

## ARREST OF CHARLES TAYLOR AND THE PRINCIPLES OF INTERNATIONAL LAW\*

### Abstract

*The Sierra Leone Special Court has indicted Liberia's former President Charles Taylor on eleven counts of crimes against humanity, war crimes, and serious violations of international humanitarian law. In April 2006, Charles Taylor was arrested and brought into the court's custody, and he was tried in 2007. On the 24<sup>th</sup> February, 2022 Russia invaded Ukraine and many souls were lost. This article discusses three issues evolving international law, expected to be highlighted in Taylor's trial. First, Taylor's prosecution contributes to the ongoing challenge to the norm of head-of-state immunity from prosecution for alleged human rights crimes. Second, the prosecution will employ a relatively new tool in international prosecution—personal culpability based on participation in a joint criminal enterprise. Finally, this case will continue the path-breaking work of the Special Court for Sierra Leone in prosecuting individuals for the crime of enlisting children under the age of fifteen years into armed forces and using them in hostilities.*

**Keywords:** Charles Taylor, Arrest, International Law, Sierra Leone Special Court, Liberia

### 1. Introduction

On the 4<sup>th</sup> February, 2022 Russia invaded Ukraine and many souls were lost, it is said that War being consistent has no longer been a prime struggle among international locations with inside the West African Sub- region. Rather what we've taken note of, broadly speaking are Internal Armed Conflicts. Internal Armed Conflicts are regularly, masterminded. By Warlords who grow to be concerned first of all the look for Justice, parity and Fair Play. It is likewise a subculture in Africa for a ruler no matter the crimes they will have taken part in to strike both from their abodes in Exile or a totally faraway part of a country. Rebels regularly with political help have regularly fought their path to power via power sharing peace deals, validating violence as a valid political method, Expediency in those situations comes with an excessive price.<sup>1</sup> This manner of business, a sample of indemnity perpetuates struggle and frustrates the established order of the rule of law, which is so essential to Africa.<sup>2</sup> Indemnity and failure of duty are traits of Africa prison regimes. Chaos in Africa is continually a story of horror particularly because the Warlords in their quest for Justice appoint all method to acquire their purpose. The basics of peace have to be constructed upon bolstered pillars of justice, in addition to monetary and political indicia. Justice is an essential quality or method for peace and balance in the sub-region. There may be no peace if there is no justice in any of its inherent form<sup>3</sup>. Even though the Warlords seek justice, it is also pertinent to mention that the atrocities that. Follow this quest is abhorrent and callous. Justice is not an ethical luxury, sufferers whose lives had been shattered via perpetrated violence deserve the right to look and revel in justice in its genuine shape this is punishment for people who endure obligation for such outrageous conduct. At the end those Internal Conflicts absolutely go out of proportion, because it will become escalated violence resulting to all types of human humiliation. It has to be stated that it is the United Nations Organisation, via its Security Council this is charged with the duty of retaining World Peace and Security and in achievement of that obligation, it ordered peacekeeping missions all around the world and additionally authorized peace enforcement in a few countries. Nigeria and some African Countries have constantly contributed troops to those missions. Therefore, the ECOWAS ECOMOG's intervention in Liberia and Sierra-Leone was in protection of human rights, considering the extent of abuse and degradation that the Warring events inflicted on the civil population.<sup>4</sup> Peace ought to be construed now no longer simply because the absence of War or Conflict among prepared States or among Community inside organized States however additionally as pleasant co-operation and the alliance of peoples in the direction of common goals.<sup>5</sup>

Security is the absence of risk and trepidation of domination, destruction and needs which exist in accordance with peace.<sup>6</sup> It is on the inspiration of peace and confident safety that improvement and prosperity can effectively be established. It is likewise contended<sup>7</sup>, that peace and safety, improvement and prosperity might not be potential through unaided efforts, moves and choices of individual African Countries. It is submitted that responsibility for impunity continues to be a legitimate precept of International Law even if it is turned into dubious whether or not

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<sup>1</sup> JF. Kamara Responsibility for International War Crimes. Peace and Security in the W.A. Sub-region (paper presented at NBA Conf. Abuja Aug. 25, 2004 at P .23)

<sup>2</sup> Ibid

<sup>3</sup> Statement of Chairman Royce- US, of House of Representatives June 2004 JF Kamara: Op cit p. 21.

