

## Lessons from Sierra Leone for Transitional Justice in Muslim-Majority Countries

By Stephen J. Rapp and Mohamed A. Bangura  
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### 1. The Need for Hybrid Justice

Sierra Leone can be seen as a country that did transitional justice ‘right’ following its brutal 11-year civil war. It was then able to emerge as a democracy with competitive elections. It held courtroom trials convicting major perpetrators from both sides and conducted truth-commission hearings that told a more complete story. Central to its success was the hybrid Special Court for Sierra Leone (‘SCSL’). Its success has encouraged other countries to consider the hybrid model, particularly in sub-Saharan Africa. Similar courts have been established, or are under construction or active contemplation, in the Central African Republic, the Gambia, South Sudan, Liberia, and the Democratic Republic of the Congo. Victims often favour hybrid mechanisms that reflect local traditions while avoiding weak or politically-influenced domestic courts. They are also interested in processes that are not purely judicial, as seen in the national truth commissions in Liberia and the Gambia for full historical accounting. Only Sierra Leone, however, implemented both a truth commission and a hybrid court simultaneously immediately after conflict’s end.

By contrast, in the Muslim-majority countries of North Africa, the Middle East, and Central and East Asia, mass atrocities have rarely been followed by accountability. Exceptions include special courts in Iraq and Bangladesh, but these were limited to historic crimes and were criticized as being politically controlled by successor regimes. For the crimes committed by government forces in the suppression of the uprisings of the ‘Arab Spring’ or by armed groups in subsequent conflicts, no effective judicial or truth-telling processes have been established. This may reflect the fact that these countries have only rarely accepted international criminal law by ratifying the Statute of the International Criminal Court (‘ICC’), while all but one of the sub-Saharan African countries are ICC state parties. But there appears to be a very similar demand for truth and justice by the victims and survivors of atrocity crimes in all Muslim-majority countries, as well as concern about the processes being dominated by one group at the expense of others. This would suggest that the hybrid approach developed in Sierra Leone could provide useful lessons in developing appropriate processes in these countries.

The Sierra Leone conflict of 1991–2002 grew out of political and economic demands that were not being satisfied by a corrupt government. These demands could have been managed by opening political space and ending corruption, but the government’s resistance to loss of total control allowed an armed rebel group known as the Revolutionary United Front (‘RUF’) to gain support. When its brutal tactics alienated the population, the group responded with horrendous violence in ‘Operation No Living Thing’ and ‘Operation Spare no Soul’. This led to the formation of other armed groups and the active engagement of outside forces. The public’s demands for political and economic change were soon overtaken by those who were solely motivated by a desire to capture and plunder the country’s diamond fields. While the

conflict was never fought along sectarian lines, it did gain an ethnic or regional dimension because of the formation of the Civil Defence Forces (‘CDF’) to fight the RUF and its recruitment from the traditional hunting societies of the ethnicities of southern Sierra Leone. The CDF subsequently committed atrocities against civilians associated with the northern ethnicities that were prominent in the RUF. As a result, true reconciliation between ethnicities and regions required a balanced approach to accountability.

Similarly, the uprisings against dictatorial and corrupt regimes during the Arab Spring sometimes led to civil wars after these regimes met peaceful opposition with brutal repression. This led to the rise of armed extremist groups like the Islamic State of Iraq and Syria (‘ISIS’) that committed horrendous crimes against innocent civilians, sometimes against members of sectarian minorities that were perceived to be regime allies. This allowed the repressive regimes to cast themselves as protectors of religious groups, and to cover and justify ongoing atrocities against everyone opposed to the regimes’ continued rule. Even after the overthrow of repressive regimes, the populations were likely to remain badly divided and to require a balanced approach to accountability in order to restrain acts of vengeance and to prevent the recurrence of conflict.

