

**IN THE UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF PENNSYLVANIA**

JANE W, in her individual capacity, and in her capacity as the personal representative of the estates of her relatives, James W, Julie W and Jen W;

JOHN X, in his individual capacity, and in his capacity as the personal representative of the estates of his relatives, Jane X, Julie X, James X and Joseph X;

JOHN Y, in his individual capacity;

AND JOHN Z, in his individual capacity,

Plaintiffs,

v.

MOSES W. THOMAS,

Defendant.

Case No. 2:18-CV-00569-PBT

**DECLARATION OF ANDREW VOROS IN SUPPORT OF PLAINTIFFS'
JANE W, JOHN X, JOHN Y, AND JOHN Z
MOTION FOR SUMMARY JUDGMENT**

I, Andrew Voros, declare under 28 U.S.C. § 1746 as follows:

I. Personal Background

1. I am a U.S. citizen and currently reside in New Jersey.
2. By profession, I am a conservationist with a focus on developing photocatalytic solutions for preventive conservation. Presently I serve as Chief Executive Officer of Preventive Conservation, LLC and a partner at Lumiere Solutions.
3. I spent seven years living in Liberia, from 1983 to 1990. I first moved to Liberia in 1983 as a Peace Corps volunteer in Lofa County, northern Liberia. After teaching high-school biology for one year, I worked with the Liberian Forestry Development Authority in Monrovia, Liberia from 1984 to 1985. I was then awarded a grant from the World Wildlife Fund and worked with the Liberian Broadcasting System in 1985 to film a documentary about Liberian rainforests. Although we filmed throughout Liberia, my home base during this time was Monrovia. For the next three years, I also worked at the behest of the International Union for Conservation of Nature, also in Monrovia.
4. For several years, I hosted a weekly radio program called “Wildlife Liberia.” I also worked periodically as a part-time contractor for the U.S. government. For instance, in 1985, I was hired to draft the U.S. Department of State’s country report on Liberia, covering aspects of the country’s history, geography, and culture for Foreign Service officers.
5. In December 1989, when the first civil war broke out, I was working in Harper, Liberia, in southern Liberia by the border with Cote d’Ivoire, researching and filming a documentary for Cuttington University College. I returned to Monrovia, Liberia in June 1990.
6. In this Declaration, I testify about my experience living in Monrovia in the summer of 1990, including assisting survivors in the immediate aftermath of the Armed Forces of Liberia (“AFL”) attack on the St. Peter’s Lutheran Church (the “**Lutheran Church**”).

Massacre”) and personally being arrested and detained by the AFL at President Doe’s Executive Mansion Compound.

II. Civil War Background

7. When I returned to Monrovia in June 1990, I was under the impression, based on the Liberian Broadcasting System’s reporting that the insurrection had been defeated, that the civil war was over. I soon learned firsthand, however, that the war was still in full force. On my return flight to Monrovia, our plane was shot at. When we landed at Spriggs Payne Airport, I saw Liberian soldiers unloading dozens of body bags of fellow soldiers onto the tarmac. I went straight to Sinkor neighborhood to my friend’s apartment in a guest apartment compound of the United States Agency for International Development (“**USAID**”). The compound had four units—two upstairs and two on the ground floor—and a wall around the compound. My friend, an employee of the U.S. OMEGA Navigation Station, was evacuated shortly after with his family, as all American officials were.

8. Despite the situation that I encountered on my arrival, I was hopeful that the conflict would end within a matter of days or weeks. I was able to receive information on key developments in the war thanks to a U.S. Embassy radio and scanner in my friend’s apartment. In the evenings, I would often hear conversations between and updates from the U.S. Embassy political officer and other individuals in Monrovia, who had been provided Embassy radios, such as American missionaries and the USAID compound caretaker.

9. By listening to the radio traffic, I learned that rebel forces had taken Paynesville, cutting Cape Mesurado (also known as Cape Montserrado), the peninsula that made up Monrovia, off from the mainland. I also learned that rebel forces had crossed the mangrove swamp and occupied the other end of the peninsula known as Mamba Point, where the U.S. Embassy was located. Thus, while the AFL still controlled central Monrovia, where the

Executive Mansion and USAID guest compound I lived in were located, the AFL was surrounded on all sides and running low on supplies. It was a pressure cooker, with AFL soldiers killing people every night and even killing dogs to eat, just to survive.

10. For the entire seven years I lived in Liberia, it was under *de facto* military rule. One did not travel any distance without being stopped, questioned, and sometimes even detained by armed AFL soldiers, who were generally recruited from the lowest ranks of society. Under President Doe, the AFL became comprised increasingly of the Krahn tribe—President Doe’s ethnic group—despite the reality that the Krahn comprise a very small minority of the tribal composition in Liberia. In fact, by 1985, it was estimated that at least 80 percent of the AFL was Krahn. By the summer of 1990, the AFL was comprised almost entirely of Krahns who were loyal to President Doe and willing to carry out his commands using brute tactics, including summary executions.

11. In the early months of the war, the AFL soldiers had spent months massacring civilians and purported “rebels,” *i.e.*, Gios and Manos in Nimba County.

12. When I returned to Monrovia, I learned from Gio acquaintances, who worked as security guards at the U.S. Embassy, that if somebody was speaking the language of the Gios, the AFL would target and kill them. When word spread that I was staying at the USAID guest compound, several Gio internally displaced persons (“**IDPs**”) came to the compound gate, pleading for refuge. In July 1990, I was sheltering nineteen IDPs in the two downstairs apartments in the compound.