<sup>4</sup> Lt. Gen S. V. Malu (Rtd) Paper presented at the Abuja Conference of NBA August 22-27 2004

<sup>5</sup> Olusegun Obasanjo "Africa Embattled Published March 1988. p. 41.

<sup>6</sup> Op. cit. p. 41.

<sup>7</sup> Op. cit p. 49.

it was, mainly while Charles Taylor, a former Liberian insurgent who grew to become ruler was granted haven in Nigeria in August, 2003. The eventual arrest and extradition of Charles Taylor from Nigeria in 2006 by security agents to face trial for these War crimes further re-enacts the principle of accountability for impunity as a general principle of International Law.

## **2. The Background of the Theory of International Law**

The prevalence of Internal Conflicts amongst West African States especially in Liberia, Sierra-Leone, was as a result of the inability of the United Nations Security Council to intervene directly in the conflicts in these countries. All they did was to authorize peacekeeping missions all over the World. ECOWAS invoked the UN CHARTER on peacekeeping operation and was able to curtail the obi iteration of Liberia and Liberians by the contending factions. There is an international obligation to maintain peace and security and the accused of such crimes against humanity by creating the International Criminal Court and the International War Crimes Tribunal or Special Courts, one of which is currently sitting in Sierra-Leone. There has been pressure from the International Community for Charles Ghankay Taylor, to be tried by this Special Court in Sierra-Leone for allegedly aiding instability in the region while in office leading to the murder of thousands of people. Despite these pressures for the trial of Charles Taylor, Nigeria granted asylum to this Warlord since 2003. The pressure shifted on Nigeria for the release of Taylor. In November 2005, the United Nations Security Council passed a resolution<sup>8</sup> while the Liberia election was being concluded that the former Warlord be tried at the Special Court. The Security Council unanimously passed a resolution that empowered the United Nations Mission in Liberia<sup>9</sup> to arrest, detain and transfer Taylor to the Court anytime he shows up in Liberia. On the 15<sup>th</sup> December, 2005,<sup>10</sup> the Liberia President - elect Mrs. Ellen Johnson - Sirleaf met with the United States Secretary of State, Condoleezza Rice, where the Taylor's issue was discussed and there was therefore a mounting pressure for his trial. However, before the meeting with the United States Secretary for State, some United States Congress Members wrote to C. Rice demanding that Taylor be brought to justice and that Nigeria be made to release him for trial. The Nigeria Government however insisted that they would not release Charles Taylor unless such request comes directly from a democratically elected government of Liberia<sup>11</sup> Charles Taylor was accused of war crime and indicated in March 2003 by the United Nations Special Court in Sierra-Leone on seventeen counts of war crimes and crimes against humanity for his role in contributing to the deaths, rape, abduction and mutilation of thousands of civilians during Sierra Leone armed conflict.

The real issues which this paper seeks to unravel is whether Charles Taylor ought to be tried for his alleged role in the Sierra Leone Civil War and for his crimes in other West Africa Countries including Liberia and Guinea. Which tribunal and in which country should he be tried? What are the International Law implications of the granting of asylum to Taylor by Nigeria and on the other hand releasing Taylor to the captors and his eventual transfer to Liberia from Nigeria by Security forces? Should Nigeria have released Taylor for trial after granting asylum to him for over three years in Nigeria?

## **3. Brief Overview of Charles Taylor's alleged Mayhem in Liberia and Sierra-Leone**

Charles Taylor related with Nigeria on two levels, as Rebel leader and President of a West Africa Country. On each level Taylor badly hurt our interest.<sup>12</sup> Charles Taylor as a rebel leader of NPFL in Liberia, ordered the death of two Nigeria journalists, the routine execution of our nationals that were forcibly detained in his enclave, ordered the violation of our Embassy in Monrovia by ransacking it and taking Nigerians who were seeking refuge there and our Embassy Staff hostage; held our soldiers who were deployed in his rebel enclave hostages, masterminded the humiliations and death of our soldiers in Tubman burg on December 1995, abused and ridiculed Nigerians their leaders in the International Media, and ordered the killing of Nigerian soldiers who were taken prisoners of War by his rebel NPFL soldiers as a way to teach Nigeria a lesson.<sup>13</sup> As President of Liberia, Charles Taylor also breached the Abuja Agreement which eventually led to crisis that fell him from power, he supported and aided RUF in Sierra-Leone which led to the death of hundreds of our soldiers there and the mutilation and death of Nigerian residents in Sierra-Leone, he virtually chased out ECOMOG from Liberia after all the sacrifices made in both human and material resources by the member countries especially Nigeria.<sup>14</sup> The pertinent question that must be asked at the juncture is why did

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<sup>8</sup> The Guardian Newspaper: Friday January 20, 2006 vol. 22 No 9019 at page 24 .