### 2. The Civil War in Sierra Leone

In Sierra Leone, over the course of nearly 11 years of conflict, a high number of lives were lost and significant damage done to the country’s fragile infrastructure. Economic life came to a standstill as the conflict engulfed every part of the country. Agrarian life, the primary means of subsistence in rural communities, was abandoned. Manpower needed for development was diverted into the war effort. Various estimates put the total loss of life at around 50,000.<sup>1</sup> Three times that number suffered injuries of various kinds, including the crude amputation of limbs that became emblematic of the savagery of the conflict. The list of atrocity crimes is endless – murder, physical violence, rape and sexual violence against women and girls (including a newly characterized crime, forced marriage), pillaging of property (including plunder of natural resources), destruction of property through burning, enslavement and forced labour, recruitment of child soldiers, and attacks on peacekeepers. There were a significant number of combatants on all sides, as shown by the fact that a Disarmament Demobilization and Reintegration programme (‘NCDDR’), established by the United Nations (‘UN’) at the end of the conflict, registered 72,400 ex-combatants.<sup>2</sup>

<sup>1</sup> Gberie Lansana, *A Dirty War in West Africa: The RUF and the Destruction of Sierra Leone*, C. Hurst & Co., London, p. 6; The Sierra Leone Truth and Reconciliation Commission (‘SLTRC’) reported 4,514 killed, basing its figures on testimonies of witnesses that appeared before it only.

<sup>2</sup> See SLTRC, “Appendix 2: Submissions to the TRC”, in *Report of the Sierra Leone Truth & Reconciliation Commission*, October 2004, p. 635 (<https://www.legal-tools.org/doc/2nc59p6/>).

The Sierra Leonean conflict was marked by a complex set of actors and shifting alliances. The key players included the RUF, the rebel group that started the conflict in 1991 with support from Charles Taylor, then leader of the Liberian rebel group known as the National Patriotic Front of Liberia (‘NPFL’). Democratic elections were organized in February 1996 but were opposed by the RUF that began its notorious practice of amputating hands to terrorize the population against casting votes. The new government signed a peace agreement with the RUF in November 1996,<sup>3</sup> but the RUF continued the war. In May 1997, a breakaway faction of the Sierra Leone Army – the Armed Forces Revolutionary Council (‘AFRC’) – overthrew the elected government and invited the RUF to “come out of the bush”<sup>4</sup> and form a government with them to “bring peace”<sup>5</sup> to the country. The alliance, backed by Taylor, was widely condemned and is remembered as the ‘worst government ever’ as it supported itself by exactions against the citizenry.

In response, the CDF, a militia loyal to the ousted government, organized resistance with the support of the Economic Community of West African States Monitoring Group (‘ECOMOG’), a regional intervention force created by West African states led by Nigeria. The CDF and ECOMOG were successful in removing the junta from power and reinstating the elected government in March 1998. The CDF continued to serve as a parallel security force to the government until the end of the conflict. However, as noted earlier, it was alleged that CDF committed atrocities against civilian populations that were perceived to be supportive of the RUF and AFRC. The RUF/AFRC alliance continued, with the cross-border support of Taylor, ever more extreme in its violence as it pillaged the civilian population and brutalized those who resisted in ‘Operation Pay Yourself’.<sup>6</sup>

### 3. Establishment of the Special Court for Sierra Leone

The RUF/AFRC alliance retook Freetown in January 1999, subjecting the residents of the capital to murder, rape and abduction. Though ECOMOG was able to drive the alliance from Freetown, they continued to hold most of the countryside. This forced the reinstated government to negotiate peace under an agreement signed in Lomé in July 1999.<sup>7</sup> The agreement provided for political power-sharing with the head of the brutal RUF, Foday Sankoh, who was given the rank of national vice president with responsibility for the diamond minefields that his RUF has been seeking to pillage. It also provided for the disarmament of the RUF and AFRC, the deployment of UN peacekeeping force across the country, amnesty for all crimes committed before its signing, and the creation of the SLTRC. The agreement was not successful as the RUF refused to disarm, killed and took UN peacekeepers hostage, and shot non-violent demonstrators who marched on Sankoh’s residence in Freetown to protest RUF non-compliance. The war continued, and with the help of a small United Kingdom intervention force, it was eventually possible to defeat the rebels and for peace to be restored in 2002.

