

Preventing Corruption in Forestry: opportunities and challenges- The Case of Liberia

The Dirty Timber Dozen: A Story of the Liberian Timber
Mafia

By Alfred Lahai Brownell

President and Founder of Green Advocates:www.greenadvocates.org
Monrovia, Liberia

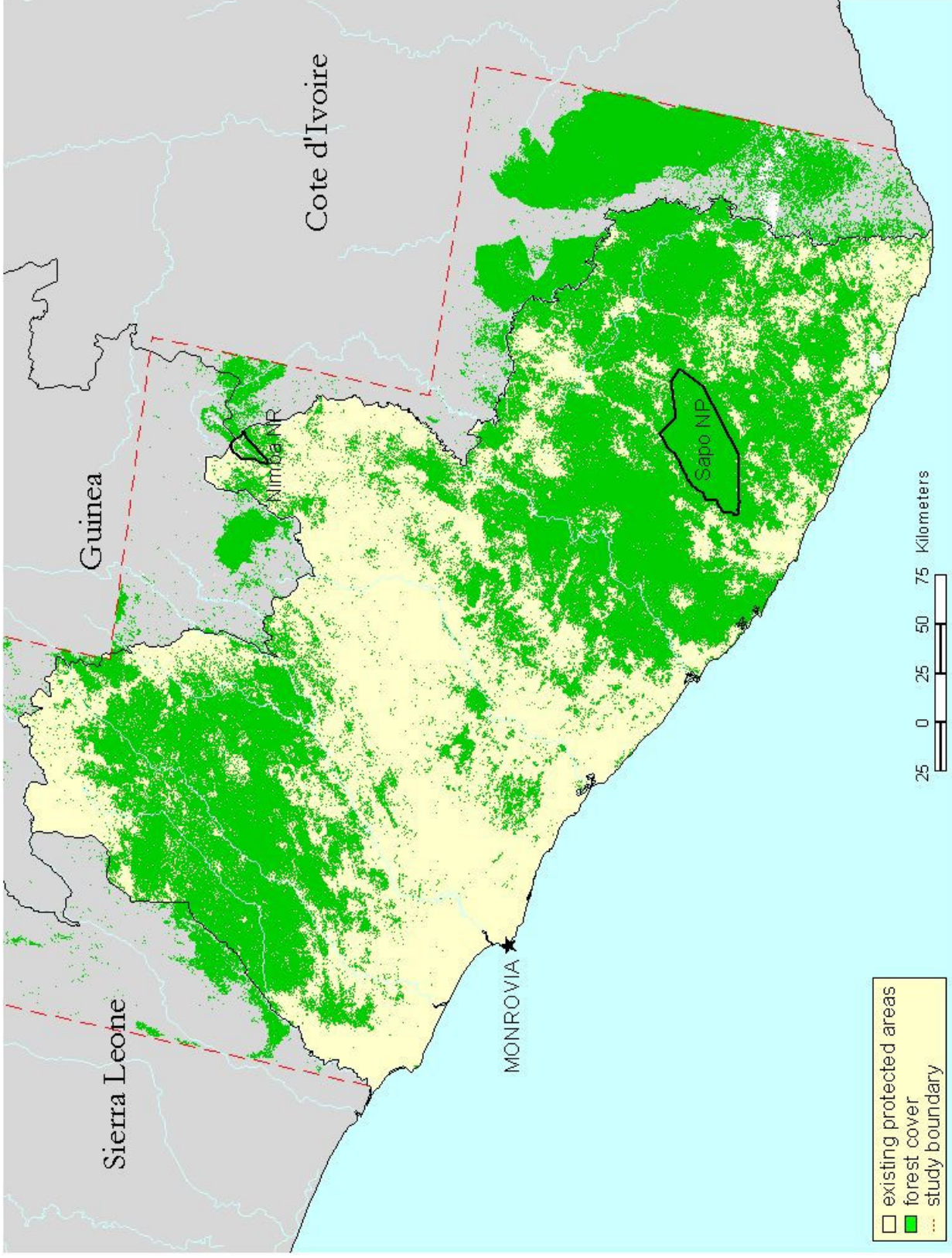
The Timber Dirty Dozen

- One writer says, “When theft (corruption) and thuggery become a way of life, the rule of law gets expelled and collusion between state functionaries and corporations reign supreme.” The timber industry represents just that in Liberia.