<sup>9</sup> UNMILZ United Nations Mission in Liberia .

<sup>10</sup> The Guardian Monday December 19, 2005 page 2 vol 22 No. 9888.

<sup>11</sup> The Guardian Newspaper December 19, 2005 page 2 vol. 22 No. 9,888.

<sup>12</sup> Lt. Gen. S. V. Malu (Rtd) Paper presented at NBA Conference Abuja 25. Aug 2004 "Responsibility for International War Crimes Peace and Security in the WA Sub-region p. 7.

<sup>13</sup> Ibid

<sup>14</sup> Ibid

Nigeria grant Asylum to Taylor despite his atrocities against Nigeria; Nigerians and our past leaders? Why did he choose to come to Nigeria instead of going to his Traditional friends Cote D' Ivoire, Burkina Faso, Liberia Taiwan and Ghana? According to a retired Nigeria General<sup>15</sup> who was at the center stage of it all, as ECOMOG commander once wrote my difficulty with the decision of our government to host Taylor is that it portends nothing useful or positive for us instead it has brought all kinds of problems and bad image to us, and our people do not approve it. Nigerians were totally opposed to Taylor coming to Nigeria and there was enough opposition voiced against his presence in the country. The Nigeria Government went ahead despite this opposition and gave him a comfortable cool and serene accommodation and environment in Calabar, Cross River State of Nigeria. By allowing Charles Taylor to stay in Nigeria, our government was condoning, approving or even encouraging impunity if we were serious about human rights violations in whatever form, the government should not have allowed Taylor to come into Nigeria in the guise of peace and security.

#### **4. Charles Taylor's assumed Atrocities in Sierra-Leone**

Charles Taylor alleged atrocious acts in Sierra-Leone are inextricably linked with Foday Sankoh, the Villainous leader of the Revolutionary United Front (RUF) of Sierra-Leone. Sankoh served in Sierra-Leone Armed Forces from about 1956 to 1971 and later worked as a photographer until the mid-eighties. He thereafter lived as a rebel until he died in July 2003<sup>16</sup> Taylor first met with Sankoh in later 1980s in a Military Training Camp in Benghazi, Liberia where they both received military training in revolutionary tactics and guerrilla warfare from the representatives of the Government of Muamar Qaddafi of Libya. Taylor's indictment confirms that when Taylor's NPFL conducted organized armed attacks in Liberia in 1989 against Samuel Doe, Sankoh and his<sup>17</sup> followers were on hand to render assistance. Foday Sankoh's RUF was a mixture of Taylor's NPFL and NPFL trained Sierra-Leoneans and collaborating with other rebel group such as Armed Forced Revolutionary Council (AFRC) headed by John Paul Koroma. RUF started a sustained insurgency against the 'All People Congress' Government of President Joseph Momoh and against the people of Sierra-Leone. This led to Civil Wars fought without regard to the laws of warfare (Jus in Bello).<sup>18</sup> These civil wars inflicted untold hardships and sufferings on combatants alike. The people of Sierra-Leone suffered monumentally from these civil wars that were fought by installments.

Sierra-Leone acceded to the African Charter on Human and People's Rights on the 21<sup>st</sup> September, 1983<sup>19</sup>. The charter enshrines the inviolability of human beings in Article 7 and the right to be free from Torture in Article 5 among other fundamental rights. In sharing 'a common plan, purpose or design (Joint Criminal Enterprise)' with the AFRC, as Taylor's indictment puts it, the RUF engaged in murder, mayhem, and melee. These were systematic attacks against the defenseless civilian population with thousands of them killed, tortured on maimed and displaced. Captured Women and girls were raped, abducted and used as sex slaves and as forced labour. Some of these women were held captive for years. Men and boys were used as forced labour...many abducted boys and girls were given combat training and used in active fighting,<sup>20</sup> the Sierra-Leone civil war was fought mainly to gain and exercise political power in order to control the diamond mining areas of the Country. A 2000 United Nations (UN) report had implicated Charles Taylor in the RUF diamond trade as well as arms trafficking, timber trafficking and other kinds of war profiteering<sup>21</sup> The report recommended a complete embargo on all diamonds from Liberia until Liberia demonstrated that it is no longer involved in the trafficking of arms to or diamonds from Sierra-Leone.<sup>22</sup> Pursuant to the report, the Security Council in March 2001 and by resolution 1343 imposed smart sanctions against Taylor for backing and arming the rebel groups.

