you right there. Who is the
5 friend that you are referring to?

6 A. My friend is Mr Cabala Bassey.

7 Q. You said you saw 11 Shell police?

8 A. 11 Shell police.

9 Q. How did you know they were Shell police?

10 A. Shell I know them by their vehicle and their
11 uniform.

12 Q. Describe their uniform?

13 A. They used to look neat.

14 Q. What do you mean by neat?

15 A. Keeping yourself presented is neat, keeping
16 their uniform neat.

17 Q. Describe the vehicle?

18 A. The vehicle is black bus.

19 Q. Where was the black bus the first time you
20 saw it?

21 A. The black bus was at the upland.

22 Q. Upland?

23 A. Up behind the house there. So where they
24 came to that jetty when we climb up they asked.

25 Q. Just a second, you said behind the house,

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1 what house?

2 A. One house there, I don't know the owner of
3 the house, but the house is there I can take the --

4 Q. Can you repeat what you just said?

5 A. The house is there. I can take this panel
6 to that place.

7 Q. Okay.

8 A. The bus was parked behind the house.

9 Q. What happened next?

10 A. When we are coming they asked is that an
11 Ogoni man there, they ask is that Ogoni people there.
12 Yes, we have to answer, yes, Ogoni we thought maybe
13 there is message to be for Ogoni people.
14 (The question was read back by the Court Reporter).

15 MR WHINSTON: Were you aware at the time you
16 arrived on Oron beach that there had been an incident
17 in Ogoni earlier that involved the murder of four
18 elders.

19 MR MILLSON: Object to the form of the
20 question.

21 A. When anything like that happened I was not in
22 Nigeria by then, that is my way of returning Cameroon
23 and I was arrested on that Oron beach which was another
24 different state from River State.

25 MR WHINSTON: Who asked you are there any

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1 Ogoni here?

2 MR MILLSON: Object to the form of the
3 question.

4 MR WHINSTON: Who said are there any Ogoni
5 here?

6 MR MILLSON: Object to the form of the
7 question.

8 A. The Shell police ask is that Ogoni there
9 because they are hunting for the Ogoni people.

10 Q. What did you say?

11 A. We answered yes we are Ogoni we thought there
12 was message for Ogoni people. As soon as we accepted
13 that we are Ogoni the batoned me.

14 Q. Tell me what happened next?

15 A. They batoned me.

16 Q. What do you mean by that?

17 A. They use hand baton to hit my head and
18 I faint.

19 Q. Do you have a scar on your head from that
20 blow?

21 A. This is what I have.

22 Q. Could we have a shot of that, please.

23 A. Is what I have from Shell police as soon as I
24 said I am an Ogoni man.

25 Q. What happened to you after you were hit?

16

1 A. They took us into that bus to their station.

2 Q. Where was what you describe as their station?

3 A. When we get down there my friend Mr Cabala
4 Bassey, he is a learned somebody, he can read.

5 Q. Can you read?

6 A. Myself I cannot read, Bassey can read and the
7 name is up there, Shell Police Post.

8 Q. So that is what Mr Bassey told you?

9 A. Yes, when we arrived there they chain my leg
10 together put us both inside the cell.

11 (The question was read back by the Court Reporter).

12 MR WHINSTON: How long did it take to get
13 from when you got on the bus to when you arrived at
14 what you describe as the Shell police station?

15 A. From the beach to the station they give us 10
16 minutes time.

17 Q. Had you ever been at that building before?

18 A. Huh?

19 Q. Had you ever been in what you described as
20 the Shell Police Station before that day?

21 MR MILLSON: Object to the form of the
22 question.

23 A. As soon as we arrived there the --

24 MR WHINSTON: Listen to my question: had
25 you ever been to the building you described as a police

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17

1 station before June 22nd before?

2 A. I have not been described but it is that time
3 I describe that day.

4 Q. So that was the first time you had ever been
5 there?

6 A. Yes.

7 MR MILLSON: Object to the form of the
8 question.

9 A. I had been in that same police custody.

10 MR MILLSON: Can you read back that answer?
11 (The question was read back by the Court Reporter).

12 MR WHINSTON: What do you mean by that?

13 A. The first time I am entering that police,
14 that is the first time I am entering that police post.

15 MR WHINSTON: Can you describe to me what
16 happened at the Shell police post?

17 MR MILLSON: Object to the form of the
18 question.

19 A. That police, the Shell police post there is
20 upstairs.

21 MR WHINSTON: Sorry?

22 A. It is upstairs, why it is down, the following
23 day being on the 23rd they brought us from that cell.
24 They took from us that cell to the interrogation room,
25 to make a --

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1 MR MILLSON: Can you read that back please,
2 and the question.

3 (The question and answer was read back by the Court
4 Reporter).

5 MR WHINSTON: To make a what?

6 A. To make a statement.

7 Q. Describe the building, what you called a
8 Shell police post, I want you to describe the building
9 to me as best you can?

10 A. That Shell police post they build it.

11 Q. Sorry?

12 A. They build it round, like this, from a --

13 Q. It is round?

14 A. It is round. There is this entrance to that
15 police. As soon as you come in this is the cell, way
16 up is upstairs.

