

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

I, William X, declare under 28 U.S.C. § 1746 that:

I. Personal Background

1. I am a Liberian citizen and currently live in [REDACTED]. I was born on [REDACTED], [REDACTED] in [REDACTED], Liberia.

2. When the war broke out in 1989, I lived in the [REDACTED] of Monrovia near the airfield. I was a member of the St. Peter's Lutheran Church ("**Lutheran Church**") congregation at that time.

II. The Refugee Center at the Lutheran Church

3. In 1990, Charles Taylor, the leader of National Patriotic Front of Liberia ("**NPFL**"), and his forces entered Nimba. Violence between the NPFL and Armed Forces of Liberia ("**AFL**"), led by then-President Samuel Doe, began to increase. The battlefield then moved closer and closer to Monrovia.

4. In May 1990, the United Nations Development Programme Compound was attacked. Many civilians who were residing there as refugees were displaced. Bishop Ronald J. Diggs, the leader of the Lutheran Church of Liberia, invited the refugees to stay at the Lutheran Church.

5. Bishop Ronald Diggs helped turn the Church from primarily a place for religion into a humanitarian and refugee center. The church was meant to be a safe place for those displaced from the war. Bishop Diggs organized the distribution of food to those sheltering at the church, and set up a small school for children.

6. The Lutheran Church compound consisted of the main church building with a school building attached. Attached to this Declaration as Exhibit A is a diagram of the church compound.

7. There were banners with the emblem of the Red Cross Organization, a red cross with arms of equal length on a white background, placed on the four corners and at the entrance of the Lutheran Church. There was also a United Nations flag.

8. I continued to go to the Lutheran Church for religious services and helped as a volunteer. I began by distributing food to the people staying there. We would cook meals at the Lutheran Church and draw water from the well that was located at the compound. We cooked a big meal once a day, and then would serve meals to the refugees in the school building on the compound. We stored food supplies in one of the classrooms.

9. As refugees entered the church, I and the other volunteers also registered them and took down their information, including their name, where they came from, and their tribe. We also recorded the names of any children they brought with them into the compound.

10. At first, there were about 600 people staying at the church. But more and more people started coming throughout May and June in 1990. The numbers increased in these months as the war intensified, and more and more people needed to seek refuge. The first group of people who came to the Lutheran Church came from the Guinea Embassy; Bishop Diggs and other bishops took people seeking shelter at the embassy and brought them to the church. Soldiers were threatening refugees at the Guinean Embassy, and they no longer felt safe there. The Lutheran church had a taller fence, and that made people believe that the Church could be a safer space than other compounds with lower fences.

11. While the Lutheran Church became the main location for helping the displaced people, there soon wasn't enough space at the Church for everyone fleeing the violence. Bishop Ronald Diggs worked with the Red Cross and established additional centers to house the refugees, including at the Don Bosco School, the J.J. Roberts School, the nearby Providence Baptist Church and the Methodist Church.

12. Between May 1990 and July 1990 there were at least 1,300 people staying at the Lutheran Church itself. The majority of the people who were refugees at the Lutheran Church were Mano or Gio. There were many families at the church, including the elderly, women, and children. None of them had weapons and they all wore civilian clothes.

13. Many of the refugees slept on the main level and the upstairs level in both the main church building and the school building. During that time, between May and July 1990, I would often sleep at the church as well.

14. There were many volunteers as well. The volunteers were church members, like me. We trained people at the Church to rotate as security guards and serve as a lookout. There were two entrances to the Church compound. Five people were stationed at the front, and five other people were stationed at the back. But these guards did not have any weapons.

15. During the time the Church was housing refugees, we continued to hold services on Sundays for the congregation.

III. The Attack on the Lutheran Bishop's Compound

16. On July 29, 1990, before the Sunday Service, a group of AFL soldiers in military uniforms passed in front of the church and pointed at it. I did not speak to them, but their actions and their pointing at the church made me worry that the soldiers would come to the church and harm us. I was afraid the soldiers would attack because most people sheltering at the church were Mano and Gio, and AFL soldiers—who were mostly Krahn at that time—were targeting Manos and Gios. I decided not to sleep at the church that night as I was worried it was no longer safe.