The SCSL came into being because of the demand of the people of Sierra Leone for justice. The nation saw accountability for the serious perpetrators as necessary to prevent recurrence of the horrible crimes committed against innocent civilians during the war. Young people were particularly active, forming accountability clubs that campaigned for the creation of a court that would have the capacity to try those most responsible. Religious and traditional leaders, who had seen how agreements that promised peace were broken, supported trials of those

who had betrayed and terrorized their fellow Sierra Leoneans.

Through domestic and international consultations, a consensus developed not to establish an exclusively international court, like the tribunals for ex-Yugoslavia and Rwanda, but one that would represent a partnership of the domestic and international communities through a ‘treaty’ between Sierra Leone and the UN. Though the result was a court where the prosecutor and majority of the judges were international, most staff were national. This mixing was seen as providing great benefit to both groups, as the internationals could learn much more about local context, culture and tradition from the nationals, while the nationals could benefit from the internationals’ experience in building complex cases to hold distant leaders to account.

Creating a court through an international agreement also allowed for the application of international law as it existed at the time of the crimes. This was important because Sierra Leone had not domesticated international crimes and doing so after the fact would create *ex post facto* challenges. The use of international law would avoid the application of the Lomé amnesty to the most serious crimes committed before July 1999. It offered a strong possibility that President Taylor of Liberia – alleged to be responsible for key aid, planning and direction to the RUF – could be charged despite head of state immunity. At the same time, the hybrid model allowed for the application of domestic law, and the statute that emerged included crimes as to which there appeared to be gaps in international law, such as cruelty against children and wanton destruction of property. In another context, this precedent would seem to support the inclusion of provisions of Islamic law consistent with international law or already included in domestic statutes. This could be shown to be reflective of the teachings of the Holy Qur’an, specifically the declaration in *Sūrat al-Ma’idah* (5:32), interpreted as “to kill one innocent is to kill all of humanity”.

The type of crimes covered by the SCSL Statute (war crimes, crimes against humanity and other violations of international humanitarian law) were unfamiliar to the majority of Sierra Leoneans, even to the educated class and many of its legal professionals. However, the underlying offences charged (murder, physical violence, rape, sexual violence, enslavement and forced labour, pillaging, recruitment of child soldiers, and attacks on peacekeepers) were seen as wrongs that they had experienced or witnessed, largely satisfying the people’s desire for justice. That satisfaction, however, remained limited, given the statutory restriction to prosecute “those who bear the greatest responsibility” for the international crimes committed in Sierra Leone only from 30 November 1996 to the end of the conflict in 2002. This resulted in charging only 13 individuals who held leadership positions. Questions are raised to this day about the impunity gap it created – the unaddressed criminal responsibility of numerous junior and middle level perpetrators. Nevertheless, the SCSL success in convicting leaders of a broad range of criminal acts committed across the conflict continues to be hailed inside and outside the country as a major success for justice that has helped preserve peace and security in the years that followed.<sup>8</sup>

### 4. SCSL Achievements

Perhaps the greatest of the SCSL’s achievements is its contribution to the development of international criminal law through its jurisprudence, some of which has been groundbreaking. The list is impressive and its impact significant. The SCSL’s legal footprints are everywhere across contemporary courts and tribunals practicing international criminal law, including the unavailability of head of state immunity as a defence to prosecutions in an internationalized court;<sup>9</sup> the inapplicability of grants of amnesty as a defence against international crimes; the possibility of successfully prosecuting recruitment of children under the age of 15 as active combatants,<sup>10</sup> as well as attacks on peacekeep-

<sup>3</sup> Sierra Leone, Peace Agreement between the Government of the Republic of Sierra Leone and the Revolutionary United Front of Sierra Leone (RUF/SL), 30 November 1996 (<https://www.legal-tools.org/doc/b5c7b5/>).

