

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

I, Jane W, declare under 28 U.S.C. § 1746 that:

I. Personal Background

1. I am a Plaintiff in this case. I am the representative for my late husband and daughters' estates.

2. I was born on [REDACTED], in [REDACTED], Nimba, Liberia. I am from the Gio tribe, which is also known as the Dan tribe.

3. I live in [REDACTED]. I am a [REDACTED] and I sell [REDACTED].

4. Before the war broke out, I lived in the [REDACTED] neighborhood of Monrovia with my husband, James W, and our three daughters. My husband was a [REDACTED], and he [REDACTED].

5. My husband, two of my daughters, and my aunt were killed during the massacre at St. Peter's Lutheran Church on July 29, 1990 (the "**Lutheran Church Massacre**"). My two daughters, Julie W and Jen W, were 16 and 9 years old when they were killed. My surviving daughter was not with us at St. Peter's Lutheran Church (the "**Lutheran Church**" or "**Church**") the night the massacre happened.

6. Of my family, one daughter, three of my paternal sisters, and one of my paternal brothers survived the war.

II. Before the Lutheran Church Massacre

7. When the war broke out in 1990, I was living in [REDACTED], Monrovia. At that time, soldiers from the government forces—that is, the Armed Forces of Liberia—went from house to house at night, killing people in their homes. My family and I lived in constant fear. We could hear people crying in their houses as they were attacked, and we felt very unsafe. I could tell that the soldiers attacking were from the government forces because I saw their

camouflage uniforms. Some of my neighbors fled, only to return because they had no other options. My family and I were unsure where we could find protection from the violence.

8. One day, a group of government soldiers came to my neighborhood, [REDACTED], and called civilians out of their houses, claiming that they were selling farinoh, a traditional Liberian food made from cassava. I was with my friend when her daughter ran up to us, crying. She told us that the soldiers had arrested a group of civilians—including her father, [REDACTED], who was from Nimba—and took them away. Some of my neighbors, who were from the Bassa tribe, followed the soldiers to find out what would happen to the people that were arrested. I was too scared to accompany them because I was from Nimba. Because my husband spoke some Krahn, he felt comfortable following the soldiers for part of the way, but he grew frightened and turned back. When my neighbors returned, they told us that the soldiers had [REDACTED] [REDACTED]. That day, my husband and I decided we had to flee with our family.

9. My husband suggested that we go to the Lutheran Church. He believed that the government soldiers would not kill people there, because the Church was a place of worship. None of us thought that soldiers would go to a church and kill civilians there. In mid-July 1990, my husband and I, along with two of our daughters, Julie W and Jen W, went to the Church. Our third daughter did not join us; she went with her friends to the American Embassy, and then to the John F. Kennedy Hospital.

10. When we arrived at the Church, I saw my aunt, who had also come to the Church for safety from [REDACTED]. She burst into tears. She told me that she learned from her neighbors that the government soldiers from the Special Anti-Terrorist Unit (“SATU”) had arrested a group of men, including my aunt’s brother, my uncle, and then butchered him. So she fled for her life.

11. The Church was next to a school, and the two buildings shared a yard. There was a fence that went all around the compound. When we arrived, the Church and the school were jam-packed with people—I could not possibly count how many were there. Most people in Monrovia and at the Church, including me and my family, spoke in English instead of our tribal dialect. We were scared that the government soldiers would target us if they heard us speaking in the Dan (Gio) dialect and realized we were from Nimba. A group of men volunteered to stand guard outside of the Church to watch for danger, but they did not have any arms or other materials to defend themselves.

12. During the day, I would walk around the yard of the Church compound, but I never went beyond the fence. There was an evening curfew in place and nobody could go outside at night. Those who were lucky enough to have seeds or cassava and coconut would eat and feed their children in the evenings. But my family never had enough food—by the time we arrived at the Church, all of the United Nations rations had been distributed. My husband, daughters, and I found a spot for our family in the back of the Church, near the doors and against a wall, where we stored our belongings and slept at night. My aunt slept in the school building.

13. About one week after my family and I arrived at the Church, government soldiers came to the compound. That afternoon, the Church was packed with people, and I was sitting in our family's spot. I could see out of the windows and the front doors that a large group of soldiers surrounded the Church. They wore what I recognized as the government camouflage fatigues and combat helmets. They had insignia on their uniforms, including bird and palm tree symbols, the Liberian flag, and stars that showed their rank. I knew the stars indicated a soldier's rank because I had heard about "two-star generals" and "three-star generals."

14. As the soldiers surrounded the Church, some people tried to leave the compound because they were afraid of the armed men. I was scared too, but I stayed in my place. It seemed like there were a hundred of them surrounding us. I heard the soldiers tell the people outside to calm down, and that they were there to guard us. They ordered the civilians not to leave.

15. I saw one of the soldiers, a man of big build, talking to the crowd outside. I saw that he had an olive-green army hat and insignia on his uniform. The big man told a group outside to sit down, and that he could protect them. He walked over to the school building, but I could not hear what he said. I watched as the big man left the compound about twenty minutes later, and the other soldiers followed him.

16. After they left, a man in the Church told me that the big man was Moses Thomas, the head of the SATU. He said that the SATU were killing a lot of people. When I learned that information, I committed that man's face to my memory. Some of the people in the Church felt very unsafe after the soldiers visited, and they left the compound to find refuge in another place. I told my husband what the man had told me about SATU, and I said that we should also leave, but my husband assured me that we were in God's house—no one would kill us there.