13. I eventually also housed my friend, AFL Colonel Chris Doe (of no relation to President Doe). I became friends with Chris some years beforehand and saw him frequently over the course of the summer of 1990 in Monrovia. Chris was an Americo-Liberian, who was a

child of a diplomat and had spent years in the United States and United Kingdom. Over the summer, he would visit me increasingly exasperated, explaining that he was trying to stop out-of-control AFL soldiers from indiscriminately killing people, including men suspected of supporting Charles Taylor. He shared stories that AFL soldiers would take pieces of the dead bodies to eat as “juju,” acquiring their victims’ power. Chris was risking his life on a daily basis by challenging out-of-control soldiers who were often drunk or on drugs, so I persuaded him to stay at the USAID guest compound with me. At first, he spent a night at my place here and there, but he eventually moved in and stayed put. We all expected the conflict to end shortly.

14. While staying at the USAID guest compound, I had dozens of encounters with AFL soldiers patrolling the neighborhood. In one instance, several men from the AFL tried to take away one of the Gio IDPs staying with me. The AFL soldiers were dressed in olive green uniforms, boots, and helmets, and their vehicles were equipped with military equipment. They held automatic weapons, including M16s, AK-47s, and Uzis. When I confronted them in front of their jeep and told them that the compound was U.S. Government property, they let the man free. On another occasion earlier in the year, AFL soldiers blocked the street near the home of Robert Phillips, a descendent of a former Liberian president. I was trying to pass through that street, but the AFL soldiers told me to take a detour around it. Later that night, Phillips was butchered in his home. On other occasions, AFL soldiers confronted me, but they would release me upon hearing my voice—which they recognized from my wildlife radio show.

III. Lutheran Church Massacre

15. Shortly after I arrived in Monrovia in June 1990, I helped distribute rice and canned chicken to IDPs in refugee camps across town as part of the United Nations’ food distribution efforts. The Lutheran Church was only four blocks away from the USAID guest

compound, where I lived. I helped distribute food to these locations, and I never saw any armed or uniformed individuals among the refugee populations staying there.

16. On July 30, 1990, I heard a large amount of gunfire in the neighborhood. People were radioing into the U.S. Embassy in a panic, reporting a massacre at the Lutheran Church compound. Soon after, my friend Howard Alride, the caretaker of the main USAID compound and the sole USAID contractor remaining in Monrovia, radioed that badly wounded survivors were fleeing from the Lutheran Church to the main USAID compound, all in desperate need of medical attention. Because both the U.S. Embassy and Médecins Sans Frontières (Doctors Without Borders) were in INPFL and NPFL-controlled territories respectively, neither organization could provide humanitarian assistance.

17. Recognizing the urgency of the situation, I climbed over the back walls of the guest compound and ran to the nearby Don Bosco Catholic Church compound, where missionary workers were sheltering. I asked the nurses there to come with me to the USAID compound, but they were too terrified to go. Instead, they gave me two large boxes of gauze and a container of Betadine, which I carried as I ran over to the USAID compound alone. When I arrived at the compound, I radioed Howard, who let me in through the gate. At one corner of the compound, there was a shed with a corrugated roof, where I saw people were huddled. Over the course of my time at the compound, I believe I helped thirteen wounded survivors of the Lutheran Church Massacre. But I was so overwhelmed by the carnage that I can only clearly remember the first four victims.

18. The first victim that I treated was a little girl, perhaps five years old, who had her hand wrapped in what appeared to be an adult male's white underwear. When I pulled off the cloth from her hand, I discovered a bullet hole that had penetrated the back of her hand and

exploded out of her palm, peeling away skin and flesh. I cleaned her wound and placed the flesh of her palm back in place, wrapping it with gauze. Another little girl that I treated had gunshot fragments in her face, some visibly floating inside one eye. There was also an old woman, around 70 years old, who was very thin, naked, and lying on a cot. She had taken a bullet through her hip, which blew out a large chunk of flesh from her buttock. I knew that she desperately needed surgery, but all I could do was clean and cover the wound.

19. Most of the victims were women and children. I recall seeing only one man among the wounded, dressed in street clothing. Four of his fingers had been cut with a machete and were barely dangling off the palm of his hand. I did my best to clean the wound and put his fingers into place with bandages. Again, I knew that these people needed emergency surgery, not first aid.

20. As I was treating the survivors, I could see and hear uniformed AFL soldiers circling the one-square-block compound just on the other side of the fence in open-topped jeeps, just minutes from the Lutheran Church—firing automatic weapons into the air. It was terrifying. As I started walking back to my compound, several of the wounded tried to follow me, but I told them to stay in the compound because I feared they would be killed if they were found on the streets. On my way back from the main USAID compound, I encountered several AFL soldiers walking on foot, but they let me pass when they recognized my voice.

21. Months later I was able to communicate with Howard, who told me that after I left the USAID compound, all of the survivors of the massacre that I had treated were rounded up by the AFL soldiers, taken to the beach, and executed. I believe Howard was telling the truth. His account squared with my own experience, which I explain below: when I was imprisoned, I

heard about beach burial duties performed by other captives, and when I was released from captivity, I witnessed firsthand dozens of civilians being lined up on the beach by AFL soldiers.