#### **5. Should Charles Taylor be Tried? Will his Trial showcase his simplicity and Promote Justice and battle Impunity?**

The flag bearer of legal accountability in the sub-region is the special court for Sierra-Leone. The Court was established by the Agreement between the United Nations and the Government of Sierra-Leone pursuant to Resolution 1315 (2000) of the security council It is mandated to try those who bear the greatest responsibility for

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<sup>15</sup> Ibid, p.8

<sup>16</sup> Nsongurua I. Ubomabana: Charles Taylor. Impunity and International Law being a Seminar Paper delivered at the NBA Conference Abuja on 25/8/2004. P.10.

<sup>17</sup> Ibid, p. 11

<sup>18</sup> Ibid

<sup>19</sup> See African Charter on Human and People's Rights adopted 27 June 1981 entry into force 21 Oct. 1986 Doc. OACICAB/LEG/67/3 Rev. 5. 21. 11.M. 59 (1982).

<sup>20</sup> Sankoh Indictment: paragraph 34. See N.J. Ndombana: Charles Taylor. Impunity and International Law NBA Conf. Aug. 25 2004

<sup>21</sup> See Report of the Panel of Expert appointed Pursuant to Security Council Resolution 1306 (2000) Paragraph 19 in Relation to Sierra-Leone 5/2000/1195. 20 Dec 2000 (hereinafter called Report on Diamond of Sierra Leone).

<sup>22</sup> Paragraph 9 of the Report (Op. cit).

serious violations of International Humanitarian law and Sierra-Leone law committed in the territory of Sierra Leone since 30<sup>th</sup> November, 1996.<sup>23</sup> In a typical case pending at the Special Court, the case of *Issa Sessay and others*<sup>24</sup>, evidence was led how a victim was made to watch while her husband was hacked to death with a cutlass by rebels of the Revolutionary United Force (Run). The witness testified that the rebels took hold of her right hand and with four strokes of a match cut it off. In the same trial, a witness of gender violence testified that at the age of eleven, eight rebels raped her in the physical presence of her parents who were made to watch and cheer. It is pertinent to note that Nigeria played a central role in the formation of the Court. Nigeria sits on the Special Courts Management Committee in New York. Nigeria made the highest donation amongst other African Countries when the court was formed. Nigeria's quest for peace and stability in the sub-region cannot be underestimated.<sup>25</sup> Taylor was indicted by the Special Court in March 2004 for bearing the greatest responsibility for War Crimes committed during Sierra-Leone's Conflict. He was indicted on 7<sup>th</sup> March 2004 specifically on seventeen-count indictment charge and also a violation of Article 3 Common to the Geneva Conventions and of Additional Protocol II and other serious violations of International Humanitarian Law.<sup>26</sup>

### 6. The Charges against Charles Taylor

The offences charged against Taylor are as follows: Acts of terrorism, collective punishment, extermination, murder, violence to life, health and physical or mental wellbeing of persons, rape, sexual slavery and other form of sexual violence, outrages upon personal dignity, violence to life, conscripting and enlisting children under the age of 15 years into Armed Forces or groups, enslavement, pillage, internationally involved in humanitarian assistance or peace keeping mission and for the abductions and holdings as' hostage, taking of hostages.<sup>27</sup> It is alleged by the prosecutor of the Special Court that on 27 February 1991, at the planning conference for the invasion of Sierra-Leone held at Gbanga, Liberia, then serving headquarters to Charles Taylor's National patriotic front of Liberia (NPLF), the late Foday Sankoh then leader of RUF accepted and approved the overall plan and promised' to work with the NPLF training command to ensure professional and tactical military training for his forces. It was at the meeting that Charles Taylor told Sankoh to recruit through involuntary conscription any and all the able bodied men and women, boys and girls within captured areas.<sup>28</sup> It is alleged that he provided financial support, military training, personnel arms and ammunition and other support and encouragement to rebel factions during the armed conflict in Sierra-Leone.<sup>29</sup> That he encouraged rebel forces in campaigns of Terror, torture and mass murder, in order to enrich himself from a share in the diamond mines that were capture by the rebel forces.

