

**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 ELIZABETH BLUNT
IN SUPPORT OF PLAINTIFFS' JANE W, JOHN X, JOHN Y, AND JOHN Z
MOTION FOR SUMMARY JUDGMENT**

I, Elizabeth Blunt, declare under 28 U.S.C. § 1746 that:

I. Personal Background

1. I am a freelance journalist and broadcaster, and a former British Broadcasting Corporation (“**BBC**”) correspondent.

2. After receiving a degree in history at Cambridge University in 1968, I started to work at the BBC. My training program there involved work in studios, where I made recordings and prepared transmissions for the radio. I then worked in Tanzania as a sound recordist on a film. When I returned to England, I became a writer and producer with the BBC, writing current affairs scripts for the Africa Service. My scripts were translated into many African languages for broadcast, including Swahili and Arabic. My early period with the BBC included reporting trips and working in newsrooms, so when the BBC posted a job for a BBC correspondent in West Africa, I applied and was accepted.

3. My BBC correspondent position began in 1986, and I was based in Abidjan, Côte d’Ivoire. My reporting covered countries in the region, including neighbouring Liberia, as well as Mauritania, the Democratic Republic of Congo (then known as Zaire), and Chad. I covered this region from 1986 until the first week of November in 1990, and I later returned for six months in 1997. It was BBC policy for new regional correspondents to visit each country within their purview as soon as possible. I first visited Liberia in August 1986, though my reporting and the BBC’s news coverage did not focus heavily on Liberia until the conflict broke out in December 1989. During 1990, I made six trips to Liberia to report on the war.

4. I returned to London later in 1990 and was part of the team starting up the BBC’s World Service television operation, before going to work in the Delhi Bureau as a bi-media producer. I returned to Abidjan in 1997 for six months, to cover a gap between correspondents. While in London I worked in News Intake, planning the coverage for World Service News and

liaising with correspondents around the world about their reporting. At various times I also worked as a Home-Based Foreign Correspondent—a job that entailed reporting from London, traveling to cover gaps for absent colleagues, and assuring suitable reporting for World Service on major events. I retired in 2006, though I went to Ethiopia for the BBC for two years thereafter as an Addis Ababa reporter.

II. Early Reporting on Liberia

5. Around Christmas Eve of 1989, a group of Charles Taylor’s followers (the National Patriotic Front of Liberia, or “**NPFL**”) attacked a military outpost of then Liberian President Samuel Doe’s Armed Forces of Liberia (“**AFL**”) in Nimba County, setting off a civil war. As a result of this attack, I went to Liberia on January 7, 1990 for six days.

6. When I returned to Abidjan on January 12, 1990, I continued to closely monitor and report on the conflict in Liberia. While outside Liberia I sought information on recent developments in the country by talking to people who had fled the country (many of whom came through Abidjan), having telephone conversations with the companies and organisations who still had contact with staff in Liberia, exchanging information with other journalists, and listening to interviews given by Liberians to my BBC colleagues in London.

7. I made many trips to Liberia during the remainder of 1990: I was in Liberia from April 4 to 8 and 18 to 24, from May 21 to June 8, from June 27 to July 14, and from September 3 to 19. During these trips, I reported on developments in the war that I observed in Monrovia and the areas that I could reach from there, including Nimba County and Buchanan in April and Harbel in May.

III. Monrovia, May-July 1990

8. When I was in Monrovia in May and June 1990, conditions were deteriorating. AFL forces would target people from the Mano and Gio tribes—especially those who had been

displaced from Nimba County, where the NPFL launched the attack that started the war. The AFL forces associated the Manos and Gios with the rebels because most people from Nimba County were Mano or Gio.

9. In May, there was a series of murders of young Gio and Mano men, both soldiers and civilians. AFL soldiers went into Mano and Gio houses, threatened the residents, and dragged away the young and middle-aged men. Their mutilated and sometimes decapitated bodies would later turn up on the streets and in creeks. As well as taking away men and boys, the soldiers would steal any money they had and possessions such as mattresses and radios. Under cover of darkness, the soldiers also broke into shops and warehouses and stole vehicles. Many owners took the wheels off their cars and hid them, so that their vehicles would not be stolen. I often heard gun shots at night, which I believe AFL soldiers fired in the air to try to intimidate people and keep them away.