<sup>4</sup> SCSL, *Prosecutor v. Charles Ghankay Taylor*, Judgment, 18 May 2012, SCSL-03-01-T, para. 3819 (<https://www.legal-tools.org/doc/8075e7/>).

<sup>5</sup> *Ibid.*, paras. 43, 6481, 6749.

<sup>6</sup> SLTRC, “Chapter 3: Women and the Armed Conflict in Sierra Leone”, in *Report of the Sierra Leone Truth & Reconciliation Commission*, Volume Three B, October 2004, p. 184, para. 382 (<https://www.legal-tools.org/doc/6925d6/>).

<sup>7</sup> Sierra Leone, Peace Agreement between the Government of Sierra Leone and the Revolutionary United Front of Sierra Leone, 7 July 1999 (<https://www.legal-tools.org/doc/380791/>).

<sup>8</sup> See generally, Residual Special Court for Sierra Leone (‘RSCSL’), “Legacy Conference Report”, 5 August 2024.

<sup>9</sup> SCSL, *Prosecutor v. Taylor*, Decision on Immunity from Jurisdiction, 31 May 2004, SCSL-03-01-I-059, para. 52 (<https://www.legal-tools.org/doc/3128b2/>). The ICC too has indicted sitting heads of state: Sudan’s Omar Al Bashir, Kenya’s Uhuru Kenyatta and Ivory Coast’s Laurent Gbagbo.

<sup>10</sup> SCSL, *Prosecutor v. Brima, Kamara and Kanu*, Judgment, 22 February

ers, as violations of international humanitarian law; and the possibility of successfully prosecuting brutal conduct not specifically described in a statute, such as forced marriage, as an inhumane act constituting a crime against humanity.<sup>11</sup> The SCSL also showed that it was possible for a criminal court and a commission for truth and reconciliation to work at the same time, through the prosecutorial promise not to use information gained by the TRC in later trials of the perpetrators.<sup>12</sup>

A further SCSL achievement has been the capacity-building that it spurred in several areas within the national system. This included enhancing the professional knowledge and skills of Sierra Leone practitioners, improving adherence to the rule of law, and advancing principles of accountability across the board. The SCSL worked directly with national officials to establish a witness management and protection service, and to improve indigent criminal defence. It also fostered a positive environment for the enactment of progressive laws that promote the rights of women and children and a rights-respecting culture.<sup>13</sup>

The transfer of knowledge and skills from internationals to their local counterparts across all cadres should not be underestimated. By the end of the Court's life, several Sierra Leonean legal professionals had served in chambers, prosecution, defence and the registry, acquiring expertise and experience that were transferred back to the national system in the various capacities that they went on to serve (such as head of the anti-corruption commission, minister of justice, and chief justice). This has enriched the quality of justice delivered in the domestic system both procedurally and substantively. High levels of skill transfer were also seen among returning police investigators and prison officers who had been seconded to the Court, some of whom have since served in the civilian components of UN peace-keeping missions.<sup>14</sup>

The speed with which the SCSL was able to complete its mandate and transition into a residual mechanism has contributed to its success. Compared to other *ad hoc* tribunals – such as those for the ex-Yugoslavia and Rwanda – the SCSL was able to complete its core mandate within a shorter period and at a comparatively lower cost per accused. This goes back to its hybrid character which enabled its location in the country where the crimes were committed, making it easier to collect and preserve evidence and locate witnesses. Local investigators (from the same communities and culture as the victims and perpetrators) were more effective than international staff in evaluating witness credibility, particularly in assessing the trustworthiness of informants and prospective insider witnesses.