17 Q. What is upstairs?

18 A. Huh?

19 Q. How many floors does the building have?

20 A. I have not climb all the steps. They just
21 brought us into that cell and bring us to the
22 interrogation room the following day.

23 Q. Okay. I thought you said something about
24 upstairs in one of your earlier answers?

25 A. The building is upstairs, what we mean by

1 upstairs one room is down and one room is up.

2 Q. Okay. But what part of the building were
3 you held in?

4 A. Colour? I thought maybe he said colour.

5 Q. What part of the building was the cell that
6 you were put in, where was the cell that you were put
7 in?

8 A. I don't understand.

9 Q. Was it on the ground floor or first floor?

10 A. They took us to the downstairs and obtained a
11 statement.

12 Q. They put you first in the cell, right?

13 A. The first time we came from the beach
14 straight to the cell.

15 Q. Where was the cell from when you entered that
16 building?

17 A. As you are coming into that yard the cell is
18 opposite and then they bring us by the left side to the
19 interrogation room.

20 Q. What happened in the interrogation room?

21 A. In that interrogation room I sit down and one
22 policeman who obtained my statement, he ask why the
23 blood is coming out of the injury I have. They asked
24 me why we Ogoni do not allow Shell to operate in
25 Ogoniland. I am asking is that why I am arrested.

1 Q. What did he say to you?

2 A. He said I should not joke with him, if I play
3 with other Nigerian police I should not play with
4 him. He is a Shell police, I said is that why we were
5 arrested. I ask him why we are arrested.

6 Q. What did he say?

7 A. He said, yes, he cannot deny it. He said I
8 should not joke with him. This is not ordinary
9 Nigerian police, it is the Shell police.

10 Q. What other questions did he ask you and what
11 other answers did you provide?

12 A. He asked me do I know Ken Saro Wiwa.

13 Q. Do you know Ken Saro Wiwa?

14 A. I say yes. He said did I know NYCOP and I
15 said ah, I know NYCOP. He said me do I know anything
16 about vigilante. I said, yes, all those organisation
17 is still in Ogoniland. He said, okay, but can we
18 allow Shell to operate in Ogoniland. I said the
19 matter is above me.

20 Q. What happened next?

21 A. What happened, he get me 50 strokes of
22 kobokey.

23 Q. What is a kobokey?

24 A. Kobokey, cable.

25 Q. A cable?

21

1 A. Yes, to flog me 50 times.

2 Q. Where did he flog you, what part of your
3 body?

4 A. He flogged me to accept that Shell should
5 operate in Ogoniland.

6 Q. What part of your body did he hit with the
7 koboke?

8 A. All my body.

9 Q. Do you have any injuries from that beating?

10 A. Of that koboke.

11 Q. Yes?

12 A. At that Shell police?

13 Q. Yes?

14 A. No.

15 Q. Had you ever met Ken Saro Wiwa?

16 A. Meet him?

17 Q. Yes.

18 A. I no meet Ken Saro Wiwa but when I was in
19 Cameroon I heard things is happening in Ogoniland.

20 MR MILLSON: Can I hear that answer read
21 back.

22 (The question was read back by the Court Reporter).

23 MR WHINSTON: What was NYCOP the police
24 officers asked you about?

25 MR MILLSON: Object to the form of the

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1 question.

2 A. NYCOP is the organisation in Ogoni and that
3 is I know NYCOP, I don't know their jobs because I am
4 not a member of NYCOP.

5 Q. The police officers asked you about
6 vigilantes, what are vigilantes?

7 MR MILLSON: Object to the form of the
8 question.

9 A. To alert, the jobs of the vigilante in
10 Ogoniland is to alert people when Shell will come and
11 military come so people can run away, to alert them.

12 MR WHINSTON: Were you a member of any
13 vigilante group?

14 A. I am not a member.

15 Q. Were you ever a member?

16 A. No.

17 Q. Were you asked -- strike that. How long were
18 you held at the building that you described as a Shell
19 police post?

20 MR MILLSON: Object to the form of the
21 question.

22 A. Say how long?

23 MR WHINSTON: How long were you there?

24 A. I stayed there one week.

25 Q. Did you receive any other beatings other than

1 that time that you have already described?

2 A. Yes, we did. They wanted to transfer us to
3 River State and give us 30, 30 times of the koboke and
4 they put us into that bus.

5 Q. When you say us who do you mean?

6 A. Me and my friend.

7 Q. And your friend is Mr?

8 A. It was Bassey.

9 Q. Were you asked to sign anything while you
10 were at the Shell police station?

11 A. When, after they obtained the statement,
12 I asked the man to read to my own understanding, and he
13 read to my own understanding and I complete.

14 Q. You thumb printed it?

15 A. Yes.

16 Q. What do you remember the man reading?

17 MR MILLSON: Object to the form of the
18 question?

19 A. The same statement as I say here, it is what
20 I read. It is what I complete. That matter is above
21 me. What I am saying is that the matter is above me,
22 when they read that I say that the matter is above me
23 for a kid as I am, to allow Shell to come to Ogoniland
24 the matter is above me. I have to thumb print.

25 Q. Where were you taken from that police

1 station?