10. People from the Mano and Gio communities told me that they were afraid to sleep in their own homes at night because of their fear of being targeted by AFL forces. They began seeking shelter in churches, schools, the United Nations (“UN”) Compound, and other places in Monrovia they believed were safe.

11. A transcript of my report on the fact that bodies of the AFL’s victims were rotting in various places around the city and the fears expressed by Mano and Gio residents is attached to this Declaration as Exhibit A.

12. On May 29, 1990, AFL soldiers attacked the UN Compound, where several hundred people, mostly from the Gio and Mano communities, were seeking refuge. Eyewitnesses told me that eight AFL soldiers, some of them masked, came to the compound between three and four o’clock in the morning. After shooting dead a civilian security guard and

wounding two other men, then rounded up about thirty men and boys who were sleeping in the compound and took them away. The dead bodies of some of the group were later found near the beach.

13. I interviewed two survivors from the group and reported on June 2, 1990: “[T]wo survivors of the group taken from the United Nations have now told their stories. Both described how they were taken with a jeep-load of other men and boys to an area near the sea on the edge of town, lined up and sprayed with gunfire. Both young men were wounded, one seriously, but managed to play dead, and later crawl away from the site of the killings.” The script that I wrote for that broadcast is attached to this Declaration as Exhibit B. I do not know what happened to the soldiers who carried out the attack, but I did not hear of any disciplinary proceedings against them. As far as I remember, the survivors of the attack stopped sleeping at the UN compound after that, because they no longer felt safe there. I don’t know where they went, though I suspect it was probably to some of the other supposedly safe places in the city, which included several churches.

14. The AFL also targeted Mano and Gio soldiers within their own ranks. On June 6, 1990, the AFL rounded up two or three hundred Mano and Gio AFL soldiers from the Barclay Training Center (the “**BTC**”) and arbitrarily detained them in the Post Stockade prison. I learned about this incident from the detained soldiers’ wives and other family members, who recounted how “their men were locked up.” As I reported at the time, I also spoke to one staff sergeant who managed to slip away and avoid the round-up. A transcript of my report is attached to this Declaration as Exhibit C. My understanding is that the AFL targeted and “neutralized” these men in this manner out of fear that they would defect and assist the NPFL.

15. As tensions escalated, those who could leave Liberia did so. On May 31, 1990, the United Nations evacuated its international staff and closed its offices. However, I stayed in Liberia to continue my reporting.

16. By July 1990, the rebel forces were converging on Monrovia, Liberia. Charles Taylor's NPFL forces were entering the city from the east, whereas Prince Johnson's rival rebel group, the Independent National Patriotic Front ("INPFL"), was approaching the city from the north. As I reported at the time, by July 27, 1990, Taylor's forces had reached the transmitters and studios of Liberian national radio, ELWA, in Paynesville, about six miles from the city centre. A copy of my script for the July 27 broadcast is attached to this Declaration as Exhibit D.

17. The Liberian Government and its AFL forces were trapped in the centre of the city, and they were panicking. There was no way out of the central city, and no cars, water, or food for ordinary soldiers. Around this time, there were rumours that the Americans were going to evacuate President Doe by helicopter—leaving the rest of the AFL soldiers at the mercy of the rebels.

18. The AFL's enclave in Monrovia was centred on the Executive Mansion, where a contingent of elite, well-armed AFL soldiers were based. Although the NPFL were approaching Monrovia, through late July 1990, the AFL was based around the Executive Mansion and maintained control of the Sinkor area of Monrovia, which included St. Peter's Lutheran Church (the "**Lutheran Church**").

19. The many Manos and Gios fleeing the AFL forces had sought shelter in churches and schools in Monrovia. By late July 1990, diplomats and aid workers in Monrovia had warned of the vulnerability of churches and schools serving as shelters, given the number and Mano and Gio people concentrated there, including young men whom the AFL suspected of sympathizing

with the rebels. A transcript of my report discussing these concerns is attached to this Declaration as Exhibit E.

IV. Lutheran Church Massacre

20. As tensions escalated, the Lutheran Church served as a shelter for internally displaced persons seeking refuge. I visited the Lutheran Church with other journalists during the daytime at the beginning of June 1990. Large Red Cross flags marked each of the four corners of the compound. Inside, the building was full of women and children. Virtually everyone there was from Nimba County, from the Gio or Mano tribes.