17. Attached to this Declaration as **Exhibit A** is a copy of a photo line-up I was shown by Nushin Sarkarati from the Center for Justice and Accountability on May 13, 2017. The individual I have marked is the "big man" who I saw at the Lutheran Church.

IV. The Lutheran Church Massacre

18. One night, about three days after the soldiers came to the Church, on July 29, 1990, a group of government soldiers returned to the church compound. They came at night when people were sleeping.

19. I was in our spot in the back of the Church with my husband and children, with a few people separating us. My aunt was sleeping in the school building. I was wide awake. I could never sleep at night out of fear. I heard the sound of boots on the ground outside of the Church, and I asked myself, what is happening? Suddenly, government soldiers entered the Church and started shooting. As the soldiers began shooting, the people inside of the Church started running.

20. I saw bullets flying everywhere, streaming in from the doors and from outside, through the windows. Some soldiers shot at the bodies of people sleeping on the ground. I hid under the bodies of people who had already been shot. I felt others fall on top of me as they were killed. I lay still, face-down among the dead and in their blood, for the remainder of the attack. I was too scared to look up. I survived because the soldiers could not see me under the pile of bodies—they could not see that I was still alive.

21. I waited on the floor, under the fallen bodies and soaked in others' blood, until the soldiers had all left. As daylight was just coming in, I stood up and saw corpses covering the floor and blood everywhere. There were so many bodies that there was no space between them—I could hardly see the floor. I did not see any other survivors.

22. I walked outside of the Church, and I saw bodies of people who had tried to escape but were shot once they made it outside, as they were running away. I was confused, and I could not bear to stay at the Church to look for the remains of my family members.

V. After the Lutheran Church Massacre

23. After I left the Lutheran Church, I crossed the bridge over the Mesurado River. I thought about throwing myself into the water below, but God spoke to me in that moment of despair and stopped me from ending my own life. I kept walking along the road for a while until

I reached the area of Mount Barclay near the Fendell Campus of the University of Liberia, about 14 miles outside of Monrovia.

24. I saw rebel soldiers from the National Patriotic Front of Liberia (“NPFL”) at Fendell Campus. They were dressed in a funny way, in street clothes and with a red cloth tied around their heads. Some of them wore women’s wigs. They gave me some food, and I rested there for one month and three weeks, hoping that I would see my husband and children among the people who also came to the area. But I became worried that the government forces might attack the location, so I left to continue on to Nimba.

25. I walked along the road for over a month. Along the way, I saw child soldiers from the NPFL arresting government soldiers walking on the road, who were identifiable by their military boots. I was usually not scared of being targeted by the NPFL who were on foot, because they could tell that I was a civilian, but I would jump into the bush whenever I heard NPFL soldiers coming in cars. I had learned from other civilians that the NPFL soldiers who were in cars were more dangerous than the ones who were walking on the road, because they would shoot at civilians from their vehicles. Because of this, we understood that when there were vehicle sounds, we should run and hide. On one occasion, I heard vehicles coming so I jumped into the bush and I badly injured my leg. The whole bone came out and I had trouble walking the rest of the way. I eventually reached Nimba and I stayed there. The entire journey from Monrovia to Nimba took me three months. In Nimba, I had to go to the hospital for treatment for my leg.

26. When I first arrived home after the Massacre, one of my relatives told me that my aunt had been killed in the Massacre. I still do not know how my husband and daughters were

killed, but I heard from someone who buried the bodies at the Church that they saw their bodies there after the Massacre. I don't know what happened to my aunt's body.

27. About one year later, in 1991, I found my one surviving daughter in [REDACTED] in Nimba County. I did not return to Monrovia until after the civil wars had ended. I traveled back and forth from Nimba to Monrovia to [REDACTED] in the capital.

28. In the aftermath of the wars, I heard about the Truth and Reconciliation Commission (the "TRC") from people who traveled between Nimba and Monrovia [REDACTED]. But I did not contact the TRC, and nobody from the TRC approached me directly to testify. I do not know anyone personally who testified before the TRC. The TRC process was secretive and unclear, and I was afraid the perpetrators would retaliate against me and my family. My father told me that he feared I would be killed if I shared my story. According to friends who would go between the Ivory Coast and Liberia [REDACTED], even Liberians who crossed over to the Ivory Coast and shared their stories were harmed after speaking up.

29. I also could not afford to hire a lawyer to advocate for me. In Liberia, without money, there is not even the possibility of justice. The perpetrators can escape accountability because they had money. The victims, meanwhile, have not been organized until recently.

30. Because of all of these obstacles, everybody knows that the Lutheran Church Massacre happened, but there has been no accountability. The people responsible for the Lutheran Church Massacre remain free.

31. I only learned a few years ago, before I met the people working on this case, from a friend in [REDACTED] that the people responsible for the massacre were in the United States. I could not believe that the people responsible for so much pain were simply enjoying their lives in America. The night my friend told me about this, I had a dream that there would be justice.

32. The events of the Massacre have impacted me physically and emotionally. I still have a lot of pain in my leg from when I broke it as I fled Monrovia for Nimba. I also feel a severe pain in my heart at night that keeps me from sleeping when I think about my husband and children, and I start to feel like I am going out of my mind. This pain is unimaginable, and it is very hard for me to talk about what happened, even to this day.

* * *

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 February 3, 2021, in [REDACTED] Liberia.

Jane W

[REDACTED]

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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;

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EXHIBIT A



13 - May - 2017