2 A. They take us from that police station to Kpor
3 in River State.

4 Q. How did you get from the police station that
5 you have just described to Kpor?

6 A. When they take us from that Oron to Kpor,
7 they put us into that bus and they did not allow us,
8 allow me to see outside. We were just inside.

9 Q. Why couldn't you see outside?

10 A. Why I couldn't see outside is because they
11 don't want us to raise our heads. We were just down
12 kneel into that bus.

13 Q. So you were not sitting on seat?

14 A. I cannot see outside. Where I could see
15 outside was Kpor. Kpor, Kpor.

16 Q. I said she is Irish be patient with her.
17 How did you know where you were when you got off the
18 bus?

19 A. Excuse me?

20 Q. You said the bus took you to Kpor?

21 A. Yes.

22 Q. How did you know that?

23 A. When we get to Kpor they bring us, they took
24 us from inside the bus, then we have to see the bus and
25 the bus reverse the bus. One of police, one of the

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1 police have to hand us over to Okuntimo.

2 Q. How did you know where you were?

3 A. At Kpor?

4 Q. Yes?

5 A. That is my land, I know Kpor.

6 Q. Where in Kpor did the bus leave you?

7 A. Leave me right there in Kpor.

8 Q. Where in Kpor?

9 A. That is where Okuntimo is, at that police
10 post. That police station in Kpor is where the
11 military camp.

12 Q. So it was a police station?

13 A. Yes.

14 Q. Who was there to meet you when you got off
15 the bus?

16 A. When I got off the bus me and my friend they
17 hand over the two of us to Okuntimo.

18 Q. How do you know the person that they handed
19 you over to was Okuntimo?

20 A. Okuntimo was sitting down.

21 Q. Sorry?

22 A. He was sitting down and he has one eagle, one
23 eagle there.

24 Q. Pointing to your shoulders?

25 A. I show him? He said we should lie down.

1 Q. Wait a second. I want to make sure that the
2 written record reflects that when you said he had one
3 eagle here and one eagle here were you pointing to your
4 shoulders?

5 A. He was sitting down as you are and they bring
6 us and hand over to him. We stand like this and say
7 this is the people.

8 Q. Did he tell you what his name was?

9 A. Pardon?

10 Q. Yes.

11 A. He did not but my long time staying there,
12 within that one week staying there I knew it was
13 Okuntimo.

14 Q. What happened next?

15 A. What happened, he ordered Habila.

16 Q. Who is Habila?

17 A. Is OC Mobile River State. He order him to
18 give us 150 strokes of koboke.

19 Q. Did he have any conversation, did Okuntimo
20 have any discussion with you before he made that order?

21 A. Before he made that point?

22 Q. Yes?

23 A. He said, are you listening, before I make
24 that point he saw my passport and couchon that
25 permitted me to stay in Cameroon.

124

1 A. Repeat that again for my own understanding.

2 Q. Mr Bassey said; don't run away because our
3 possessions are on the beach?

4 A. Mr Bassey say I should not run away.

5 Q. Because all your goods were on the beach,
6 right?

7 A. I am not understanding, we are going what?
8 Mr Bassey and I we did not run, we were just like that
9 and they arrest us.

10 Q. And the Shell staff and police approach you,
11 Mr Bassey first and asked if you were from Dwara and
12 Bomu, right?

13 A. Repeat for my own understanding.

14 (The question was read back by the Court Reporter).

15 MR WHINSTON: And approached Mr Bassey first.

16 A. What they ask is Ogoni, they do not ask
17 whether you are from Bori or from such; are you Ogoni
18 man. We have to identify ourselves as Ogoni, we told
19 us that we thought there was a message for Ogoni people
20 and we were arrested. I made my statement here.

21 Q. Mr Bassey said you were from Bomu and that
22 you were a fisherman based in Cameroon and that he came
23 along with other brothers right?

24 A. He come with?

25 Q. With other brothers?

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1 A. I don't think that Bassey mentions a
2 statement like that.

3 Q. And you lost all of your electronics, cash
4 and clothes, right?

5 MR WHINSTON: Object to the form of the
6 question.

7 A. Repeat again, I left what?

8 MR MILLSON: You lost all your electronics
9 cash and clothes, correct.

10 MR WHINSTON: Object to the form of the
11 question.

12 A. We didn't come with electronics, I made my
13 statement from time to time here, that we didn't come
14 with any electronics.

15 Q. And while you were in jail the son of the
16 chief of Benson Beach waterside came to talk to you,
17 correct?

18 A. Repeat again.

19 (The question was read back by the Court Reporter)

20 Nobody come.

21 Q. There wasn't anyone, the son of the chief of
22 Benson Beach waterside didn't come?

23 A. I don't know the son of that man who owned
24 the beach.

25 Q. The beach was --

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126

1 A. I do not even know the man who owned that
2 beach.

3 Q. The beach was called Benson Beach?

4 A. I don't know the owner of the beach. I
5 don't know the man. I don't know his son. I am not
6 staying there.

7 Q. Did you know the beach was call Benson beach?

8 A. It is that beach, that is the name and that
9 beach is Akwa-Ibom State, we call it beach.

10 Q. You were picked up after five days at what
11 you say was the Shell police station, right?

12 MR WHINSTON: Object to the form.

13 A. Say.

14 MR MILLSON: You were picked up after five
15 days at the Shell police station, correct?

16 A. Beat up?

17 Q. You spent five days at the Shell police
18 station, correct?

19 A. I spend one week.

20 Q. At the end of one week a combined forces team
21 made up of Army, Mobile, police, Air Force and regular
22 police came, correct?