IV. Arrest and Detention – August 1990

22. After the massacre at the Lutheran Church compound, Monrovia became further besieged, with no escape for the AFL.

23. On the morning of August 10, 1990, seventeen AFL soldiers with automatic weapons appeared at the USAID guest compound where I was staying and ordered me to let them in. The main iron gates to the downstairs entryway were locked, and the soldiers were all piled up at the gate. After speaking with them, I decided that I needed to contact the U.S. Embassy and started up the stairs—at which point they opened fire on the front of the building. Reaching the upstairs hallway, I dove to the ground and radioed the U.S. Embassy. I was advised that given the choice of letting the men in or their forcing their way in, I should let them in. So, I went back downstairs and opened the gate.

24. When the AFL soldiers followed me up the stairs into my apartment, they saw all of the IDPs, as well as my friend Chris, sitting on the floor. They immediately recognized Chris since he was a Colonel and greeted him as “boss man.” The AFL commander ordered that everyone be taken out and killed. But as soon as the soldiers saw the television, refrigerator, furniture, carpets, and other valuables, they started looting the apartment instead. When they found Chris’s M16 hidden in the apartment—which I was unaware of—they dragged me and Chris out of the compound. I was thrown into the back hatch of a jeep, with a cocked revolver against my temple.

25. Chris and I were separately taken to the Executive Mansion compound, where I spent nine nights in a cinder-block detention cell, approximately 30-feet deep and 15-feet wide.

There were about 20 young Liberians—all but one male—inside the cell, all in their underwear briefs and nothing else. Every night, the door would open in the dead of night, when everything was pitch black, and an AFL soldier with a scimitar would walk up and down with a flashlight. The soldier would then point someone out and say, “I’m going to fuck with you!” at which point other AFL soldiers would grab that person and drag them outside. I would hear horrendous screaming outside until it stopped. Other detainees were sent out for burial duty, reportedly burying people killed by the AFL on the beach behind the Executive Mansion.

26. One day, Chris was brought into the detention cell. We were able to talk in hushed whispers, and he explained to me that the AFL was framing him as a rebel sympathizer and me as a Central Intelligence Agency (“CIA”) agent. AFL soldiers took Chris away the next morning. On about the fifth day of my detention, two young soldiers—whom I believe were planted by the AFL—were locked up and laughing over how my friend Chris was executed. According to these men, Chris was killed by a gang of soldiers with machetes.

27. I was escorted out of the cell on several occasions during my detention. From what I could observe on these occasions, the Barclay Training Center and Executive Mansion seemed well organized, with commanders maintaining command and soldiers following orders. On one occasion, on about the third day of my detention, six male and female soldiers from the President’s Special Anti-Terrorism Unit (“SATU”)—identifiable from the other AFL soldiers because of the .45-caliber bullets hanging from chains around their necks—ordered me to follow them to a small-framed building, into an office. There was a man there who introduced himself as “Colonel Moses Thomas,” and the SATU soldiers who escorted me appeared to defer to him. I recall that he handed me a can of peaches.

28. On another occasion, around the sixth day of my detention, I was taken by SATU soldiers to see General Nimely. He was sitting with members of Doe's cabinet on couches in a screened outdoor building. I recognized the Information Minister and the Defense Minister. Nimley told me he would let me go if I signed a statement admitting that I was working with the rebels, which I refused to do.

29. On August 19, 1990, SATU soldiers came to the cell, said "white man," and threw a children's sized t-shirt at me. They brought me to a jeep, where I was seated and driven through the back gate of the Executive Mansion compound. The jeep drove down the beach road, where I saw dozens of plain-clothed civilians, including many women wearing traditional lapa skirts, standing in one long line parallel to the shore with their backs to the water. I could see uniformed AFL soldiers walking alongside them and pulling items from them. I worried the soldiers were lining up these civilians on the beach, preparing to execute them.

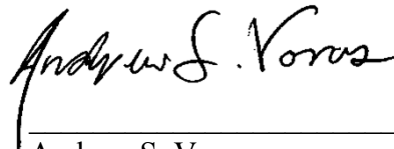
30. The jeep took me to the AFL commanding Colonel's office, where I was greeted by two officials from the U.S. Embassy—the medical officer and the CIA Bureau Chief. The Colonel explained that the AFL had decided to release me, despite the fact that I had supposedly been a sniper killing AFL soldiers from my compound. A copy of a declassified U.S. government cable referencing my detention and recounting that "[t]he government ha[d] accused the American relief worker it detains of subversive activities" is attached to this Declaration as Exhibit A. A copy of another declassified cable describing my release to the U.S. Embassy is attached as Exhibit B.

31. I was evacuated by helicopter from the U.S. Embassy compound and brought to Freetown, Sierra Leone for medical treatment and returned to the United States shortly thereafter.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 1, 2021 in Rahway, New Jersey.



Andrew S. Voros

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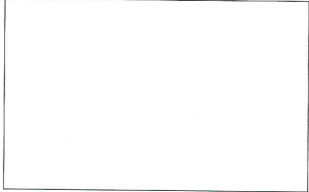
Defendant.