The Timber Dirty Dozen is Green Advocates’ contribution to restoring Good Governance in the Liberian Forest sector

Green Advocates Profile

- Green Advocates is a non –profit policy research think tank providing legal aid and support in environmental and human rights research and violations,
- It advocates for the empowerment of poor rural communities to participate in the decision making process as it relates to the management of the natural resources of Liberia,
- It conducts research, draft and lobby for the enactment of appropriate legislation on good governance, transparency and accountability in the natural resources sector and ;
- assist in the strengthening and enforcement of existing human rights and environmental laws.
- Green Advocates was founded in 2000 ,incorporated and accredited by the Liberian Government
- It is Liberia's first public interest environmental and human rights organization working to protect the nation's rural poor and their threatened natural resources, their civil rights through law and environmental advocacy.



Who are the Timber Dirty Dozen

- the “Dirty Dozen” represent the 12 biggest concessionaires that bear the greater responsibility for aiding and abetting armed conflict in Liberia, the Mano River and Cavalla River Basins through the illicit activities (arm smuggling, drugs, money laundering, private militia forces and the financial institutions and individuals which facilitated these criminal transactions

Background: Governance Context

- Historically, commercial forestry started in Liberia in the late 50s to meet the wood needs of concessionaires (rubber and iron ore).
- But “scientific” forestry commenced with the passage of the 1976 Forestry Development Authority (FDA) and the 2000 National Forestry laws.
- the 1976 and 2000 Acts focus mainly on commercial exploitation of the forest by timber concessionaires and give the exclusive right of ownership to Government.
- Rural people, whose survival depends on forest resources, are considered by these laws as squatters; their concerns are not considered in policy consideration .

Background: Governance Context

- This led to a policy of exclusivity in forest management rooted in a patronage natural resources management scheme which only exploit citizens in favor of corporate profits and kickback for state officials.
- Examples: in the mid 1930's The largest private rubber concession (Firestone) hired Associate Justice (William V.S.Tubman who later became president of Liberia for 27 years) as its legal counsel,
- while a mining company(LAMCO), the largest iron ore company, has the luxury of a serving Speaker of the House of Representatives as its legal counsel (Richards Henry).
- President Tolbert, who is credited for being a reformist was not immune. Under his rule, the ruling True Whip Party (TWP), had a 75% share in the Liberia Timber and Plywood Company (LTPC)
- Additionally, in the mid 1970's the Vice President of Cote D'Ivoire, August Dennis owned the Liberian Logging Wood Processing (LLWPC) company. Vice President Dennis asked President Tolbert to oversee his interest in that company.

Background: Governance Context

- President Doe used timber concessions as bargaining chip for the construction of a new defense ministry building and the training of the feared Special Anti Terrorist Unit (SATU) in Israel in the 80s through Yona International an Israeli company through its local face (Liberia timber and Plywood Operating Company).
- SATU was the notorious presidential guard force with a terrible human rights record under the late military dictator Samuel K. Doe.
- Charles Taylor is not only credited for institutionalizing the militarization of the timber industry.
- He ensure that almost every major timber company had private militia forces,
- He also facilitated leading figures in the criminal underworld including the likes of Dutch national Guus Kouwenhoven, the mafia boss of Liberia, the Russian armed trafficker Victor Bout, the Ukrainian mafia strategist Leonid Minin among others. These criminal figures got the largest share of timber concessions and profits.
- The infamous Anti Terrorist Unit's (ATU), Taylor's equivalent of Doe's SATU, training and sustenance was at the expense of timber revenues.
- Concession granting is not therefore about transparency issues, environmental and human rights principles, but protecting vested class and embedded interests and increasing the margin of corporate profits

CORRUPTIONS, BRIBERY, ARMED TRAFFICKING AND MONEY LAUNDERING

- The introduction of military doctrine in the timber industry hardens the grip of political control over the industry,
- It resulted into the siphoning of millions of dollars for personal gains instead of influencing social development.
- For example, in early 1990's , the government of Liberia told Liberians that it accrued US\$80 million from timber sale.
- But independent statistics gathered at various ports of entry in Europe, indicated that the actual amount was US\$200 million

CORRUPTIONS, BRIBERY, ARMED TRAFFICKING AND MONEY LAUNDERING

- The Ministry of Finance said timber production in 2000 was 80,224 cubic meters which generated US\$6.6 million dollars in tax revenue.
- While the Central Bank of Liberia reported on the same period log production to be 934,006 cubic meters which contributed US\$6.7 million dollars.
- These figures lead a staggering 132,000 cubic meter unaccounted for.
- If calculated, one gets US\$100 million dollars;
- the Liberian people were told, however, by one financial authority this amounted to US\$6.6million, another said it amounted to US\$6.7million.

Additionally, the FDA reported that 36,000 cubic meters of logs were exported via the land borders to Cote D'Ivoire during the same period; but no known value in dollar term was

Who is telling the truth?