23 A. To Oron?

24 Q. Yes.

25 A. No, it was the Shell staff took us to Kpor

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1 A. I don't know how to read and did not read
2 what they to write, but it was a Shell bus.

3 MR MILLSON: And you know it is a Shell bus
4 because it is black?

5 A. It is black.

6 Q. That is why you know it is a Shell bus?

7 A. Even right now they are using that black bus,
8 Shell police will enter that black bus as soon as you
9 saw the police inside that black bus, it is Shell
10 police. When you saw the government police, government
11 police have to use what we call Station Wagon by then.
12 A Station Wagon, they are their own motor. It is now
13 the Government of Nigeria issue what they call jeep to
14 each of the local governments, because police are using
15 jeep.

16 Q. You knew it was a Shell bus because the
17 Nigerian Government only had Station Wagons?

18 A. Nigeria police have Station Wagon as I am
19 telling you, and that bus is made for all the staff,
20 meant for police staff, as I am telling you, meant for
21 Shell police. So we enter that black bus to Kpor.

22 Q. You recognise the Shell bus because it is a
23 black bus --

24 A. It is black bus, even when they arrest us
25 from the beach they put us into that bus and it is in

129

1 that bus we enter to the station. This one week we
2 spend when they are going to hand us over to Okuntimo,
3 hand us over to Okuntimo in Kpor and then go back.
4 They hand over us to Okuntimo. Even if Okuntimo come
5 here he will accept, and one thing I have to tell you
6 that in Nigeria truth is bitter.

7 MR WHINSTON: What bitter?

8 A. Truth is bitter in Nigeria, but if Okuntimo
9 come here he would accept, as I am telling you, that
10 the Shell staff, the Shell police took us from Oron and
11 hand over him to him -- hand over us to him.

12 Q. Did you tell your lawyers who are here today
13 in September 2003 that you had been in a Shell police
14 station in Oron?

15 MR WHINSTON: Object to the form of the
16 question, and I am going to instruct the witness not to
17 answer.

18 MR MILLSON: Did you tell your lawyers.

19 MR WHINSTON: I instructed the witness not
20 to answer.

21 MR MILLSON: Withdrawn. You met with your
22 lawyers in 2003 in Lagos, right?

23 A. 2003.

24 Q. In Lagos?

25 A. In Lagos?

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130

1 Q. Right.

2 A. I did not meet my lawyer in Lagos.

3 Q. Did you meet your lawyer in Port Harcourt?

4 A. I met my lawyer, I was in the village. They
5 send me a message come -- got a message my lawyer needs
6 me in Port Harcourt and I go.

7 Q. Who gave you that message?

8 A. That is not the issue of the floor here.

9 Q. Who gave you the message?

10 A. That my lawyer need me?

11 Q. Yes.

12 A. That is not the issue of the floor. I have
13 a message that my lawyer need me in Port Harcourt.
14 I hope that is not the issue, and my lawyer not deny he
15 see me. So somebody who sends me, who give me the
16 message is not important.

17 Q. Who gave you the message?

18 A. That is not important on the floor here.
19 Somebody who tell me that my lawyer need me and you
20 wanted to know what. Why you want to know that
21 person?

22 Q. Someone told you in person, right?

23 A. Somebody came and met me that my lawyer need
24 me in Port Harcourt and I go.

25 Q. Who was it that came to meet you?

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131

1 A. Repeat again.

2 Q. Who was it that came to meet you?

3 A. I have told you that time the number of that,
4 somebody come, but what do you want to do with that
5 person who give me that message? It is like you have a
6 personal interest in that person. They give me
7 message, give message to every of the 19 and every of
8 the 19 has been there.

9 Q. So somebody came to see you and said that
10 each of the 19 was being asked to go and talk to the
11 lawyers?

12 A. Agree and I will go.

13 Q. And you all went?

14 A. We went in daytime not night. We pay or
15 transportation and go there.

16 Q. They paid your transportation?

17 A. No, we pay our transportation.

18 Q. And all 19 of you were there?

19 A. That day in Port Harcourt.

20 Q. Yes?

21 A. Everybody was there.

22 Q. All 19 was there?

23 A. Yes, all 19 was complete in that place that
24 day.

25 Q. And you met with Mr Whinston, was he there?

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1 A. Who is that Whinston?