Case No. 2:18-CV-00569-PBT

EXHIBIT A

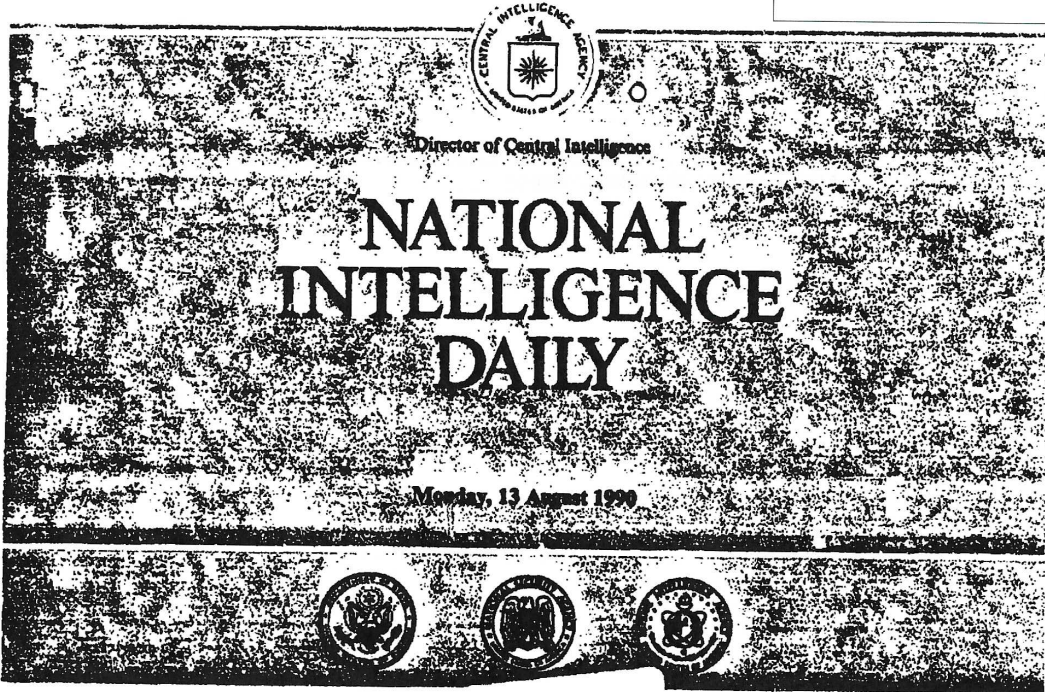
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13 August 1990

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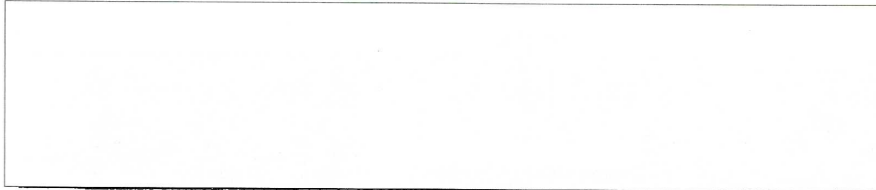


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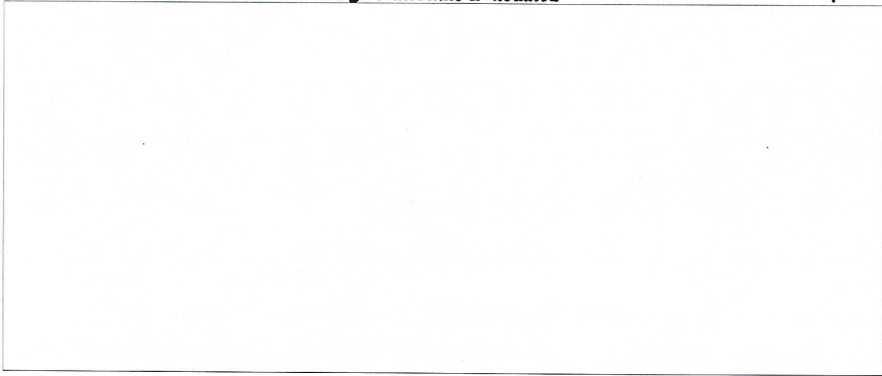


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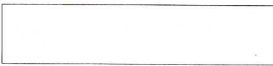
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Liberia: Foreign Nationals Evacuated