21. By then, the city had no electricity or running water, and the women were collecting rainwater to wash their clothes and keep the children clean. Many of the children suffered from pink eye, and even our photographers contracted pink eye from their visit. There were fewer people there during the day because the men were out working, but altogether, I understand that approximately 2,000 to 3,000 people slept at the Lutheran Church at night. We were told that the men and boys slept in the church, whereas the women, girls, and babies slept in the school annex attached to the church. A description of what I saw that day was included in my radio transmission on August 3, 1990. A copy of the script I wrote for that broadcast is attached to this Declaration as Exhibit F.

22. I never heard that NPFL rebels were staying at the Lutheran Church, nor did I see anything there to support that claim. Rather, the people staying at the Lutheran Church were likely seeking refuge because they did not want to join the rebels; had they wanted to join the rebels, they could easily have done so months earlier. Moreover, the Lutheran Church and the Red Cross were punctilious—they would have been extremely careful not to shelter rebels.

23. On July 29, 1990, the day of the Lutheran Church massacre, I was in Abidjan. Members of the diplomatic community were among those who went to the Lutheran Church the

next day, and they began to spread the news of what happened. Based on my interviews with survivors and witnesses, I understand that the attack began at night. As I reported on July 30, 1990, eyewitnesses recounted seeing bodies of adults and children alike covering the floors and hanging from the windows. One interviewee, who went to the church the morning after the attack, said she could not walk across the floor without stepping on people. Women lay dead on the ground, some with their babies still tied to their backs. One baby was crying beside its dead mother. Exhibit E.

24. Although I initially reported that 200 people were killed, that number was an underestimate. The BBC's policy was to be quite conservative and report the lowest end of death toll estimates. But as clarified hours later in the BBC World News program, eyewitnesses reported that at least 600 people were killed. A transcript of this report is included in Exhibit E. In retrospect, I agree that the number of casualties was at least 600 people, given the fact that the floor was carpeted with bodies.

25. Survivors and witnesses I interviewed said that approximately thirty AFL soldiers armed with automatic rifles perpetrated the massacre. The witnesses knew they were AFL soldiers, rather than NPFL soldiers, because the men were in military uniform. The AFL wore olive green army uniforms—often in camouflage similar to U.S. military uniforms—whereas the NPFL did not have a formal uniform and wore a random selection of military and civilian clothes.

26. I do not think the AFL's motive was solely to target potential rebel fighters. If that were the case, the soldiers would not have attacked the women and girls in the school annex;


since the compound was strictly segregated by sex at night, they could have just killed the men and boys in the church. Nor was it likely that robbery was their main motive, although one of my interviewees, who owned a bar next to the Lutheran Church, reported that the soldiers stole everything there, including even toilet bowls and wash basins.

27. Whatever the motive, the Lutheran Church massacre was a truly appalling event, and contributed to the decision by the Economic Community of West African States (“ECOWAS”) to send a UN peacekeeping force into Monrovia. As I reported at the time, “[r]eports of massacres on churches and streets littered with unburied bodies [] pushed other West African leaders to talk of acts ‘contrary to all recognised standards of civilised behaviour’ and start making plans for a military intervention.” A copy of the script I wrote for that broadcast is attached to this Declaration as Exhibit G. At one ECOWAS meeting, a number of participants, including the chairman, Gambian President Dawda Jawara, expressed to me their shock at what had happened at the Lutheran Church. As I reported, President Jawara said in his opening address to the meeting that “Liberia is rapidly becoming a slaughterhouse and its neighbours could not afford to let the situation deteriorate further.” A transcript of my reporting on his opening statement is included in Exhibit H.

* * *

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

Executed on March 1, 2021 in London, United Kingdom.



Elizabeth Blunt

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Defendant.