CORRUPTIONS, BRIBERY, ARMED TRAFFICKING AND MONEY LAUNDERING

- The dirty dozen refer to the 12 timber companies guiltiest of committing cruel environmental and human rights abuses, engaging in tax fraud and money laundering, supporting and maintaining private militia forces, supplying arms to president Taylor in exchange for timber and abetted instability in Liberia and the MRU basin.
- These militia forces were the key actors in proxy wars in neighboring countries and the Liberian conflict.
- They were used as a conduit to supply arms and other warlike materials to the various rebel movements in the sub region including the Revolutionary United Front (RUF) in Sierra Leone, and the MPIGO and MPJ rebel groups in Cote d'Ivoire.
- They also provided guard service to most of the insurgent's leaders and fugitives of justice in the West Africa region,
- The timber militias were the main fighting forces of President Taylor in the civil war and were also used to ruthlessly crush local opposition to excesses of timber companies as well perceived political opponents of the regime.
- The combined forest area exploited by the dirty dozen was more than 85% of the commercially viable forest in Liberia

Private sector (MNC) Case Study 1: The Oriental Timber Company (OTC)

- The Oriental Timber Company (**OTC**), Royal Timber Company (**RTC**), Liberia Forest Development Corporation (**LFDC**), **Natura**, and **TIMCO**.
- These five timber companies were owned by Mr. Guus Van Kouwenhoven, head of the local timber cartel and senior member of President Taylor's inner cabinet
- by 2001, they were logging two-third of the productive forest of the country.
- They operated under a conglomerate called LFDC
- LFDC has the largest forest concession with about 3,074,396 acres.
- Mr. Guus Van kouwenhoven was president /Chief Executive Officer of all five companies.
- Mr. Kouwenhoven is currently serving jail term in his native Holland for arm smuggling associated with the Liberian conflict.

Private sector (MNC) Case Study 1: The Oriental Timber Company (OTC)

- These five companies were connected to private militia operation in various ways. While the OTC and RTC have their own militia forces,
- Natura and TIMCO played the role of mobilizing funds and procurement of arms cash and criminal transfer of financial resources to individuals' bank accounts,
- some of which were believed to be associated with President Taylor and his associates
- NATURA and TIMCO were mainly used to facilitate the procurement of military hardware for regional militia forces involved in proxy wars and facilitating the delivery of illicit natural resources (diamond, gold , and timber) to President Taylor's network of operatives .
- These bogus companies also coordinated illegal transfers of timber revenues into the individual accounts of President Taylor .
- For example, in 2001, Natura transferred US\$1.5 million dollar of timber revenue to a private account associated with the name of President Taylor in the Liberia Bank for Investment and Development (LBDI)

Private sector (MNC) Case Study 1: The Oriental Timber Company (OTC)

- OTC's private militia forces were commanded by General Roland Duo who was Director of the Sea Port Police of Liberia established by Taylor's regime and Chief of Staff of the Navy Division of militia forces loyal to President Taylor.
- The Navy Division was one of the most trusted fighting forces of the President's militia army with a track record of , not only fighting in all the civil wars in the sub region, but credited with using rape as a weapon of war against innocent women and girls.
- The OTC's militia was based at the Port of Buchanan where it had a private prison called "Break Water". Scores of citizens were imprisoned, tortured, killed and raped in this prison .
- This militia was also used to forcefully take other concessions

Private sector (Local Lebanese Cartel) Case Study 2 :**MARYLAND WOOD PROCESSING INDUSTRY (MWPI) AND UNITED LOGGING**

COMPANY (ULC)

- The Maryland Wood Processing Industry and United Logging Company (ULC) are family companies-Shareholders for MWPI include Mr. Abbas -Fawaz, Ali Adala, Ibrahim Ezzedin
- MWPI had 1,129,000 acres in Maryland, Grand Gedeh, Grand Kru, and River Gee.
- ULC however claims to have 515,932 acres of forest concession.
- **These two family companies had militia forces that were integrated directly into the military machinery of Taylor and were pivotal in his regional instability campaign.**
- **For example, General William Sumo, Chief of Star of Government forces in southeast Liberia, was the commander of the MWPI's militia.**

**Private sector (Local Lebanese Cartel) Case Study 2 :MARYLAND
WOOD PROCESSING INDUSTRY (MWPI) AND UNITED LOGGING
COMPANY (ULC)**

- The force was based at the Port of Harper, the third largest port of Liberia.
- This port was given to MWPI by President Taylor to manage as a way to conceal the violation of the armed embargo on Liberia.
- Harper Port was crucial in effectuating the violations of the United Nations armed embargo on Liberia.
- Externally, MWPI's militia played a pivotal role in the destabilization of Cote d'Ivoire by planning and executing the invasion of that country from bases inside Liberia controlled by MWPI and government of Liberia militia forces.
- Our investigation establishes that MPIGO and MPJ rebel forces were trained in the Forest of River Gee County in addition to the Gbartala Base in Bong County.
- Internally, the militia was used to suppress and eliminate opposition to company activities and opponents of Taylor's regime in the southeast.
- In the process, horrendous human rights abuses took place.
- For example, General William Sumo is being held responsible for the massacre of 1,000 indigenous people in River Gee County in 2003.