17. After the soldiers passed by the church, I carried the congregation's monetary offerings (approximately \$7.50 USD) to the Bishop's compound. The Bishop's compound was located about two blocks away from the Lutheran Church.

18. As I left the Bishop's office, I saw soldiers enter the compound. I recognized one of the soldiers as Michael Tilley. He lived nearby me in [REDACTED] and I had seen him before. I went straight home and remained there for the remainder of the day. Pastor Allison and my cousin were inside the Bishop's compound when the soldiers entered. They had been detained and later released by the soldiers, and my cousin brought Pastor Allison to my home to seek refuge. We decided to remain at my home for the rest of the night and hide.

IV. The Lutheran Church Massacre

19. I learned the next morning that the AFL soldiers had invaded the Lutheran Church compound on the night of July 29. I learned this from a woman who had escaped the massacre. She fled the Lutheran Church compound and ran to my house. She arrived at my house sometime between 7:00 a.m. or 8:00 a.m. on July 30, 1990 and told me what had happened.

20. I wanted to return to the Lutheran Church after I learned of the massacre but I was too fearful. I heard on the radio that soldiers were preventing Red Cross workers from taking the wounded to hospitals. After hearing that, I was too afraid to go to the church and I remained in my house.

V. After the Lutheran Church Massacre

21. The violence had come to Monrovia and it was too dangerous with the constant conflict between AFL soldiers led by President Samuel Doe and the NPFL forces led by Charles Taylor.

22. I finally returned to the Lutheran Church in October 1990 with other members of the community and the congregation, including Bishop Ronald Diggs, after a temporary ceasefire was declared following the death of President Samuel Doe. We wanted to clean up the aftermath of the massacre and fumigate the Lutheran Church.

23. When we entered the church, we saw bodies and skeletons everywhere—all at various stages of decay. There were bodies in the parsonage, in the school building, in the church building, and in the yard. There were even bodies lying out in the open behind the Lutheran Church near the street.

24. The pews had been looted and there were bullet marks on the roof and the windows. All the provisions, including the food stored in the classrooms, had been taken. The book that we had used to register all the refugees, which we stored in a cupboard, was no longer there and I have not seen it since July 1990.

25. We decided we had to bury the victims. It took us about a month to clean up the church and bury the bodies. At first there were only twelve of us working together, but our numbers grew. By the time we finished, there were approximately twenty-five people in total.

26. We asked some volunteers to keep guard at the gates while we cleaned up and moved the bodies. I raked the bodies together while the younger volunteers dug the graves. None of the deceased were soldiers. There were no weapons found near the bodies during our cleanup efforts and we didn't find any military uniforms.

27. In total we dug six mass graves on the church compound to bury most of the bodies. Two of the graves are marked with stars and a plaque identifying the church attack. Attached to this Declaration as Exhibit B is a photograph of one of the grave markers.

28. I believe we buried at least 400 people. We couldn't bury every victim and had to dispose of some remains in the garbage.

29. We continued to fix and renovate the Lutheran Church so we could hold services and worship there again. During the renovation, the Bishop held services at the Bishop's compound.

30. We had to clean and replace the roof, which leaked due to the holes left by the gunshots during the massacre. We removed the barbed wire from the fence. We purchased new pews and installed new doors.

31. In November 1991, the congregation started worshiping at the Lutheran Church again.

32. Every year on July 29, we hold a memorial service to honor those who were killed at the church. This event harmed us deeply because many members of the congregation lost family members in the attack.

* * *

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.

FEBRUARY 1, 2020
Executed on February 1, 2020, in [REDACTED], Liberia.