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EXHIBIT A

Liberia

Report of 11 July Attack on Monrovia's Port

*AB1207172590 London BBC World Service in English
1615 GMT 12 Jul 90*

[From the "Focus on Africa" program]

[Text] Liberia's chief negotiator for the rebel National Patriotic Front, Tom Woewiyu, has already thrown a spanner in the works of the ECOWAS [Economic Community of West African States] peace talks in Freetown on the day after he arrived. He has rejected proposals for a cease-fire, and for an ECOWAS peace-keeping force. And the war goes on, with the capital, Monrovia, virtually cut off as the rebels close in. There are reports of attacks by sea and land, and of atrocities and revenge killings on both sides. Journalists in Monrovia —among them our correspondent Elizabeth Blunt—sent this latest report last night on the fighting:

[Begin studio announcer recording] Two Coast Guard vessels flying the scarlet rebel flag, fired on the city's port early Wednesday [11 July] before being driven off by rocket and machine gun fire. A cannon installed at President Samuel Doe's fortified cliff-top Executive Mansion, about a mile or two kilometers from the port, fired two rounds at the rebels, and missed. On Tuesday [10 July] heavy fighting erupted in the northern and eastern suburbs, shaking windows and houses in the center of town. According to witnesses, the Army fired about 10 rockets from the Soviet-designed BM-21 launcher at a large rebel force in the eastern suburb of Paynesville. The recently-appointed chief of staff, Lieutenant General Charles Julue, formerly the head of Doe's Executive Mansion Guard, returned to Monrovia. It had earlier been reported that he resigned and fled. Julue had been appointed a week earlier to replace Lieutenant General Henry Dubar who fled abroad two weeks earlier. Associates who have seen Julue since his return say he left to buy more arms, and in particular, ammunition, which is running short. But they say neighboring Guinea refused to supply arms, to avoid compromising its position as a mediator in peace talks.

The atmosphere in the Liberian capital remained extremely tense. Residents are weary of the shortages, the curfew, and the nightly gunfire in the blacked-out city. They are also frightened by tribal reprisal killings by the army. Bodies of victims still lie rotting in various places around the city. The U.S. ambassador, Peter de Vos, said his government had expressed very grave concern about the indiscriminate killing of civilians by soldiers. He also complained about the diversion of

humanitarian assistance from international donors, which was intended for people displaced by the fighting. Among goods recently looted by soldiers from the port were 200 tons of rice and other supplies left by the UN Disaster Relief Organization, which pulled out of Liberia after soldiers attacked refugees at its compound in Monrovia at the end of May.

Ambassadors of the five European Community countries represented in Liberia: France, Italy, West Germany, Spain, and Britain, called on Liberian Army leaders to control their troops and cease what they called the wanton killing of civilians and the indiscriminate looting taking place in Monrovia. They also appealed to the National Patriotic Front rebels to stop killing civilians, particularly members of the Krahn and Mandingo tribes. Doe belongs to the Krahn tribe, and Mandingos are accused of supporting him. [end recording]

EXHIBIT A

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EXHIBIT B

EB
N 289.

Monrovia 2nd June.
^{title} Red Cross protects Liberian terror victims

CVE: In the Liberian capital Monrovia, a complex of church building has been put under Red Cross protection to serve as a refuge for people afraid of the activities of army death squads. Up to a thousand people a night had been sleeping at the United Nations compound in Monrovia, but on Wednesday armed soldiers raided the compound and took a number of people away. EB reports from Monrovia.

(CHILDREN)

During the day the Lutheran church and school compound in a Monrovia suburb is relatively empty; church workers ~~occupied~~ ^{occupy} a classroom full of small children with gospel hymns, another and babies ~~sleep~~ ^{doze up} ^{around their} ^{cries}. Outside volunteers are busy putting up large Red Cross flags at each corner of the compound in the hope that the symbol of international protection will prevent any further visits from vengeful soldiers.

But as night falls the compound fills up with hundreds of other frightened people, all from the Nanba area, where the attempt to overthrow President Doe

government began five months ago. The Nimba people ~~are~~ ^{have} now ^{become} the victims of nighttime raids by army death squads as the rebel army threatens the capital. Church workers at the compound say nearly 1,400 people have sought protection there since the centre opened three ~~days~~ ^{nights} ago.

It is now clear that the Nimba people's fears are well founded; two ~~wounded~~ survivors of the group taken from the United Nations have now told their stories. Both described how they were taken with a jeep-load of other men and boys to an area near the sea on the edge of the town, lined up, and sprayed with gunfire. Both young men were wounded, one seriously, but managed to play dead, and later crawl away from the site of the killings.