Private sector (Local Liberian barons) Case Study 3:

INLAND LOGGING COMPANY

- The Inland Logging Company is owned and operated by Maurice and Oscar Cooper, two close associates of President Taylor.
- Inland Logging Company has a private militia force known as “Yellow Jacket”. Yellow Jacket was commanded by General Zogai Massaquoi with the French speaking mercenary (from Burkina Faso), General Israel, as deputy commander.
- The two were members of the Special Forces Commando of the defunct rebel group National Patriotic Front of Liberia (NPFL) of former President Charles Taylor.
- Mr. Oscar Cooper aka Captain Marble, was the C-I-C of the yellow Jacket. Gen. Israel, the French speaking mercenary, was chief security of the Port of Greenville, which Inland Logging Company was running.
- The Port of Greenville is 300 miles southeast of Monrovia and the smallest of the four seaports in Liberia. It has always been one of the principal outlets for the exportation of round logs, rubber and other agriculture produce prior to the civil war.
- It was turned over to Oscar and Maurice Cooper by President Taylor. Captain Marble and Maurice were two of the trusted lieutenants of President Taylor.
- All of the senior security officers assigned to this port were French speaking ex-mercenaries of the defunct NPFL and were mostly Burnable Nationals

Friendly letters

- One may think that members of the timber cartel/mafia were united since they have one aim: the exploitation of timber resources for profit.
- But that was not the case, as reflected in the cross fire involving former Deputy Defense Minister for Operation, General Austin Clarke, President/CEO of Midland Enterprise/logging Company and Mr. Jamil Rizk, Production manager of MGC:

General Clarke wrote this communication to Mr. Rizk on October
15,2003

- We have in our possession documentary evidence
- where Mohammed Group of Companies has committed
- fraud against the Liberian Government and people by under-
- stating the volume of several shipments of logs,
- thereby avoid paying the actual revenues
- required. My friend, do you want to talk about a
- sleeping dog? Just try us, every document in our
- possession from Ministry of Finance, Ministry of
- National Security and Custom will be display to the
- Newspapers in this city. Heaven help you! The days
- Where MGC stole from the Liberian people because
- of her high up connection and supply of arms and
- ammunitions that killed of our people are over.

On the 22 of October, 2003, Mr. Jamil Rizk, replied in kind:

We again challenge you to support your allegation...Mr. Clarke. You were head of the operational wing of government whose speciality was to chase out true human and civil rights advocates out of Liberia. If MGC ever purchased a single arm or ammunition, we challenge you to prove it since you were in charge of every arm and ammunition that killed the Liberian people

Characteristics of the private sector

- Tax frauds,
- Money laundering
- abuses of human rights,
- environmental violations,
- aiding and abetting armed conflicts in the region,
- trafficking arms for timber
- Militarization (private militia)
- Political patronage
- State Failure and collapse
- Natural resources plunder
- Logs of war, conflict timber, blood diamonds
- Predatory adventurism in neighboring countries