### 7. Can Taylor be Tried in the Light of Sovereign Immunity as Head of State?

It is argued that Charles Taylor is immune from any exercise of the jurisdiction of the Special Court by virtue of the fact that he was at the time of the issuing of the indictment and warrant of arrest against him, a serving Head of State. It is the contention of this learned writer<sup>30</sup> that as far as the international court is concerned, International Practice and Academic commentary supports the view that jurisdiction may be exercised over a serving Head of State in respect of International Crimes. Particular reference may be had to the *Pinochet Cases* and *Yerodia case*.<sup>31</sup> It should be noted that the Special Court is not a national court but an International Court established by treaty with a competence and jurisdiction similar to other International Court of Justice. There is nothing in the Special Court Agreement or statute to prevent the court from seeking to exercise jurisdiction over offences committed in the territory of Sierra-Leone by the Head of State of Liberia. The Appeals Chamber of the Special Court found that article 6(2) of the Special Court is not in conflict with any peremptory norm of general international law and its provisions must be given effect. It was held<sup>32</sup> that the official position of the applicant (Charles Taylor) as an incumbent Head of State when Criminal proceedings were initiated against him is not a bar to his prosecution. The Applicant was and is subject to criminal proceedings before the Special Court for Sierra-Leone. It is submitted that Charles Taylor can be tried by the Special Court and the sovereign Immunity does not avail him. Let Taylor be brought to justice now.

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<sup>23</sup> J.F. Kamara Resp. for International War Crimes. Peace and Security in the W.A. Sub-region Paper presented at NBA Conf. Abuja 25 Aug. 2004 at p. 23.

<sup>24</sup> Case No SCSL 2004- 15 pt.

<sup>25</sup> J.F. Kamara Ibid at p.24.

<sup>26</sup> Ibid

<sup>27</sup> J.F.Kamara : Trial Attorney. Special Court For Sierra-Leone Ibid p.25.

<sup>28</sup> J.F. Kamara Ibid p. 25 29.

<sup>29</sup> Ibid at p. 26.

<sup>30</sup> J.F. Kamara: Ibid p. 27

<sup>31</sup> Professor Phillpe Sands: Amicus Curiae Case No. SSCL 2003-01-AR 72 (E1).

<sup>32</sup> Prosecutor Against Charles Gbankey Taylor case No SCSL 2003 01-1.

### 8. The Asylum by Nigeria: Was it necessary and Expedient?

Charles Taylor was forced to resign the Liberia presidency on August 11, 2003, and the Nigerian, president Olusegun Obasanjo granted Taylor asylum the same day and welcome him to Nigeria, where he lived until sometimes in the year 2006 when he was arrested and transferred back to his country to face trial at the Special Court in Free Town Sierra-Leone. There was pressure from both within and outside the Country for Taylor to be bundled out of Nigeria and the reasons for these arguments were that being a Warlord who has committed crimes against humanity it was both moral and legally wrong for Nigeria to grant asylum to Taylor. Foday Sankoh, his partner in crime was on trial in Sierra-Leone by the international court before the watchful eyes of his supporters without any disruption of the transition process in Sierra-Leone. Taylor should not have been granted asylum in Nigeria and nothing would have been caused by his supporters in Liberia. Taylor ought to have been prosecuted long ago. Gradualism might be good for international relations it certainly is not good for international law.<sup>33</sup> If the International Community swallows the tranquilizing pill of gradualism argues a learned scholar<sup>34</sup> it stands the risk of losing potential witness to Taylor's atrocities in Sierra Leone or indeed elsewhere either due to loss of memory or even death. It is submitted that the right time to do justice is in the present as delays defeat justice. The UN Security Council has in its resolutions affirmed the need to bring justice on those who violate international humanitarian and human right law<sup>35</sup> and the UN General Assembly had rejected the use of amnesty laws for serious violations of human rights.<sup>36</sup> The Special Court itself provides that neither amnesty nor a suspect's official capacity is a bar to prosecution in respect of war crimes committed during the Sierra-Leone conflicts.<sup>37</sup> Other international instruments like the Nuremberg principles.<sup>38</sup> The statutes establishing the Yugoslav and Rwandan Tribunals,<sup>39</sup> the Draft Code of crimes against the peace and security of mankind<sup>40</sup> and the Rome Statute of the International Criminal Court (ICC)<sup>41</sup> each of these instruments makes it clear that Head of State Immunity is no longer a defence to prosecution for International Crimes. Nigeria has no legal basis for shielding Taylor from justice argues the learned scholar,<sup>42</sup> since Nigeria is a state party to the former Geneva Conventions,<sup>43</sup> Nigeria has an obligation based on sacred principle of Pacta Sunt Servanda to extradite or prosecute those responsible for War, crimes and crimes against humanity, which the convention treats as grave breaches. Nigeria domesticated the Geneva Convention in 1960 and this allows a state party to prosecute anyone within its jurisdiction even when the person committed the alleged crime outside its jurisdiction.<sup>44</sup> Nigeria is also a state party to the convention against torture and other cruel, inhuman or degrading treatment or punishment<sup>45</sup> Nigeria is also a party to the International Criminal Court Statute<sup>46</sup> ratified by Nigeria on 27<sup>th</sup> September, 2001 and more especially Nigeria is a member of the Management Committee of the Sierra-Leone Special Court. It was Benjamin Ferencz<sup>47</sup> who wrote that 'Human Rights must prevail over human wrongs. International Law must prevail over international crime. Crimes against international law are committed by men not by abstract entities and only by punishing individuals who commit such crimes can the provisions of International Law be enforced'.