The United Nations withdraw all its staff from Liberia this week in protest against the raid on its premises.

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EXHIBIT C

Gio, Mano Soldiers Detained

*AB0606214490 London BBC World Service in English
1830 GMT 6 Jun 90*

[From the "Focus on Africa" program]

[Text] The Liberian Government has taken further action against Gio and Mano soldiers in the Army. They of course come from Nimba County where the rebellion against the government first started. They have already had to face a number of restrictions, but now the government has taken further measures. On the line to Monrovia, I asked Elizabeth Blunt what those were:

[Begin recording] [Blunt] Well, last night, I called at about half past two in the morning. All the Mano and Gio soldiers inside the barracks were [word indistinct] and gathered together. They were told that somebody had something to say to them. When they were gathered, they were told to strip and then they were taken off to the military prison in the barracks which is called the post stockade. This was told to me by one staff sergeant who managed to slip away and get over the wall and escape. The ones who were sleeping in the town were arrested as they came to work. There was a big roadblock this morning, at about seven a.m. this morning, outside the training center and passersby saw a lot of checkpoints, soldiers taking people, soldiers taking other soldiers away.

[Marshall] So, how many are being, well, detained indeed?

[Blunt] I really do not know. I mean the estimate I was given by Mano and Gio people who were involved, and who are obviously partisans, range from 200 up to 500. The most usual figure was 200 to 300.

[Marshall] So it seems then that the government of Samuel Doe feels it can no longer count on the loyalty of Gio and Mano soldiers?

[Blunt] Well, to read the government's lines, I imagine if there was an attack on the city, then I am afraid that they would rise up within the barracks on the rebels' side.
[end recording]

EXHIBIT C

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EXHIBIT D

N 378 Liberia: Street Fighting and Taylor Claims

CUE: The latest reports from the Liberian capital, Monrovia, where rebels of the National Patriotic Front are fighting to overthrow the government of President Samuel Doe, speak of street fighting in the very centre of the city. Meanwhile the rebel leader, Charles Taylor, whose men captured a mission owned radio station in the eastern suburbs three days ago, has come on the air to declare the present Liberian government "dissolved" and replaced by a government under his own leadership. West Africa correspondent Elizabeth blunt reports:-

The latest reports by journalists make it clear that the war has now well and truly reached the centre of Monrovia. They say the rebels stormed over bridges linking the port to the city centre and speak of fighting in the main market area and on Mamba Point, where many of Monrovia's foreign embassies are situated.

The correspondents report scenes of considerable confusion, with civilians fleeing in all directions as soldiers yelled at them to get off the streets, and rebels tried to move them out across the bridges and behind rebel lines. They report eyewitnesses as saying that some soldiers stripped off their uniform and joined the fleeing civilians.

In the early evening, Liberia's protestant-owned radio station, Radio ELWA, came back on the air briefly after a three week silence, and the best known of the rebel leaders, Charles Taylor, announced that President Doe's government had been dissolved and been replaced by a National Patriotic Reconstruction Assembly under his own leadership. [Taylor's men took over the radio station three days ago, but were unable to get it on the air immediately because of lack of fuel for its generators.]

There is no indication so far of whether Mr Taylor's announcement reflects any kind of reality. Earlier in the day President Doe was still in his Executive Mansion, issuing statements

saying he would not resign, and the rebel group now threatening
Doe's fortified headquarters is led, not by Talyor himself, but by

another rebel commander, Prince Johnson.

QUB: The latest report says that the National Patriotic Front are fighting to overthrow the
government of President Samuel Doe, speak of street fighting in the
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Taylor, whose men captured a mission owned radio station in the
eastern suburbs three days ago, has come on the air to declare the
present Liberian government "dissolved" and replaced by a government
under his own leadership. West Africa correspondent Elizabeth Blair
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EXHIBIT E

difficult to take, risk their lives, while he does the organization on the political level. And it is always possible, of course, that that may pay off in the end.

[Perman] What do we know about Prince Johnson? He is a very different sort, it seems, from Charles Taylor?