Changing course: The role of civil society

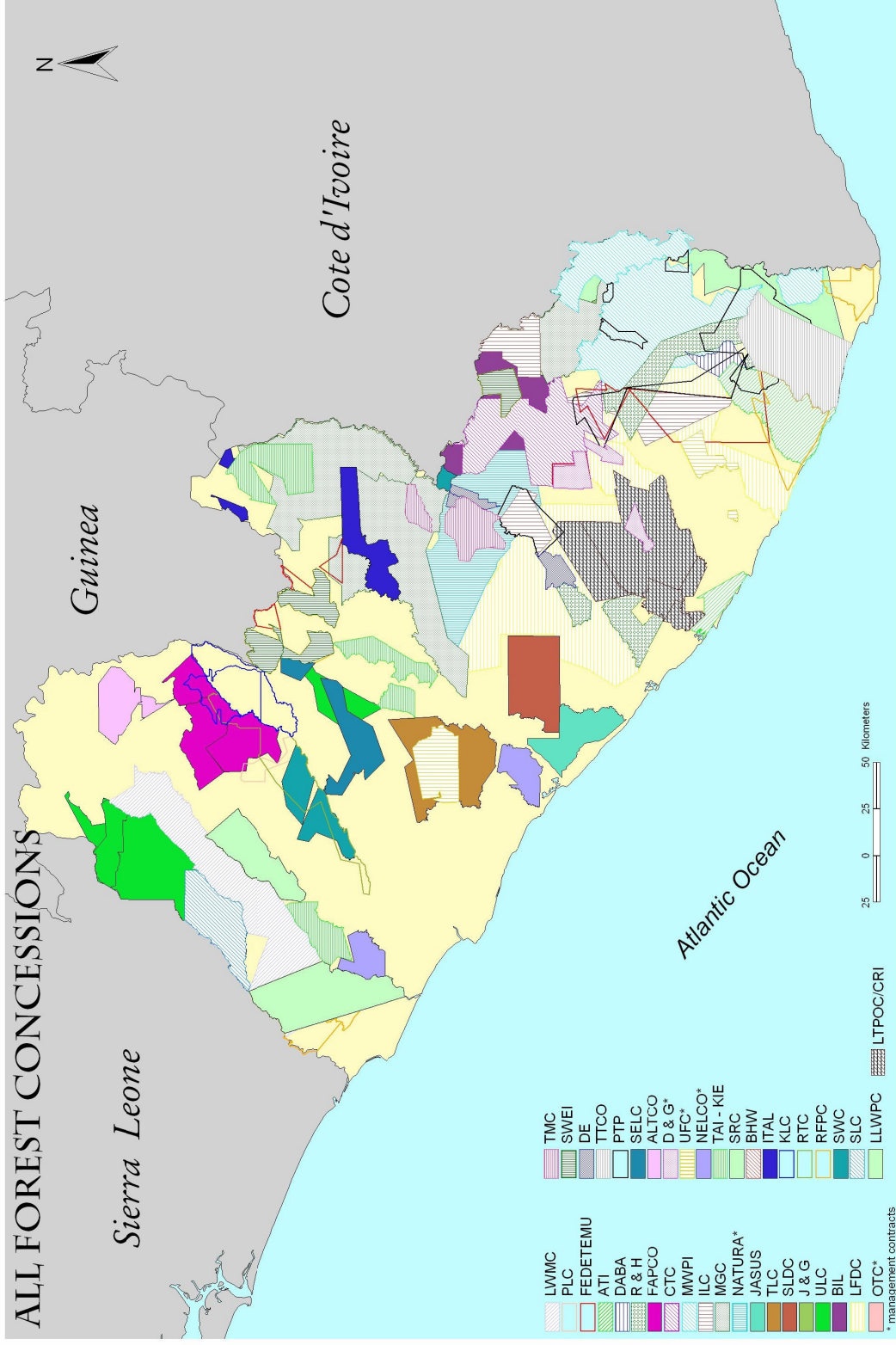
- Documented the illicit activities in the forest sector
- Empirically established a correlation between the illicit activities and instability in West Africa
- Campaigned for Reform of the sector,
- Collaborated with a multi-stakeholder process to champion the reform
- Campaign and succeeded in obtaining UN Sanction to drive the reform
- Pressured the Government of Liberia to set up a commission to investigate and review the contracts and operations of all timber companies-a 17 member commission set up
- Participated in the investigation and review and provided valuable information to the review commission

The Review process: evaluation criteria

- A. Verify if concession holder is a bona fide legal business entity authorized to operate in Liberia;
- B. Verify authenticity of the concession contract;
- C. Examine if the concessionaire acquired other concession's);
- D. Examine UN Security Council Resolution violations (Arms trade, timber for arms, or aiding and abetting civil instability);
- E. Review concession contract for compliance with rule of law;
- F. Examine concessionaire compliance with community obligations under the concession contract (mainly accounting evidence of compliance with education and health obligations);
- G. Examine concessionaire compliance with financial obligations;
- H. Examine concessionaire compliance with applicable labor laws (mainly payroll as per accounting books).

Conclusion of the forest Concession Review Commission

- To fulfill its mandate to review the status of existing forest concessions, the Forest Concession Review Committee
- conducted an extensive and transparent data collection, review, and verification process that included opportunity for public comment and a financial accounting.
- Based on legally principled and technically grounded methodology and decision criteria it developed,
- the Committee found in its case-by-case review that no concession holder demonstrated legal compliance.
- Therefore, the Committee recommends that each and every existing forest concession be cancelled.
- The concession review also revealed widespread non-compliance and pervasive mismanagement in the forest sector, as exemplified by the over 64 million dollars in tax arrears accumulated by concession holders and
- the fact that the combined land area allocated for forest concessions over the last twenty-five years was two and a half times the forested surface area of the entire country. 10 million hectares but 26 million hectares was granted
- Consequently, the Committee has made a series of broader reform recommendations, including appointment of a monitoring committee to oversee their development and implementation.