[REDACTED]

[REDACTED]

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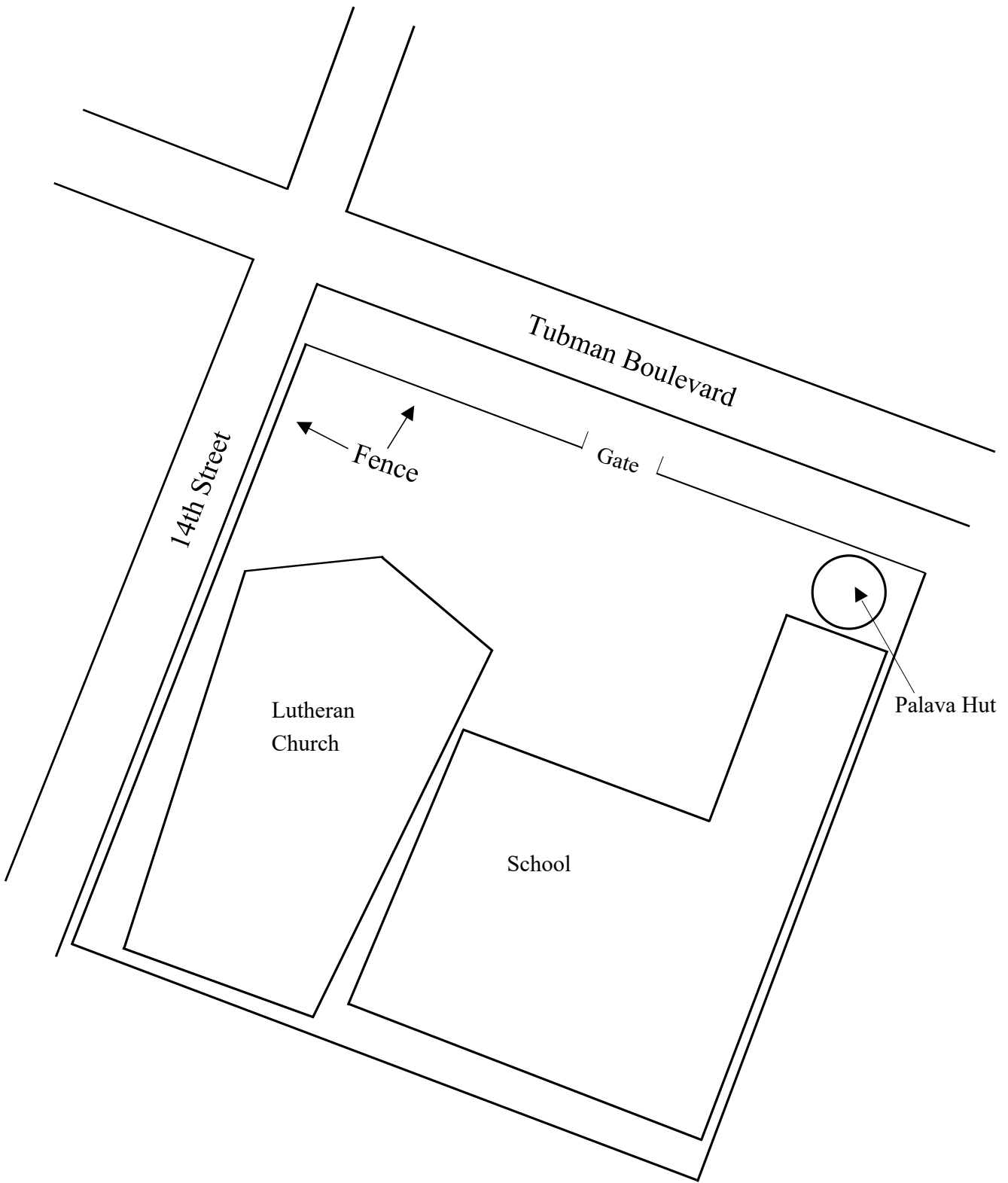
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EXHIBIT A



North

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EXHIBIT B