[Blunt] Yes, he is different in very many ways. He is from the area where the rebellion began. He is a Nimba man, a Gio by tribe. And so of course, are most of the people who are fighting. So that is a plus-point, as far as his men are concerned. Taylor is not really a fighting man. He is Americo-Liberian by background, he is a businessman, he is a wheeler-dealer. He is very much more a civilian. People who have met Prince Johnson say he is much more a soldier's soldier. And they said to me that they did not get the impression that he did want to be president. But he would no doubt love to run the army, love to be a military commander. He is very much in love with fighting, in love with the idea of war. He is a huge man. He is six foot three, six foot four tall, very big, very imposing. And of course that goes down well with his boys as well. And he dresses them in some kind of uniform, which Taylor does not. They have got much more of a sort of professional mystic. [as received]

[Perman] Well, supposing they do overthrow President Samuel Doe—and presumably Samuel Doe cannot hold on for ever—there must be some conflict between Prince Johnson and Charles Taylor and their men?

[Blunt] Certainly, there is not much love lost between them, and what they have both been saying in the last few days bears that out. Johnson, who met some journalists yesterday in the center of town, was very rude about Taylor. He said he is not going to come here now and make himself president. He said: I will meet Taylor after Doe is overthrown. I do not want power, I want a fair election, but Taylor will manipulate the election. And at the same time, on the other side of town, Taylor is saying that he has had problems with Prince Johnson, and saying that he would grant him clemency. It does not sound to me as if Prince Johnson feels he needs to be granted clemency by Charles Taylor. [end recording]

'At Least' 200 Reportedly Killed at Church

AB3007163290 London BBC World Service in English
1500 GMT 30 Jul 90

[From the "Newsreel" program]

[Text] First reports from the Liberian capital, Monrovia, say soldiers of the army of President Samuel Doe have attacked a church, where hundreds of people were sheltering from the fighting, massacring in it sleeping inhabitants. Eyewitnesses estimated as many as 200 men, women, and children have been killed. Our West Africa correspondent, Elizabeth Blunt, reports:

[Begin Blunt recording] For the thousand or more people who have taken refuge there, Saint Peter's Lutheran Church seemed a safe haven from the army death squads

which roamed the suburbs of Monrovia at night, looking for people from the Gio and Mano tribes whom they accuse of supporting the rebels. The conditions in the church and school buildings, where they were housed, were overcrowded and insanitary, but the Red Cross flags flew at each corner of the compound and they felt more secure under church and Red Cross protection.

But last night, the refuge became a death trap. Reports from Monrovia said that the soldiers broke in at two o'clock in the morning, when people there were sleeping and massacred the inhabitants. Journalists in the city quote eyewitnesses as saying that they saw bodies hanging from the windows of the buildings and women lying dead with their heads smashed in, babies still tied to their backs. The eyewitnesses said that, at least, 200 people died, a figure borne out by diplomats in the city, who spoke of several hundred dead. Diplomats and aid workers in Monrovia had already warned about the vulnerability of the centers just because so many Gio and Mano people were concentrated in one place, including young men who might be suspected of planning to join the rebels when they finally reach the city. [end recording]

Massacre Toll Up to 600

AB3007205490 London BBC World Service in: English
2000 GMT 30 Jul 90

[From the "World News" program]

[Text] Soldiers loyal to President Samuel Doe of Liberia have been blamed for the massacre of hundreds of people sheltering from the fighting in the capital, Monrovia. Eyewitnesses said the soldiers broke into the compound of St. Peter's Lutheran Church in the east of the city during the night and shot or battered to death at least 600 people, including women and children. Earlier reports spoke of 200 killed. Many of the victims were members of the Gio and Mano tribes which are said to support the rebels. But in a statement to the BBC, a spokesman for President Doe said rebels themselves dressed in government uniforms carried out the killings.

Soldiers are also reported to have tried to enter another refuge, a technical college nearby but were persuaded by monks there to leave. The massacre has been strongly condemned by the United States, the United Nations, and the International Committee of the Red Cross.

In continuing fighting in Monrovia, eyewitnesses said rebel forces have been forced back from positions near the government-held radio station in Paynesville, about six miles from the city center. Fighting is also reported around the ELWA commercial radio station, two miles further to the east. It was previously held by the rebels.

Government Troops Withdrawing From FM Station

AB3007170890 Paris AFP in English 1604 GMT
30 Jul 90

[Text] Paynesville, Liberia, July 30 (AFP)—Rebels pursued government soldiers withdrawing from a radio

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FOR 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

EXHIBIT F

Elizabeth Blunt

Abidjan

3.8.90.