Local participation in the Court's work also played a critical role, enhanced by the Outreach Section, a unit outside the Court's core budget. The vibrancy of the outreach programme, characterized by ongoing engagement with the community from the beginning, gave the Court, hitherto viewed with scepticism as a foreign institution, broad visibility, recognition and acceptance. Hundreds of outreach meetings were conducted in all parts of the country, each beginning with Muslim and Christian prayer. Thirteen outreach co-ordinators reported back from the country's regions on what they were hearing, and there was a monthly interactive forum where civil society representatives met with the Court's principals. The trials were open to the public and videos of the proceedings were screened at public meetings so that justice was not only done, but it was also seen to be done.

2008, SCSL-2004-16-A (<https://www.legal-tools.org/doc/4420ef/>); ICC, *Prosecutor v. Dominic Ongwen*, Judgment on the appeal of Mr Ongwen against the decision of Trial Chamber IX of 4 February 2021 entitled "Trial Judgment", 15 December 2022, ICC-02/04-01/15-2022-Red, paras. 1685–1687 (<https://www.legal-tools.org/doc/4420ef/>).

<sup>11</sup> *Ibid.*

<sup>12</sup> Rachel Morley and Nadia Abramson, "Sierra Leone", in *African Transitional Justice Hub*, 4 March 2020.

<sup>13</sup> See, for example, Sierra Leone, The Child Rights Act, 3 September 2007 (<https://www.legal-tools.org/doc/y70f535f/>); The Domestic Violence Act, 26 July 2007 (<https://www.legal-tools.org/doc/2jihkn6/>); The Devolution of Estates Act, 26 July 2007 (<https://www.legal-tools.org/doc/7uzxhi43/>); and The Sexual Offences Act, 9 October 2012 (<https://www.legal-tools.org/doc/bxn00b7k/>).

<sup>14</sup> See RSCSL, "Legacy Projects" (available on its web site).

## 5. The Truth and Reconciliation Commission: An Alternative Route to Achieving Justice

Sierra Leone's success story in achieving peace through justice is not attributable solely to the work of the SCSL. The transitional justice process also included the SLTRC where victims/survivors told their stories confidentially or in public. It published a multi-volume report which drew attention to root causes of the conflict, such as the corruption of the former regime and weakness of the rule of law,<sup>15</sup> and the numbers of violations committed by the various armed groups which suggested the need to prosecute leaders of more than one side in the conflict. The SLTRC's work contributed to narrowing the impunity gap created by the Court's above-mentioned mandate limitation. The work of both the SCSL and the SLTRC are told in a 'Peace Museum' on the grounds of the former SCSL in Freetown, open to the Sierra Leone public and international visitors.<sup>16</sup>

## 6. Challenges

The SCSL had its challenges too, prominently its reliance on voluntary funding, as opposed to the assessed UN funding of the *ad hoc* tribunals for ex-Yugoslavia and Rwanda. The Court had to solicit its own funding from willing states. To this end, a Management Committee was created, consisting of the representatives of states that were supportive of justice in Sierra Leone. The efforts of the Committee needed to be supplemented by the President, Prosecutor and Registrar. This was often a distraction from their core functions of delivering justice. The realization that insufficient funding could cause trials to end before completion, necessitating the release of defendants, caused constant worry for officials and the victims who relied on the Court for protection. Even as trials proceeded, the insufficiency of funds impacted staffing and resources in the offices of the Court. Towards the end of its proceedings though, the SCSL did benefit from partial funding from the UN budget, through annual 'subvention grants'. After the closure of the SCSL and its transition into a residual mechanism (RSCSL), its modest budget has largely been met by these subvention grants.