2 Q. The man next to you, was he there?

3 A. I did meet this in Port Harcourt but I met
4 Carrie.

5 Q. And Carrie D'Avino said you were his lawyer?

6 A. Carrie is my lawyer.

7 Q. And he told you that?

8 A. That is.

9 Q. That he was your lawyer?

10 A. Carrie is my lawyer.

11 Q. Did he tell you that?

12 A. He is the lawyer for the Ogoni people.

13 Q. He is the lawyer for the Ogoni people?

14 A. Yes, sent by the whole Ogoni in the United
15 States of America. Both home and abroad he is our
16 lawyer.

17 Q. So the Ogoni in the United States sent
18 Mr D'Avino to be your lawyer?

19 A. He is our own lawyer, our lawyer as Feme
20 Falana was our lawyer.

21 MR MILLSON: Was this the first time that
22 you had had any dealings with the Ogoni Class Action?

23 A. Repeat again.

24 MR MILLSON: Was the message that you got
25 that your lawyer wanted to see you the first time that

1 you had any contact about the Ogoni Class Action?

2 A. The Class Action case, what we mean by Class
3 Action case? This is my first time appearing on
4 deposition.

5 Q. That I can believe.

6 A. Without the operation the case cannot go on,
7 so this is my first time appearing before deposition.

8 Q. When was the first time anyone raised with
9 you the idea of giving a deposition?

10 A. Before?

11 Q. Yes?

12 A. Nobody.

13 Q. Nobody?

14 A. No.

15 Q. When did you first hear about your lawyer in
16 the United States?

17 A. Repeat that question to my own understanding.

18 Q. When did you first hear that you had a lawyer
19 in the United States?

20 A. When do I hear that I have a lawyer?

21 Q. Right.

22 A. It is when I am in the village and they come
23 and need me in Port Harcourt.

24 Q. That was the first time that you had heard?

25 A. That was the first time I met Carrie.

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134

1 Q. Was that the first time you heard there was a
2 lawyer?

3 A. In the United States of America?

4 Q. Yes, right?

5 A. In the village we have to Feme Falana we have
6 lawyer in Nigeria, so I have no any knowledge to the
7 lawyer in the United States of America, that was my
8 first time appearing before that Carrie D'Avino.

9 Q. The time that you got the message that your
10 lawyer, Carrie D'Avino, wanted to speak to you, was
11 that the that the first time you heard that you had a
12 lawyer in the United States?

13 A. I made my statement at that time. Look
14 I make it several times, it is only one time I meet
15 Carrie D'Avino. When I got the message to go to Port
16 Harcourt that a lawyer is there waiting, I go. The
17 other 19 of us come.

18 Q. Did the 19 of you all meet with Mr D'Avino
19 together?

20 A. We meet him, the 19 of us meet him.

21 Q. Were you all together in a room?

22 A. I don't understand. I am telling you time
23 without number that we meet our lawyer, he is our
24 lawyer, we meet him.

25 Q. All together?

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135

1 A. I have told you from time to time we will
2 meet him, he is my lawyer.

3 MR WHINSTON: What he wants to know, of all
4 the 19 and Mr D'Avino, I think what he wants to know?

5 A. Yes.

6 MR WHINSTON: Wait, wait. If all the 19
7 and Mr D'Avino were in the same room together at the
8 same time?

9 A. We came. They put us in one room and
10 D'Avino come and see all of us.

11 MR MILLSON: What did you all say to
12 Mr Davino?

13 A. Our people met --

14 MR WHINSTON: I object to the question on
15 the basis of privilege and I instruct the witness not
16 to answer.

17 MR MILLSON: Are you going to follow his
18 instruction?

19 A. The instruction of my lawyer?

20 MR WHINSTON: Yes.

21 A. Yes, he is my lawyer.

22 MR WHINSTON: Move on.

23 MR MILLSON: You always have to ask.

24 MR WHINSTON: You just did.

25 MR MILLSON: Thank you.

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1 A. I follow my lawyer.

2 Q. Did Mr D'Avino take notes during this meeting
3 with the 19 of you?

4 A. Repeat again.

5 Q. Did Mr D'Avino take notes of what you were
6 all saying?

7 A. Make notes?

8 Q. Did he write down what you were saying?

9 A. How much? I don't understand what you mean,
10 come to my own understanding.

11 Q. You were meeting with Mr D'Avino you met him
12 once?

13 A. I met him once.

14 Q. How many times have you met Mr Whinston?

15 A. You talk about Mr Whinston, this is the first
16 time seeing this man. I did not know him, he did not
17 know me. I know Carrie D'Avino but I did not know
18 this man in person. This is the first time I know
19 him.

20 Q. Did you ever talk to him on the telephone?

21 A. This man on telephone?

22 Q. Right?

23 A. I don't know the number to call him.

24 Q. Did you ever talk to him on the telephone?

25 A. This man, talk to this man on telephone?

137

1 Q. Yes.

2 A. I don't have a number. How will I just talk
3 to somebody that I don't have the number. I don't have
4 your number, how will I talk to you?

5 Q. Did he ever call you?

6 MR WHINSTON: If I didn't talk to him on the
7 phone how can I talk to him? Can't we move on to
8 something more productive?

9 MR MILLSON: If the witness would answer my
10 question.

11 A. No ever time talk to me on phone. Never
12 ever any time I talk to him on phone.

13 MR MILLSON: That makes it clearer, thank
14 you. Did you ever talk to Mr D'Avino on the phone?

15 A. Since I met D'Avino, Carrie D'Avino in Port
16 Harcourt this is my second time seeing him.

17 Q. That was yesterday?

18 A. Yesterday?

19 Q. That you saw Mr D'Avino?

20 A. I saw him now myself, I saw he was there.

21 Q. Did you see him yesterday?

22 A. No, I did not see D'Avino yesterday. Today I
23 see him.

24 Q. When was your meeting with Mr D'Avino in Port
25 Harcourt?

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1 A. When?