N 406 FOOC: Liberia Massacre

CUE: The world was shaken this week by reports of a massacre in a church in Liberia, where a civil war has been raging for the past seven months. Soldiers burst into the Lutheran Church complex where two or three thousand people had taken refuge and opened fire on sleeping men, women and children. At least two hundred people died. Here's our West Africa correspondent, Elizabeth Blunt:-

The last time I visited St Peters it had just stopped raining; people were picking their way round muddy puddles in the forecourt, avoiding the pails set out everywhere to catch water from the roof. There was a great din coming from one of the school classrooms -- when I peered in I could see (and smell) ~~that it was crammed with~~ a couple of hundred extremely grubby children, all singing hymns at the top of their voices.

The conditions in the church were far from ideal. ^{Even then,} It had over a thousand people sleeping there each night, the men in the church itself, and women and children in the next door school. There had never been enough toilets and washrooms even when the water was working, and now the water supply to the whole city had been cut off. A couple of weeks earlier every child in the place had had conjunctivitis, locally known as "Appollo."

It was hard to understand why people chose live in these conditions for weeks at a time, but once you got to know individuals, you began to see why.

I first met the Dolo family back in May in a local newspaper office. They originally came from Nimba County where the war began, but they had not been affected, because they lived down in Monrovia, where Mr Dolo had a job in an electronics company. But the previous night a group of soldiers

had come to their house, brought by a neighbour who was going round, pointing out the houses where people from the Gio tribe lived. The soldiers threatened the Dolos with cutlasses, saying that Gio people were rebels and that they were going to rape Mrs Dolo and her twelve year old daughter. The first group eventually went away with \$200 and a radio. But then more soldiers came with guns, demanded their mattress and the rest of their savings, and took Mr Dolo away.

When I met them again, it was at the United Nations office in Monrovia, where Gio people had begun to gather, thinking it would be a safe place for the men to sleep. By that time they'd found Mr Dolo's body, floating in Stockton Creek. The United Nations staff in Monrovia were not at all enthusiastic about having two or three hundred people a night sleeping in their compound, but they turned a blind eye. Then, one night, a jeep-load of soldiers arrived, jumped the wall, firing as they did so, and started grabbing men and boys. They drove with about thirty of them. The bodies of several were found near the beach the next day.

It was at this point that the churches opened their doors, and the Dolos moved to St Peter's Lutheran Church, the first of the refuges. Virtually everyone there was from Nimba County, from the Gio or Mano tribes, upset and indignant at the way their people were being victimised by the soldiers. They pointed out that if they WERE rebels, they would be back in Nimba fighting with the Patriotic Front; the very reason they were in Monrovia was that they had wanted nothing to do with the war. Now they were bitterly resentful of the army.

Rapidly the refuges got organised, in various schools and churches, sheltering some seven thousand people, under the

protection of the Red Cross. The people who went there were delighted; however uncomfortable, inside the gates, they felt safe.

But some of the organisers had severe misgivings. The refuges had no real protection, just a fence or a low wall, and the moral force of the clergy and the Red Cross flag. And they were known concentrations of Gio and Mano people, who now had every reason to hate the government. It didn't take much imagination to guess that if the rebels did finally arrive in Monrovia, the young men would flood out and join them. And the shelters would be so easy to attack; one grenade thrown over the wall would be enough to do dreadful damage.

When the attack did come, last Sunday night, it was worse than anyone could have imagined; men and women, children and old people, massacred as they slept. Eyewitnesses painted a scene of utmost horror -- the church floor thick with blood, bodies hanging from the school windows, mothers gunned down with their babies still tied to their backs.

Now the people from St Peters are scattered to the winds. Some finally made it to the other side of rebel lines, where they have found a ready audience for their story among the young fighters, ready to take revenge in like manner on anyone they can find from President Doe's tribe, the Krahn, or anyone who had anything to do with the army or the government.