## 7. Justice in an Islámic Context: A Critical Assessment

To assess the effectiveness of SCSL's work in addressing the post-conflict justice needs of Muslims, it is important to take a step back and examine the country's legal framework and how it delivers justice to Muslims. Sierra Leone's two main religions are Islám and Christianity, the former currently representing 78 per cent of the population. Although in the minority, Christian worship and way of life has held a strong sway. Most of the country's literate population, including the so-called *elites*, are the products of Christian-oriented educational institutions across the country, which gives Christianity greater prominence in public life.<sup>17</sup> In addition, Sierra Leone's pre-independence history included over two centuries of British colonial rule that encouraged the adoption of an Anglo-Saxon lifestyle and culture, and left behind at independence in April 1961 a public life and culture steeped in Christian values, including its legal system.<sup>18</sup> Muslims make up the majority of the up-country population and have been less involved in upper echelons of public life. They mostly adhere to customary laws which vary from community to community (ethnic groups) and sometimes bear some element of Islámic rules or principles. Notwithstanding, in an age of increasing religious polarity and conservatism, Sierra Leone has consistently demonstrated an exemplary co-existence between adherents of the two major religions. This is marked by a high level of tolerance as seen in inter-faith marriages, mixed-faith families, and faith-based educational institutions catering to the needs of all regard-

<sup>15</sup> See SLTRC, "Sierra Leone TRC Reports" (<https://www.legal-tools.org/doc/f5e1e4/>).

<sup>16</sup> RSCSL, see *supra* note 14.

<sup>17</sup> Joe A.D. Alie, *A New History of Sierra Leone*, Macmillan Educational Publishers, Freetown, 2016, pp. 71–78; C. Magbaily Fyle, *The History of Sierra Leone*, Evans Brothers Ltd., London, 2008, pp. 71–76.

<sup>18</sup> Alie, 2016, pp. 169–171, see *supra* note 17; SLTRC, "Chapter 1: Historical Antecedents to the Conflict", in *Report of the Sierra Leone Truth & Reconciliation Commission*, Volume Three A, October 2004, p. 6, para. 11 (<https://www.legal-tools.org/doc/0773ad/>).



less of religious affiliation.

Although not driven by religion, the Sierra Leonean conflict showed signs, at various stages, of the country's deeply embedded religious values. Some practices have their roots in traditional religious beliefs such as the ceremonies of initiation of fighters which promised protection from bullets. Additionally, there was the wearing of distinctive types of traditional dress, including amulets inscribed with verses from the Holy Qur'án, thought to aid the safety and success of fighters.<sup>19</sup> In particular, CDF fighters engaged in these practices. There was also the tradition of offering both Christian and Muslim prayers at public gatherings of supporters, as well as making sacrifices, such as the slaughtering of animals, before the commencement of major military operations.

On the other hand, combatants were known to have acted in the most egregious ways during the war, demonstrating scant regard for religious or moral values of Muslim or Christian faiths. Those who ordered or committed horrendous acts showed that they had either missed or forgotten Islámic teachings about sparing the innocent or Christian ones about loving one's neighbour. Mosques and churches were burned and victims were sometimes commanded to perform sacrilegious acts. Muslim worshippers in a mosque were forced to consume alcohol, imáms were targeted for public humiliation and harsh treatment, and some devout persons threatened with death if they did not deny their faiths.<sup>20</sup> However, the perpetrators did not appear to be motivated by religion in targeting their victims. There was no rhetoric about the enemy being infidels or non-believers, no rationalization of violence like that historically heard from religious extremists, whether from jihádists or crusaders.

The historical development of international norms on the ethics of war recognizes Islám's contribution in shaping the rules of modern warfare. Islámic edicts regarding the conduct of war clearly align with early humanitarian principles throughout the world. As noted earlier, the protection of the innocent is demanded by *Súrat al-Ma'idah* (5:32) of the Holy Qur'án which is fully translated as: "whosoever kills a human being, except (as punishment) for murder or for spreading corruption in the land, it shall be like killing all mankind". This verse finds expression in the universal principles establishing the right to life and by its extension, the international humanitarian law principle that imposes a duty to protect civilian lives and civilian objects in conflict situations. The Qur'án in *Súrat al-An'aam* (6:151) reinforces the sacredness of human life as follows: "do not take a soul which God has forbidden, except through the due process of law".