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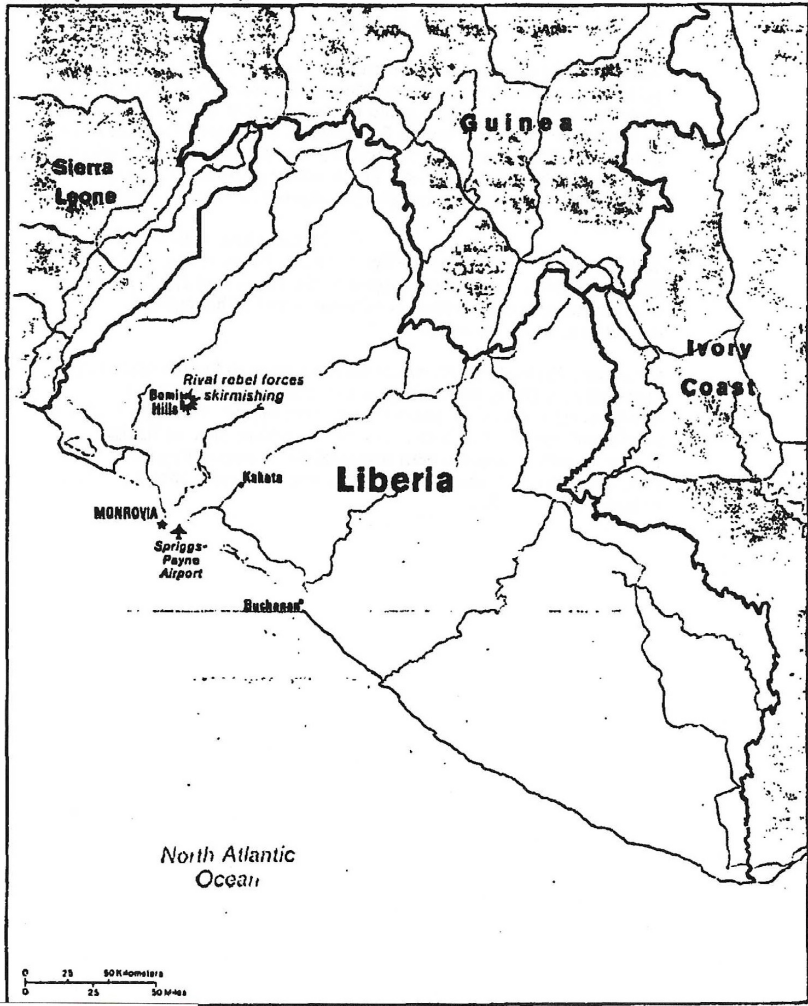
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Military Situation, 12 August 1990



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LIBERIA: Foreign Nationals Evacuated

About 400 foreign nationals—including some US citizens and about 300 Nigerians—safely evacuated Monrovia yesterday. Rebels loyal to Charles Taylor escorted the group to Kakata; tomorrow they will go to Buchanan for evacuation to Freetown by elements of the US naval task force. The government has accused the American relief worker it detains of subversive activities. The military positions of the three rival forces in the capital remain unchanged despite continued heavy fighting.

[Redacted]

Meanwhile, 120 Nigerian combat troops and military vehicles arrived by air on Saturday in Freetown; this is the first contingent of the estimated 2,500-man peacekeeping force; a second contingent, 1,000 Ghanaians, is expected to arrive by sea today.

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Comment: Taylor probably hopes his assistance to foreign nationals—especially the Nigerians—will gain him good will, despite his adamant rejection of the peacekeeping contingent. Although Taylor's rebels continue the battle to capture entry points such as Spriggs-Payne Airport in order to deny access of the peacekeeping force to the city, ongoing skirmishes with the army and Johnson's rebels continue to bog down his effort.

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TCS 2888/90
13 August 1990

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Defendant.

Case No. 2:18-CV-00569-PBT

EXHIBIT B

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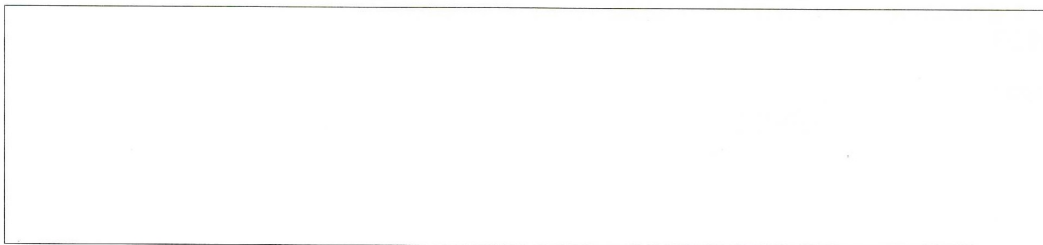
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FROM: DDI/O/CPAS.

BODY SUBJECT: MIDDLE EAST AREA BRIEF OCPAS MEA 90/194 FOR 20 AUGUST
1990.