Recommendations of the Commission

- 1. Act immediately to cancel all existing forest concessions.
- 2. Suspend the grant and allocation of future concessions until the measures for forest management reform outlined in Point #4, below, are implemented and the necessary legislation enacted and regulations passed under Point # 5, below.
- 3. Establish a committee led by the FDA with the participation and assistance of the Liberia Forest Initiative, composed of Liberian and international representatives including civil society, to monitor forest management reform.
- Charge the reform monitoring committee with overseeing the development and implementation of the measures prescribed as a condition precedent to the resumption of concession grants and allocations per Point #2, above. These measures are designed to allow the resumption of timber harvesting in Liberia consistent with international standards and basic principles of accountability, transparency, and sustainability. The measures shall consist of completion of all of the following actions by the FDA and other appropriate agencies:
 - a. Identify appropriate land areas for establishing a concession system using land use planning methods; and
 - b. Establish an appropriate chain of custody system that tracks logging operations from the point of enumeration to export; and
 - c. Work with the international community to define an appropriate tax system (based on percentages of international timber prices) and equitable sharing of the benefits with local communities and institute that system; and

Recommendations of the Commission

- d. Revise the concession contract to reflect legal requirements and mandated procedures, including without limitation the changes in laws, regulations, chain of custody requirements, and taxation procedures prescribed by these measures or otherwise necessary for forest management reform; and
- e. Develop and implement a transparent forest concession allocation system based on bidding, on community consultation and prior informed consent, and on a comprehensive debarment and suspension system that would include a debarment list of those who aided and abetted civil disturbances and a suspension list of those who defaulted on their financial obligations; and
- Establish procedures for investigating, crafting appropriate remedies, and taking legal action for financial and tax fraud, human rights abuses, economic sabotage, and violations of labor and other laws attendant upon misuse and mismanagement of the forest resources of Liberia; and
- g. Elaborate an Environmental Impact Assessment and sustainable forest management planning process and implement them for future concession allocations; and
- h. Evaluate possible options and criteria for the FDA's entering into a management contract; and
- i. Take measures to institutionalize the participation of communities and civil society in forest management in a transparent manner, including without limitation access to information, mandated public participation, and the right to bring citizens' suits against both public and private parties to redress violations of law; and
- j. Conduct a comprehensive review of the forestry laws and regulations to identify on a priority basis what strengthening amendments and additions are needed to implement forest management reforms.
- Propose legislation and pass regulations based on the review conducted under Point #4. j., above.
- Issue an Executive Order(s) forthwith that adopts and executes these recommendations of the Forest Concession Review Committee in their entirety.
- The Forest Concession Review Committee further recommends that the National Legislature of Liberia
- 7. Endorse and affirm the contents and requirements of the Executive Order(s) issued under Point #6, above.
- 8. Enact legislation based on the review conducted under Point # 4. j., above.
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To date

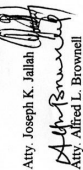
- A Multi Stakeholder Forest Reform Monitoring Committee has been established consistent with the Mandate of the Review Commission
- Executive Order Issued canceling all non compliant timber concessions in Liberia
- A reform Forestry law incorporating some of the recommendations of the Review Commission has been enacted into law democratizing the management of the forest sector.
- A set of regulations to implement the new law is presently being formulated
- A detailed manual of procedures and operation for the forest agency is also being designed
- An audit of the forest Agency has been completed
- An international Fiscal/financial comptroller has been appointed at the forest Agency
- Others.....

This was a piece of cake right? No! We had to use the law

iii. All monthly bank statements, signature cards, bank files, and supporting transactional documents, as requested, for all FDA Concessionaire, as listed in the attachment.

iv. And grant unto Petitioners any and further relief you deem just, fair and equitable in the premises.

Respectfully Submitted
The Above Name Petitioners
By and thru the Ministry of Justice

Atty. Joseph K. Jallah

Atty. Alfred L. Brownell
All Counsels for Petitioners

Dated this 21st day of May 2005

Court Order

REPUBLIC OF LIBERIA } IN THE MONROVIA CITY COURT, TEMPLE OF
MONTSERADO COUNTY } JUSTICE BUILDING, MONROVIA, LIBERIA

BEFORE HIS HONOUR:.....JOSEPH S. BAYAH, STIPENDIARY MAGISTRATE

REPUBLIC OF LIBERIA, TO:
CAPTAIN FORIE V. KAMARA,
MAGISTRATE POLICE OR TO
HIS DEPUTY ASSISTANTS:

#158296

WIT OF SEARCH WARRANT

YOU ARE HEREBY COMMANDED to search from 6:00 A.M. to 6:00 P.M. the premises of the Liberian Bank for Development and Investment, Eco-Bank Liberia Limited, International Bank, Trading and Development Company (TRADEVCO) and all financial institutions that may have in their possession and control documents and records which are directly or indirectly related to or linked to the verification of the Government of Liberia's interest in the use of these companies' permits with the public in Liberia by said institutions or other articles assigned or intended for use or which are or have been used as a means of committing a criminal offense. The said financial institutions are to be searched for the purpose of finding threat the following:

1. Loan Files
2. Information on other Account
3. Bank Statements for the FDA Concessionaires, including the following:

(a) All monthly bank statements, signatures cards, bank files, and supporting transactional documents, to wit:

- i. Ecobank account No. 1221-0000-642018 ✓
- ii. Ecobank account No. 10410017212018 ✓
- iii. LIBV Account No. 0020132851-01 ✓
- iv. International Bank account No. 04-00-00553-4 ✓

10410024912018 (Amplitude)
Dr. M. C. C.
The Clerk

v. For all banks, the account and all information for

Global Trade and Associates, account No. 00368196199 ✓
Shanghai Penalti Sporting Healthcare, account No. 001-0974-055 ✓

vii. For all banks, the account and all information for

Dunraven Holdings, account No. 85186799 ✓

viii. For all banks, the account and all information for

the account No. iii-000043 ✓

ix. For the banks, the account and all information for

the account No. ii-000043 ✓

x. All monthly bank statements, signature cards, bank

files, and supporting transactional documents, as

requested for all FDA Concessionaire, as listed in

the attachment.

THE FOREGOING includes all other financial institutions

associated with timber companies listed in exhibit "B".

cont.../2


Court Order

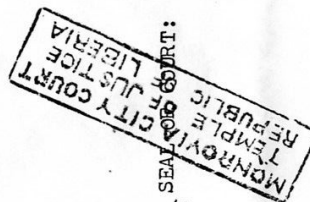
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YOU ARE HEREBY FURTHER COMMANDED that upon the discovery of the aforesaid documentations and informations, you are to bring the same before this Honourable court in keeping with law.

YOU ARE FURTHER HERBY COMMANDED to make your official returns endorsed at the back of this writ as to the forms manner of service thereof. And roe so doing, this shall constitute your legal and sufficient authority.

GIVEN UNDER OUR HANDS AND SEAL OF COURT, THIS 5TH DAY OF MAY, A. D. 2005


Francis Weah
CLERK OF COURT



Personal Threat and danger

• **FOREST CONCESSION REVIEW COMMITTEE – PHASE III**

• Cllr. Fredrick Cherue, Chairman

• Broad and Johnson Streets

• Monrovia, Liberia

• TEL: 06-541816

• June 3, 2005

• His Excellency Charles Gyude Bryant,

• Chairman

• National Transitional Government of Liberia

• **IN RE:** Report of Unlawful Obstruction

• Of the Work of the Forest Concession Review Committee

• Your Excellency Chairman Bryant,

• While reporting relative cooperation from most of the government agencies as well as private corporations and individuals, I wish to bring to the attention of the National Transitional Government of Liberia that the Forest Concession Review Committee and its Technical Secretariat encountered unlawful obstruction while trying to fulfill its mandate.

• To complete its mandated financial review of forest concessions, the Monrovia City Court upon application of the Ministry of Justice issued a Writ of Search and Seizure to the private banks in Monrovia on May 5th, 2005. While in the process of serving the Writ and in the presence of several members of the Technical Secretariat, the UNCIWPOL representative to the Committee, as well as several employees of Eco-Bank, Atty. Alfred L. Brownell of the Technical Secretariat was threatened, insulted, defamed, humiliated and assaulted by the retained Legal Counsel to Eco-Bank Liberia, Cllr. James A. Pierre Jr. The same Cllr. James A. Pierre Jr. also insulted the Sheriff serving the Writ through numerous accusations and slanders.

• The obstruction occurred as Atty. Alfred L. Brownell was superintending the service of Writ on Eco-Bank in order to search and seize instruments that may have been used by some timber companies for the possible evasion of legitimate Government of Liberia taxes, the smuggling of arms, or the violation of United Nation Security Council sanctions imposed on Liberia.

• On two separate occasions, Cllr. Pierre obstructed the service and execution of the Writ claiming the courts had no jurisdiction over Eco-Bank. He instructed an official to sign for the Writ but obstructed all attempts to execute it on May 5th, 2005, when the Writ was served. The accounting team left without gaining access to the records as authorized by the Writ.