In short, the body of laws administered by the SCSL, being a mixture of international humanitarian law and, to a limited extent, Sierra Leonean law was applied equally to Muslims and non-Muslims, as victims or as perpetrators. Muslim and non-Muslim victims of the conflict were entitled to justice, and perpetrators, regardless of faith, were subject to punishment after trials that followed strict procedures to protect the innocent. The Islámic edicts on sanctity of human life and

prohibitions against the taking of an innocent life or inflicting other unjustified wrongs against the innocent were reflected in modern international humanitarian law and in domestic laws, as applied at the SCSL.

Measuring the quality of justice delivered from the point of view of punishment presents different considerations, as there is often a lack of synchrony between the punishment expected and that administered. Strict adherence to Islám's harsher principles of punishment for crimes may be less sought today even in traditional societies, but some conservatives continue to push for harsh punishments reflective of those at the time of Islám's founding. In the sentences pronounced by the SCSL – which have embedded in them a goal of rehabilitation – the convicts were given a term of years for unlawful killings, which aligns with modern penal objectives. However, some conservative Muslims would have preferred a penalty of death for such crimes, if this were an available option. It is heartening to note though that extreme forms of punishment such as the death penalty have been rejected under modern human rights law, and by the UN and almost all the states that provided contributions to the success of the SCSL.

## 8. Conclusion

Transitional justice in Sierra Leone benefited greatly from a hybrid special court that respected international law as well as domestic law and traditions. It mixed international and local officials and staff in ways that proved beneficial to both and helped it achieve successes that were not possible elsewhere. The country also benefited from the co-existence of a judicial institution and a truth-seeking commission, allowing more complete accountability than would have been possible by either of them alone. Finally, its historic outreach programme helped the public understand how the law applied by the SCSL answered their demand for justice in ways consistent with their religious traditions. Sierra Leone's approach to transitional justice thus provides useful lessons for other Muslim-majority nations that have experienced similar atrocities.

*Stephen J. Rapp is a Senior Fellow at the United States Holocaust Memorial Museum's Center for Prevention of Genocide and at Oxford University's Center for Law, Ethics and Armed Conflict. He also serves as Chair of the Center for International Justice and Accountability (CIJA). From 2009 to 2015, he was Ambassador-at-Large, heading the Office of Global Criminal Justice in the United States' State Department. Rapp was the Prosecutor of the SCSL from 2007 to 2009 (where he led the prosecution of former Liberian President Charles Taylor), before which he was Chief of Prosecutions at the International Criminal Tribunal for Rwanda. **Mohamed A. Bangura** is Prosecution Legal Adviser and Evidence Officer at the Residual Special Court for Sierra Leone in the Hague. He was previously a Trial Attorney in the SCSL Office of the Prosecutor (2002–2013). He started his legal career in Sierra Leone with Renner-Thomas & Co., where he was an associate partner. The views expressed in this brief are solely his own.*

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<sup>19</sup> Alie, 2016, pp. 40–41, see *supra* note 17; Fyle, 2008, pp. 65–66, 70, see *supra* note 17.

<sup>20</sup> SLTRC, "Chapter 1: Executive Summary", in *Report of the Sierra Leone Truth & Reconciliation Commission*, Volume 2, October 2004, p. 11, para. 31 (<https://www.legal-tools.org/doc/62ff76/>); *id.*, "Appendix 3: Transcripts of TRC Public Hearings", p. 720 (Kambia District, 10 June 2003, Witness Nabie Musa Sesay (civilian victim)) and pp. 1075 ff. (Bonthe District, 10 July 2003, Witness Reverend Father Garrick (civilian victim)) (<https://www.legal-tools.org/doc/pw84zd6r/>).



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