In the light of the foregoing, Nigeria ought not to grant asylum to Charles Taylor. This is especially so against the background that Taylor has committed obvious crimes against humanity and at the end of the day international pressure was mounted on Nigeria especially by the United States Government on the compelling needs to release Taylor and transfer him to face his trial. The International Community and National groups in Nigeria did not backslide in their vehement opposition to immunity.

### 9. Conclusion

The fact that Charles Taylor was finally arrested by Nigeria Security Forces and transferred to his country lends credence to the fact that there is a compelling need for the warlord to answer for his misdeeds. It is also a manifestation of the principle of International Law that accountability for impunity remains an avowed principle

<sup>33</sup> (a) *ibid*

<sup>34</sup> NJ. Udombana: Charles Taylor. Impunity and International Law NBA Conf. 34 Aug. 22-27 2004 Seminar paper Delivered at p. 16.

<sup>35</sup> *Ibid* at p. 16

<sup>36</sup> SC/PRST/1998/18 SC/PRST/1999/6/(UN).

<sup>37</sup> GA/RES/44/162, GA/RS/47/133 (UN)

<sup>38</sup> Article 6(1)

<sup>39</sup> of 1950

<sup>40</sup> 1992 and 1994 respectively

<sup>41</sup> 1906 40: 1998

<sup>42</sup> NI. Udombana Op cit p. 17

<sup>43</sup> Geneva Conventions of 1949

<sup>44</sup> Geneva Conventions Act Cap 162 Laws of the Federation of Nigerian (1990) hereinafter Geneva Convention Act.

<sup>45</sup> Convention Against Torture and other cruel, inhuman or degrading treatment of punishment, adopted 10/12/1984.

<sup>46</sup> Rome Statute of the International Criminal Code 17/7/98 UN DocA/Conf/183/9

<sup>47</sup> The Trial of Major War Criminals Proceedings of the International Military Tribunal Sitting Nuremberg, Germany.

of International Law. The asylum granted by Nigeria to Taylor did not serve any useful purpose as the same Taylor tried to escape from Nigeria when it was time to give him up for trial. His escape would have seriously embarrassed Nigeria internationally, as Nigeria's image would have been seen in bad light as aiding or abetting Taylor to escape justice. The man Taylor tried to unlawfully escape from Nigeria but the watchful and eagle eyes of our security agents prevented this monumental embarrassment to our International Image especially at a time when Nigeria President, as President of the Largest Black Nation in the world, was Chairman of the Assembly of the African Union (AU), Chairman of Heads of Government Implementation Committee of the New Partnership for Africa's Development (NEPAD). Nigeria is expected to lead by example and allowing or aiding to abetting or conspiring with Taylor to escape from Nigeria as the world would have seen it would have been quite outrageous and bizarre. Taylor was promptly arrested and transferred to Liberia to face trial for crimes against humanity committed in Sierra-Leone