2 Q. When?

3 A. The actual date, I forget the actually date.

4 Q. Was it in 2003?

5 A. No, I did not meet D'Avino in 2003. I met
6 D'Avino in Port Harcourt last year.

7 Q. Last year was 2003?

8 A. Yes, 2003, but the date has escaped my
9 memory.

10 Q. Was it September 2003?

11 A. The date of the month has escaped my memory.

12 Q. Now, did you tell Mr D'Avino that there was a
13 Shell police station in Port Harcourt?

14 MR WHINSTON: Objection, I instruct the
15 witness not to answer.

16 MR MILLSON: The relevance of this --

17 MR WHINSTON: Shell police station in Port
18 Harcourt?

19 MR MILLSON: Let me ask you again. Did you
20 tell Mr D'Avino in Port Harcourt when you met with him
21 that there was a Shell police station in Oron?

22 MR WHINSTON: Objection, and I instruct the
23 witness not to answer.

24 MR MILLSON: Mr Whinston, you put on
25 testimony today that there is a Shell police station in

139

1 Oron. You should have checked to see if there was a
2 police station in Oron?

3 A. It is like I am not --

4 MR WHINSTON: This is a discussion between
5 the lawyers. Why are you taking up the deposition
6 time for that question.

7 MR MILLSON: I believe you have put on
8 perjurious testimony.

9 MR WHINSTON: You are entitled to believe
10 whatever you want.

11 MR MILLSON: We are going to take discovery
12 on that.

13 MR WHINSTON: You may try to do whatever you
14 may want to, and let's, we have a witness here, let's
15 ask questions of the witness; proper questions.

16 MR MILLSON: You say when you came to the
17 beach there were 11 Shell police, correct?

18 A. When I come from the water climb, there is 11
19 police coming in hunting for the Ogoni people.

20 Q. And they told you we are hunting for the
21 Ogoni people, right?

22 A. Their behaviour said they are hunting for the
23 Ogoni people.

24 Q. You counted them, right?

25 A. Repeat again.

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1 Q. You counted the 11 Shell police?

2 A. When they just come out they are 11 in
3 number.

4 Q. Can you count?

5 A. One, two, three, four, five, six, seven,
6 eight, nine, 10, 11.

7 Q. You knew them by their uniform, right?

8 A. I know Shell police by their uniform that
9 they have to look neat and they are capable of keeping
10 themselves neat.

11 Q. You discussed this invention of the neat
12 uniform with Raphael, correct?

13 MR DI CAPRIO: Objection to form.

14 MR WHINSTON: Objection to form. Object to
15 the form of the question. You can answer.

16 MR MILLSON: You and Raphael sat in the
17 compound here in Benin and decided together that the
18 two of you would describe the Shell uniform as neat,
19 right?

20 MR WHINSTON: Object to form.

21 MR MILLSON: Right?

22 MR WHINSTON: Object to form.

23 MR MILLSON: You may answer.

24 MR WHINSTON: You may answer. Do you
25 understand the question?

141

1 A. I don't understand your question. I should
2 answer you?

3 MR WHINSTON: You should answer.

4 A. You said I meet who?

5 MR MILLSON: Raphael?

6 A. Raphael?

7 Q. Do you know a Raphael?

8 A. I don't know that, who is that kind of name,
9 is it the lawyer?

10 MR MILLSON: How many people live in the
11 compound together here in Benin who are in the witness
12 protection?

13 MR WHINSTON: Object to the form of the
14 question.

15 A. I don't know others.

16 MR MILLSON: You don't know others?

17 A. Somebody appearing before you?

18 MR MILLSON: Right, seven of you live
19 together, right?

20 A. I left, I lived alone in my own where I
21 live. I don't know the other.

22 Q. Seven of you live together, right?

23 A. Live together?

24 Q. Right?

25 A. What do you mean by live together?

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142

1 Q. Right?

2 A. That means we live in the same place, I don't
3 know the other person you talk about. I don't know
4 those people you are talking about.

5 Q. Eubu Jackson lives there, right?

6 A. Who is answering that name?

7 Q. You don't know someone named Eubu Jackson?

8 A. Eubu, who is that other person?

9 Q. Do you know a Raphael who lives there with
10 you?

11 A. Who is that person?

12 Q. Do you know a Boniface who lives there?

13 A. Where was that person, I don't know all those
14 people.

15 Q. Do you know a Vincent who lives there?

16 A. Vincent? You are asking me, somebody I don't
17 know.

18 MR WHINSTON: Can we take break for a
19 minute.

20 MR MILLSON: No.

21 MR WHINSTON: Would you come with me.

22 MR MILLSON: What where Prince, about a Lete
23 who lives there?

24 MR WHINSTON: Could you come with me for
25 just a minute, please.

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143

1 THE VIDEOGRAPHER: Off-the-record at 11.59
2 am.

3 THE VIDEOGRAPHER: Back on record at 12.01
4 pm

5 (Off the record).