CONTENTS

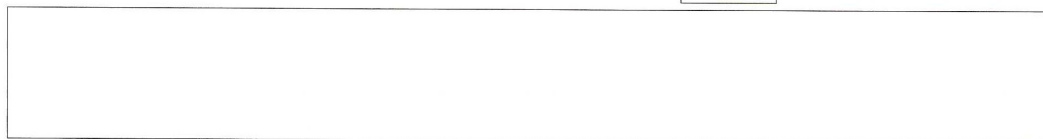
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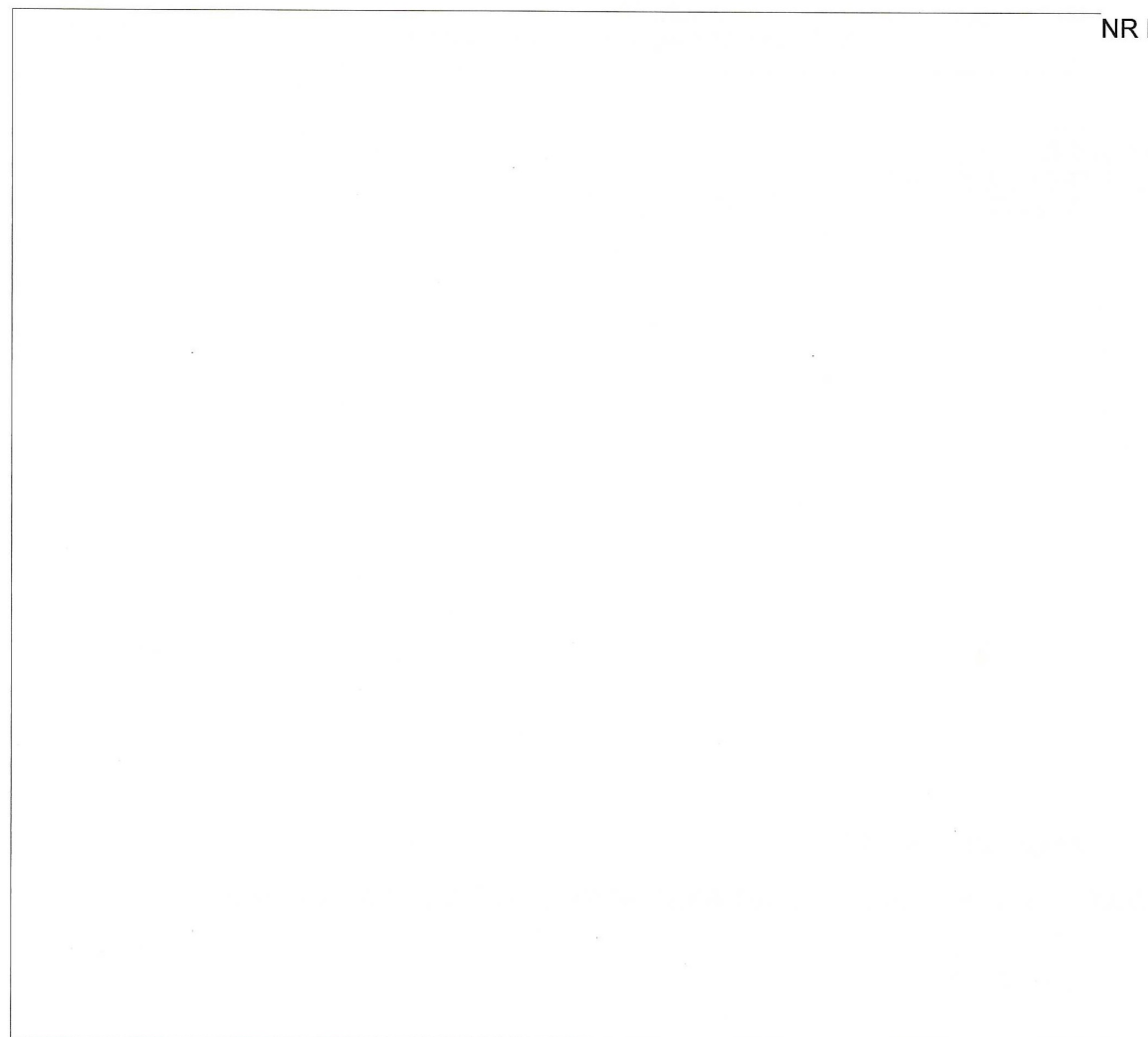
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5. LIBERIA: TRUCE BETWEEN DOE AND JOHNSON

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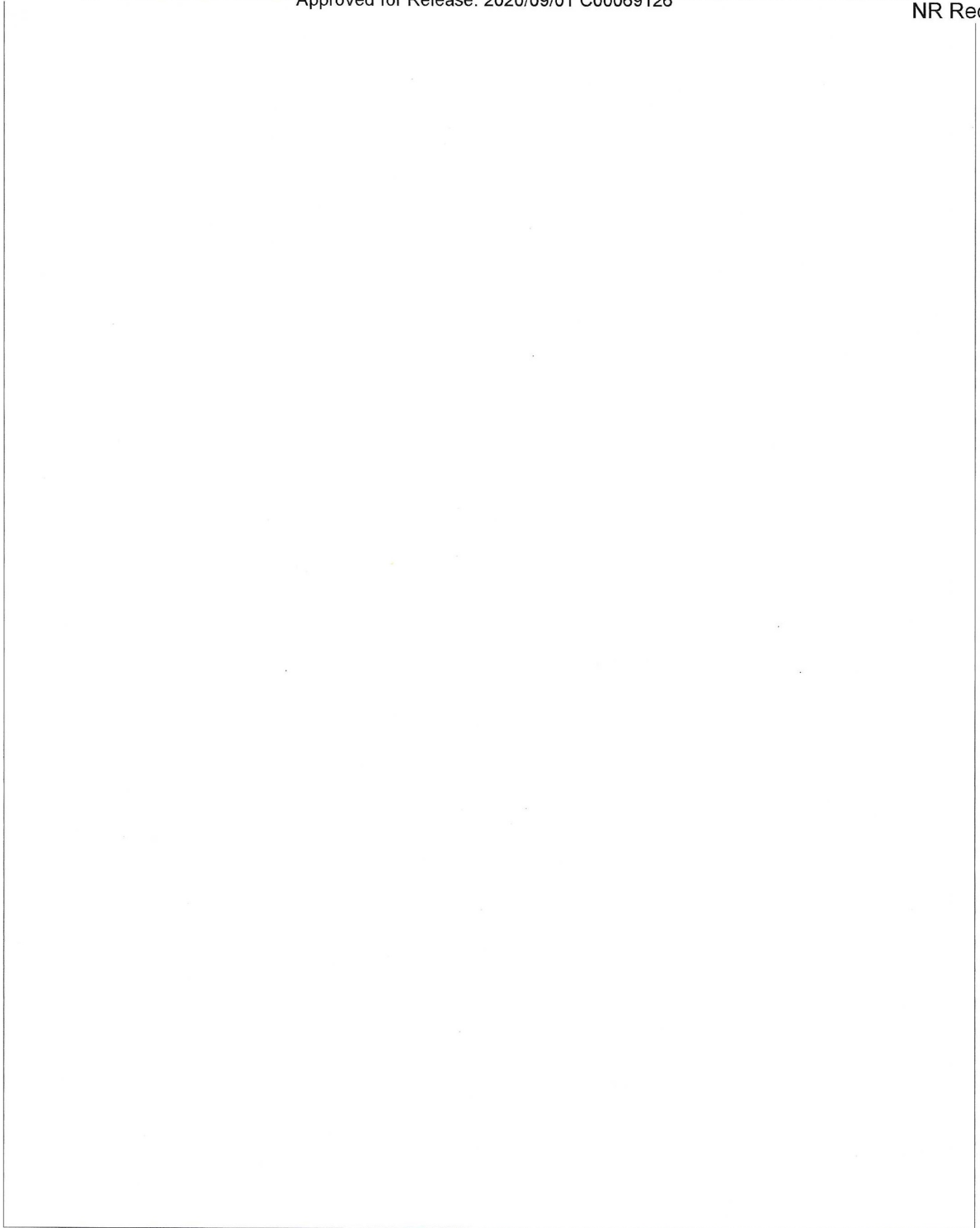