Their stories told, they have joined the thousands of other Liberians on the move, searching for a place away from men with guns. If a place is run by foreigners, perhaps the soldiers or the rebels will stay away; so embassies, missions, even secret American military installations have been turned one

after another into spontaneous refugee camps. As the fighting shifts from place to place, great surges of people are set on the move again, trying to get away. The United States Omega marine navigation beacon, had twenty thousand people on its compound until the night the fighting came near; by morning all were gone -- to the Voice of America transmitter site, or Fendell University Campus. Some ended up at the protestant mission known as Elwa, after the call sign of its radio station, ELWA. By the time the war got to them there were 22,000 people at Elwa and the missionaries had given up broadcasting in favour of running a refugee camp. But ten days ago the bullets began to fly around the compound, and rebels told them they believed the government troops were bringing up artillery. People began streaming out of the gates. Within two hours all twenty two thousand were gone, joining the endless procession of Liberians tramping the roads, all they have left wrapped up in a couple of cloth bundles.

With the latest news from Liberia talking about the rebels starting to fight among themselves, the refugees may not see their homes again for many months to come.

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EXHIBIT G

24 Hrs. ECOWAS Force Feature

From small beginnings at the end of last year, the war in Liberia has spread to ~~affect~~ the ~~entire~~ ^{entire} country and ~~even other~~ has begun to spill ~~over~~ ^{after} to affect the whole ^{West African} region. Chadians ^{who} ~~have~~ managed to get back to Accra, told stories of the terror and brutality inflicted by Liberian soldiers; rebels bent on tribal reprisals, pursued their victims even on the other side of the Guinea border. Now stories are emerging of Nigerians killed ~~after~~ ^{after} having taken refuge with many thousands of others at ~~the~~ a temporary camp. Reports of massacres in churches and streets littered with unburied bodies have now pushed other West African leaders to talk of acts "contrary to all recognized standards of civilized behaviour" and, start making plans for a military intervention. After two days of ~~int~~ ^{or African} planning & discussion, ^{the} Secretary General of the ~~regional~~ ^{body} ~~EC~~ West African Economic Community ECOWAS, announced what-form it was going to take.

ROUNDU.

^{to} ~~the~~ West African heads of State appealed ~~for~~ ^{for} a ~~ceasefire~~ to all the warring parties

for an immediate ceasefire, but if the combatants don't stop shooting, will the ECOWAS contingent go ahead & impose a ceasefire by force. The Chairman of the meeting, President Jawara of the Gambia, was conciliatory but vague.

JAWARA.

If they do manage to stabilise the situation, what next? The ECOWAS plan envisages a national conference to set up an interim government, and elections 12 months later. The interim government as Dr Abbas Bundu explained would have to be above politics.

BUNDU 2.

The great question now is whether the warring factions will accept this. In particular Charles Taylor who has fought a long battle which has brought him to the very edge of victory may not be ~~very~~ happy to be excluded from the interim government & made to fight an election to get what he has so nearly captured by force of arms.

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EXHIBIT H

Elizabeth Blunt

Banjul

6.8.90.

N 420 Liberia: ECOWAS meeting opens

CUE: West African heads of state have begun a meeting in the Gambian capital, Banjul, to try to agree on joint action to end the civil war in Liberia. The Gambian President, Sir Dawda Jawara, opening the session, said that Liberia had become a slaughterhouse and the world was looking to Liberia's neighbours for a solution. West Africa correspondent Elizabeth Blunt reports:-

The Banjul meeting opened with a powerful call from the host, President Jawara, to his colleagues to take on the responsibility of trying to resolve the Liberian conflict, which, he said, had gone beyond what could be considered an internal matter:

ACT: We had all along...

.....deteriorate further.

(Liberia, he said, had become a slaughterhouse, and its neighbours could not afford to let the situation deteriorate further.)

The countries concerned in the meeting are clearly taking it seriously; the leaders of Nigeria, Ghana, Sierra Leone and Guinea have all come in person. They and their advisors have already laid plans for the creation of a West African intervention force, mostly Nigerian but with components from the other three countries. They would ideally like to send it as a peacekeeping force after getting the agreement of all three warring parties to a ceasefire, but members of some of the delegations are suggesting that the consent of President Doe, and one of the two rebel leaders might be enough.

Yesterday's intervention by United States marines does not seem to have affected the West African plan, limited as it seems to have been to evacuating American citizens. The West African leaders also want to evacuate their citizens, but have they ambitions to go further, and create conditions for Liberians to resolve their
conflict.