6 MR MILLSON: Now the 11 Shell police that
7 you saw, were they wearing badges?

8 MR WHINSTON: Excuse me for just a minute.
9 We took a break because I felt that Mr Israel did not
10 understand the questions that you were asking him about
11 the people he lived with.

12 MR MILLSON: This is the second witness that
13 you had lie about the people who they live with. I am
14 going to leave that any way you want.

15 MR WHINSTON: The witness would like to
16 correct his testimony because he now understands the
17 questions.

18 MR MILLSON: You should have done this when
19 the witness lied yesterday about it. Let's go on.
20 Were the 11 Shell police wearing any particular badges?

21 A. What does he mean by particular badges?

22 Q. Describe what a Shell policeman looks like?

23 A. Shell police have to look neat.

24 Q. Anything else other than neat?

25 A. Ah? They are capable of keeping themselves

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151

1 A. I answer it?

2 MR WHINSTON: You should answer it.

3 A. You said the prison. Repeat your question
4 again for my own understanding.

5 MR MILLSON: So you are taken away on the
6 bus and you are taken to Kpor, right?

7 MR WHINSTON: Now we are in Kpor, now we are
8 shifting gears, you are confusing me even. Go ahead,
9 sorry.

10 MR MILLSON: Right.

11 A. I said they put us into that bus from Oron to
12 Kpor and hand over us to Paul Okuntimo.

13 Q. Then you went from Kpor to SIB?

14 A. From Kpor to SIIB.

15 Q. In the same bus?

16 A. Huh?

17 Q. In the same bus?

18 A. Not that same bus, it is the military take us
19 into their own motor to SIIB. I make that statement
20 clear, not in that bus.

21 MR MILLSON: I have no further questions.

22 MR WHINSTON: I have a few but before I do
23 it I want to go back to the questions Mr Millson asked
24 just before we took this last break, so if you can.
25 Sorry to ask you to do this.

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152

1 MR MILLSON: Why don't we take a short
2 break.

3 THE VIDEOGRAPHER: Off-the-record at 12.11
4 pm.

5
6 (Short Adjournment).

7 THE VIDEOGRAPHER: Back on the record at
8 12.23 pm

9
10 Re Direct Examination by MR WHINSTON.

11 Q. Mr Israel, just a few questions to conclude
12 the deposition. Who do you live with now?

13 A. As of now?

14 Q. Yes?

15 A. I live with my brothers.

16 Q. Who do you mean by your brothers?

17 A. I live with Lete, I live with Vincent.

18 I live with Raphael, Jackson. I live with Boniface.

19 I live with Prince. That is the people who I remember
20 that I live with. Raphael is there.

21 Q. Yes, you mentioned him already. Did you
22 know any of those people in Nigeria?

23 A. Before?

24 Q. Yes.

25 A. I have no, I have not known them before.

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1 Q. Sorry?

2 A. I don't know them before.

3 Q. You live with them here in Benin?

4 MR MILLSON: Object to the form of the
5 question.

6 A. Yes, I live in Benin.

7 MR WHINSTON: When did you come to Benin?

8 A. I came to Benin, I like Benin. I left
9 Nigeria on 22nd December last year.

10 Q. Now I want to bring you back to the building
11 that you have described as the Shell police station.
12 Can you tell me everything that you remember of what
13 was around that building?

14 A. I made my statement clearly that the Shell
15 police post is here. Then when they bring us and put
16 us into that place and I will come out of the post,
17 they put us to the cell. Then after one week when they
18 are taking us out, do you understand me?

19 Q. Umm hmm.

20 A. Shell police, Shell police post is here,
21 while a guard, let me say about two minutes trekking
22 they have a Shell Oil field there.

23 Q. Are there any buildings between what you
24 describe as the Shell police station and the oil field?

25 A. A building.

1 Q. Yes?

2 A. Within Shell police station and the oil
3 field?

4 Q. Between the two, yes?

5 A. The distance?

6 Q. No,, there a building there?

7 A. The building, the Shell police custody there
8 is upstairs.

9 Q. By that, what do you mean by upstairs?

10 A. Upstairs another room, another room is up.
11 I don't know if people live in the top.

12 MR WHINSTON: I am going to draw something
13 that says, it has, I am going do draw a box in blue and
14 I am going to draw a circle in blue and I want you to
15 think of the box as the Shell police station, okay. I
16 want you to think of the circle as the oil field.
17 What I am asking you, is there any building, any
18 structure between the Shell police station and the
19 Shell Oil field?

20 A. As you are coming out of that Shell police
21 station, I have made my statement time out of number.
22 The location is in the front, I don't know whether
23 people call oil field, I don't know but the location is
24 in the front. As you just come out on your left you
25 go, so there is a village at front whom the motor will

1 take you go. I made my statement before you.

2 Q. Okay. I want to make sure that I understand
3 it. So what do you see when you come out the front of
4 the Shell police station?