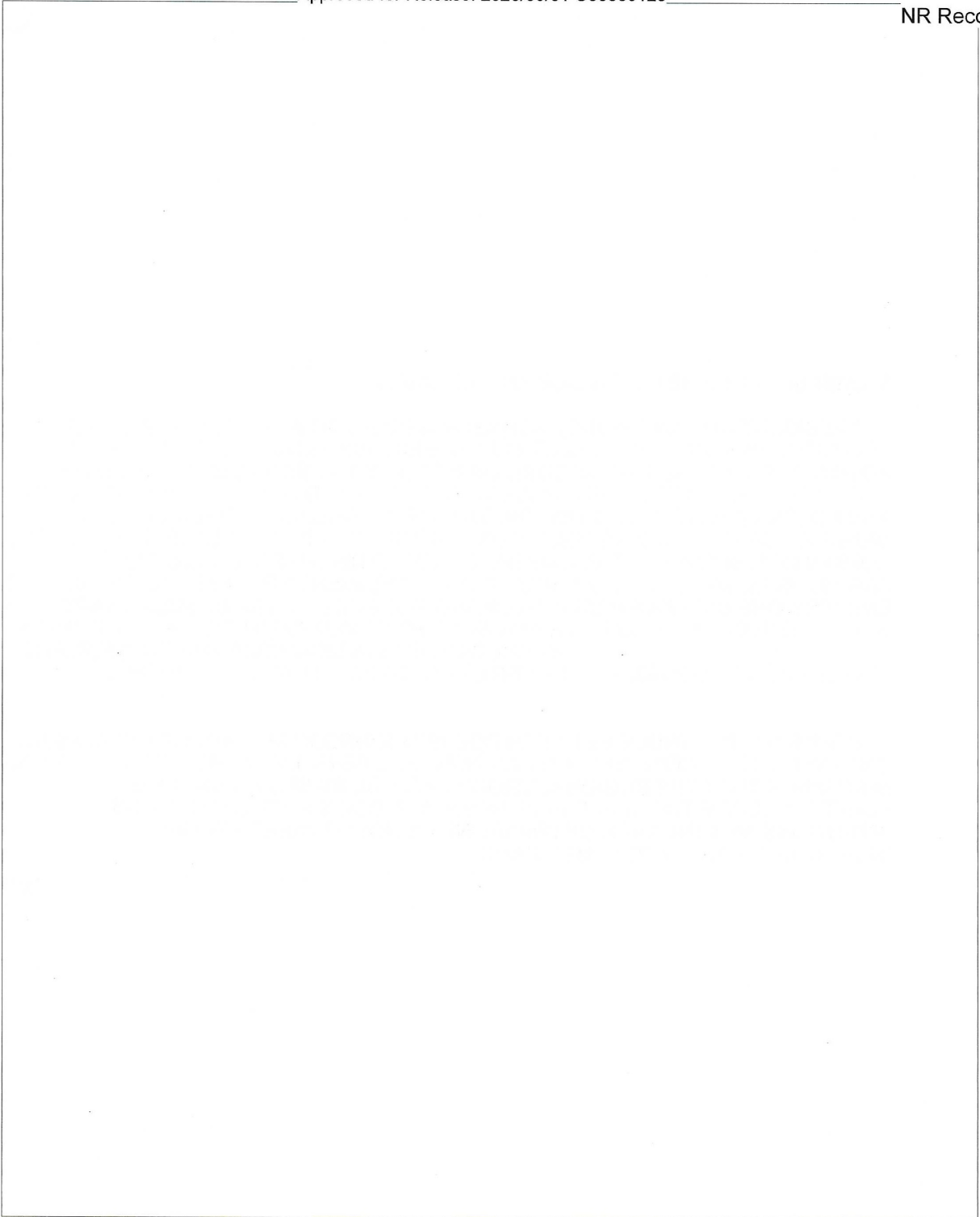
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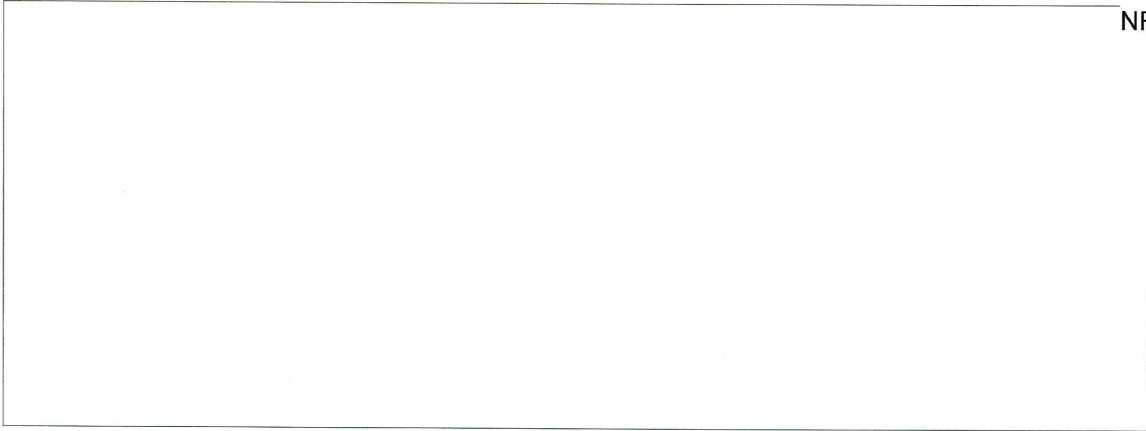
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5. LIBERIA: TRUCE BETWEEN DOE AND JOHNSON [redacted]