Personal Threat and danger

- On May 6th, 2005 the Central Bank issued a letter to each bank requesting compliance with the Writ. In spite of this letter informing Eco-Bank to honor the court's Writ, Cllr. Pierre again obstructed the execution of the Writ, lambasted and rained insults at the sheriffs and then verbally attacked Atty. Alfred L. Brownell spewing out more insults, threats, and assaults. He also ordered the sheriffs outside the room stating they had no business there.
- When Atty. Alfred L. Brownell, attempted to leave the premises of the Bank on advice of some of his colleagues, Cllr. Pierre stalked him out to Randall Streets, again issuing more insults, threats, and assaults.
- Throughout this humiliating and shameful episode witnessed by both Liberian and international representatives on the Forest Concession review committee, including a representative of the United States Government, Atty. Alfred L. Brownell in the line of his official duty and responsibilities, kept his calm and did not utter a single word in return. He boarded his vehicle and departed the vicinity of the Eco-Bank.
- The Committee wishes to inform the National Transitional Government of Liberia that The Pierre and Tweh Law firm for which Cllr. James A. Pierre Jr. is the senior managing partner, is not only on record as being the retained counsel for Eco-Bank, but also has made several representations to the Forestry Concession Review Committee as the legal counsel for several of the very timber companies whose accounts were the subject of the Search and Seizure Writ—including the Oriental Timber Company (OTC), the Liberian Forestry Development Corporation (LFDC) and the Royal Timber Corporation (RTC), among others. If this is not an ethical transgression of the code of conduct for Liberian lawyers, it clearly presents a material conflict of interest under general principles of law recognized by civilized countries.
- The committee wishes to emphasize that this is a matter of grave concern and danger which has serious consequences and implications for perpetuating the culture of impunity and undermining the restoration the rule of law in Liberia.
- The Committee therefore recommends:
 - That the NTGL officially write Atty. Alfred L. Brownell consoling him and offering an official apology for this agonizing emotional distress and discomfort he suffered, especially within public view on the streets of Monrovia to the extent that he had to subdue his feelings and emotions in the national interest for the greater good of accomplishing the work of the Committee.
 - That the NTGL through the Ministry of Justice institute the appropriate criminal proceedings against Cllr. Pierre and Eco-Bank for obstructing the execution of the writ.
 - That the NTGL through the Ministry of Justice transmit an official complaint to the ethics committee of the Liberian bar to institute the appropriate ethical remedies against Cllr. Pierre for his ethical transgressions and conflicts of interest, as well as for insulting and assaulting a colleague lawyer in the execution of official duties.
 - That the NTGL through the Ministry of Justice prevail on the Monrovia City Court to bring contempt charges against Cllr. James A. Pierre and the management of Eco-Bank for obstructing the service and execution of the Writ, as well as for the insult and humiliation suffered by the two sheriffs serving the writ as the result of the actions of Cllr. Pierre and for the refusal of the Eco-Bank to honor the court Writ, respectively.
- Respectfully yours,
- Cllr. Fredrick Cherue,
- Chairman
- Forest Concession Review Committee

Others Actors: embedded networks

- Banks (Local and international)
- Insurance companies
- Investors
- Buyers
- Law Firms
- Accounting firms
- Countries of import(China, Malaysia, France, etc...)
- Judges/Courts
- Lined Administrative Agencies finance, commerce, ports authorities, etc..)
- Local administrators and Local elites
- Law makers
- Ministers
- Generals
- Under world characters(drugs, arms, money laundering, etc..)

Lessons Learned

- **Ground the review on a well-elaborated and consistently applied methodology**
- **Structure the review process to mirror and reinforce its fundamental goal of restoring the rule of law.**
- **Conduct democratized outreach to energize civil society and build informed constituencies of support**
- **Use the review process to create an historical record and provide definitive documentation of illegality and mismanagement.**
- **Put a ‘squeeze play’ on the national government through coordinated international and domestic pressure for reform.**
- **Link the concession review to legal and institutional reform.**

- The structure and methodology of the forest concession review has already been used as the model for the review of other natural resource concessions in Liberia – and could be used as a precedent for other transitioning countries evolving from conflict situations associated with natural resources plunder.
- The mimesis of the rule of law incorporated in the review has helped to demonstrate the kinds of legal and administrative requirements and transparent procedures increasingly demanded by advocates in Liberia and other countries as necessary to secure a law-based society.
- Ultimately, the dynamics of the review – which involved the UN (timber sanctions), the multilateral Liberia Forest Initiative, and Liberian civil society, all working in cooperation with the Liberian government and offering a coordinated bundle of positive and negative incentives – provide a model of internationalized action adaptable to the reform of other sectors and the elimination of sources of conflict