5 MR MILLSON: Object to the form of the
6 question.

7 A. When you come to the Shell police station or
8 when you come out?

9 MR WHINSTON: When you come out?

10 A. When you come out the location is in the
11 front.

12 Q. What do you mean by the location?

13 A. I don't know how you people call it,
14 location, it is where Shell have their properties.
15 That is what I mean by location.

16 Q. What kind of properties did they have there?

17 A. The property, using their property to drill
18 the oil.

19 Q. Were you able to see oil wells from the
20 police station?

21 A. If you stayed that police station, we saw
22 it. I can move the Panel to that place.

23 Q. Were you able to see oil wells from the
24 police station?

25 A. What is the meaning of oil well?

1 Q. Where you able to see where they were
2 drilling for oil from the police station?

3 A. You will not see the oil but their properties
4 is there. They used wire to wire the place, barbed
5 wire and it has entry.

6 Q. Now you made mention of a village that
7 existed?

8 A. That village?

9 Q. Yes. Tell me where the village was in
10 connection with the Shell police station and what you
11 called the Shell location?

12 A. The distance?

13 Q. Where was it, to the left or right, behind
14 you, in front of you?

15 A. As you are coming from Oron beach and enter
16 that motor I have made my statement it will take you 10
17 minutes. As soon as you arrive you are passing
18 village throughout, both left and right is village.
19 Then the Shell police post is in the back of the
20 village.

21 MR WHINSTON: I have no further questions.

22

23

24

25

1 Further Cross-Examination by MR MILLSON.

2 Q. Did you say there are Shell Oil wells in
3 Oron?

4 A. I will take you, it is there.

5 Q. Have you taken your lawyers to the Shell Oil
6 fields in Oron?

7 MR WHINSTON: He said he hasn't been back,
8 asked and answered. Objection to the form of the
9 question.

10 MR MILLSON: Have you taken your lawyers to
11 the Shell Oil fields in Oron?

12 MR WHINSTON: Asked and answered, you can
13 answer the question again.

14 A. Should answer the question.

15 MR WHINSTON: Yes.

16 A. I have not taken my lawyer to the place, but
17 it is there, I can take you.

18 MR MILLSON: How do you know that it is a
19 Shell Oil field then?

20 A. It is a Shell Oil field.

21 Q. How do you know it is a Shell Oil field?

22 A. Shell property.

23 Q. How do you know?

24 A. Once you come up any location as in Cadrey
25 you have to know it is Shell.

158

1 Q. How do you know, you told us you knew it was
2 a Shell police post because your friend told you it was
3 written on the building?

4 A. Yes, those instrument that Shell have in
5 Cadrey, that instrument is there. They have to wire
6 it. So it is there. I will take you, including my
7 lawyer to that place. If you are not living in that
8 place you better go back to that place and find out
9 before you came.

10 Q. How do you know it is not some other
11 company's oil field?

12 A. Repeat again.

13 Q. How do you know it is not some other
14 company's oil field?

15 A. Shell police post cannot be there, then
16 another company will have their own property in the
17 front.

18 Q. So you agree that if there can't isn't a
19 Shell Oil field --

20 A. It is because of the Shell Oil field that
21 makes the police to be there.

22 MR MILLSON: Mr Whinston, you have a
23 problem. Okay, you came on December 22nd 2003 to
24 Benin with your six brothers?

25 MR WHINSTON: Object to the form of the

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1 question.

2 A. I should answer?

3 MR WHINSTON: Yes.

4 A. I came alone.

5 MR MILLSON: And your six brothers were
6 already here staying in the same house?

7 A. After, let me see, two days, we meet our
8 seven. We did not come one day.

9 Q. Your brothers, some of your other brothers
10 have been providing you money since December 22nd,
11 correct?

12 A. Some of my brothers?

13 Q. Correct.

14 A. Ogonis?

15 Q. Right.

16 A. Yes, Ogoni used to give us money to pay for
17 us pay for our house.

18 Q. So the house that you are staying in is paid
19 by the Ogoni brothers?

20 A. Yes, paid by the Ogoni brothers.

21 Q. How long have the Ogoni brothers being paying
22 you?

23 A. Since we arrive in this place, we arrived
24 this place on 23rd December. We left Nigeria, as soon
25 as we enter motor from Lagos we are going to enter the

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160

1 bus from Port Harcourt to Lagos, we will spend one full
2 night. Then once you get to Lagos you will now enter
3 motor to Awade, then from Awade you get to Benin, which
4 is the border here.

5 Q. Did the Ogoni brothers pay you before
6 December 22nd?

7 A. I don't know the actual day they pay but the
8 Ogoni are taking care of us.

9 Q. The Ogoni, how often have the Ogoni given you
10 money since December 22nd?

11 A. Say how?

12 Q. How often have they given you money?

13 A. I don't understand what you mean by how.

14 Q. How many times have they given you money
15 since December 22nd?

16 A. I only received that money once.

17 Q. Did you know there was a receipt for the
18 money that someone had signed for you?

19 A. When somebody signed money that day I went
20 out to buy something, when I came back somebody bring
21 that money and gone, and they gave me my own.

22 Q. They gave you 318,000 Ceefa?

23 A. Yes, they give me money.

24 Q. Did they give you money on any other time?

25 A. That time, we are not hungry, if we need food

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