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PRESIDENT DOE AND PRINCE JOHNSON AGREED TO A TRUCE ON SATURDAY, FOLLOWED BY A DAYLONG CELEBRATION, INCLUDING LOOTING, BY TROOPS ON BOTH SIDES. A CEASE-FIRE ACCORD DRAFTED BY THE ECONOMIC COMMUNITY OF WEST AFRICAN STATES WAS CIRCULATED TO DOE AND JOHNSON THIS WEEKEND AND POSSIBLY TO CHARLES TAYLOR. TAYLOR IS SCHEDULED TO MEET WITH MEMBERS OF THE ECOWAS MEDIATION COMMITTEE AND THE PEACEKEEPING FORCE COMMANDER IN BANJUL, THE GAMBIA, TODAY TO DISCUSS THE FORCE'S ARRIVAL IN MONROVIA. MEANWHILE, THE GOVERNMENT RELEASED TO THE US EMBASSY ONE UNHARMED US CITIZEN AND THE BODY OF THE US MISSIONARY WHO DIED IN CUSTODY AFTER BEING SHOT BY GOVERNMENT TROOPS LAST WEEK.

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[redacted] AT CHECKPOINTS IN MONROVIA THE GOVERNMENT IS ATTEMPTING TO SINGLE OUT AMERICANS TRYING TO PASS THROUGH. [redacted]

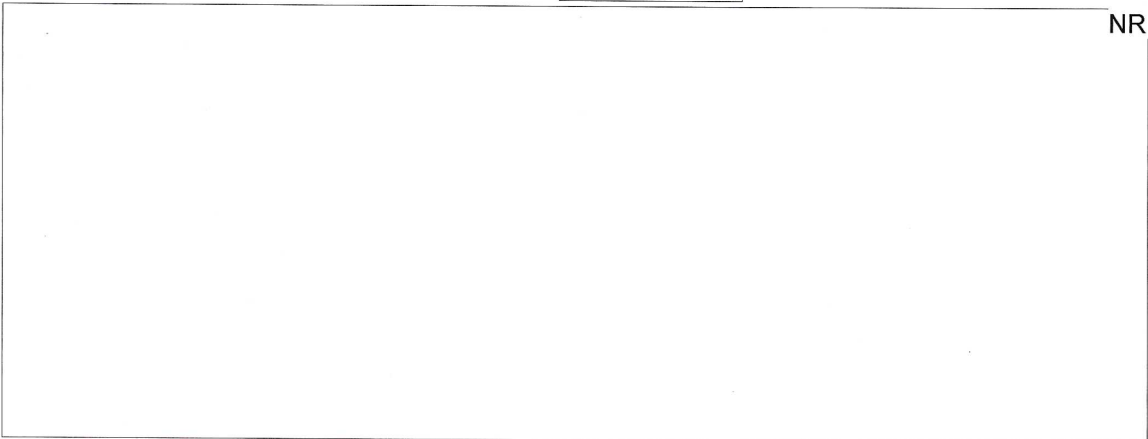
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COMMENT: THE TRUCE BETWEEN DOE AND JOHNSON MAY NOW PUT PRESSURE ON TAYLOR TO ACCEPT THE ECOWAS PEACEKEEPERS, EVEN THOUGH TAYLOR HAS MISGIVINGS THAT THE REGIONAL TROOPS WILL BE BIASED AGAINST HIS FORCES. DESPITE THE CEASE-FIRE, HOWEVER, DOE'S SUSPICIONS OF US INTENTIONS AND THE LACK OF DISCIPLINE BY GOVERNMENT TROOPS INCREASINGLY THREATEN AMERICANS. [redacted]

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NR Record



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END OF MESSAGE

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