

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

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

## **I. Personal Background**

1. I was born in Lofa county, Liberia in [REDACTED]. I am from the Loma tribe.
2. I joined the Armed Forces of Liberia (“AFL”) in [REDACTED] and retired in [REDACTED] as a [REDACTED]. I currently work as a [REDACTED] for [REDACTED].
3. I joined the AFL in Monrovia and finished my training in [REDACTED]. I was first stationed in [REDACTED] as a private and worked [REDACTED]. Then I went to [REDACTED] where I worked as a [REDACTED]. On [REDACTED], 1990, I was sent to Monrovia to be a [REDACTED] by the beachside of [REDACTED].
4. In my training, I was taught [REDACTED] and how to protect the lives of the civilians around us. I learned about the Geneva Conventions and how to tell the difference between civilians and fighters. I also knew about rules of engagement, but my station was far from the fighting on the frontline.

## **II. Experience with the Special Anti Terrorist Unit**

5. When I was stationed in Monrovia, I sometimes saw members of the Special Anti-Terrorist Unit (“SATU”) when they were at the Executive Mansion. SATU was a specialized unit within the AFL. They were easy to recognize because their uniform was different from the regular infantry. In addition to the usual camouflage fatigue that all AFL soldiers wore, the SATU soldiers had red berets, a red tab near the neck, and the SATU badge on their left arms. Sometimes they wore combat helmets too. SATU’s role was to protect the President of Liberia. They reported directly to the President, so I saw them near the Executive Mansion a few times and would sometimes pass them while on assignment.

6. I knew Colonel Moses Thomas was the SATU commander and saw him on [REDACTED], 1990. That day, the commanders assembled all the troops together for a muster, which is a gathering where all the troops get in formation and listen to the commanders. Moses Thomas was there as the SATU commander along with some other commanders, including Colonel Wright, the infantry commander. Part of why they had us muster was to give us assignments, and I was assigned to [REDACTED].

### **III. Visiting the Lutheran Church**

7. In late July 1990, the fighting intensified between the AFL and the rebels and reached the [REDACTED]. On July 20, 1990, my family had to flee the area. Most of them went to [REDACTED], except for my sister [REDACTED] who took shelter at the Red Cross refugee site at the St. Peter's Lutheran Church (the "**Lutheran Church**").

8. I was able to visit my sister at the Lutheran Church on July [REDACTED], 1990 to bring her some food. The Red Cross workers didn't allow weapons inside the church, so I had to leave my weapon outside before I went in. Inside, the church was packed with all sorts of displaced people, all of them civilians in plain clothing. People thought the Lutheran Church was a safe place to go if you were fleeing the fighting, because it was a church and the bishop was staying nearby. During the war, many people hid in church compounds assuming they were safe. The Lutheran Church also had a Red Cross banner and Red Cross workers so it seemed particularly safe. I was trained by the AFL to recognize the Red Cross symbol, which meant that we had to protect that location because people were there for treatment or protection.

9. I gave my sister the food I had brought her and visited with her for a while, but I had to go back to my assignment.

#### **IV. The Lutheran Church Massacre**

10. On the night of July 29, 1990, I was [REDACTED] stationed at the beach [REDACTED].

11. At some point during the night, [REDACTED] we heard the sound of gunfire coming from the Lutheran Church [REDACTED] blocks away. Because we were trained to protect civilians and I knew the Lutheran Church was filled with civilians, I [REDACTED] [REDACTED] ran toward the sound of gunfire.

12. When I got to the church, I saw a lot of men, all of them SATU with the signature SATU red on their uniforms. Some were wearing red berets and others had combat helmets. They carried M16 assault rifles, Uzi submachine guns, and other automatic weapons. A few tactical jeeps were outside. These jeeps were generally used by SATU more often than other AFL units, and were often used by commanding officers.

13. The shooting was still going on when I got there. I could hear it inside the church and could see the SATU soldiers shooting at the civilians. None of the civilians had any weapons that I could see. It didn't seem like the SATU soldiers were fighting anyone, just shooting unarmed civilians. I didn't see anyone return fire from inside the church.

14. I was only at the Lutheran Church for a few minutes before I saw Colonel Moses Thomas standing by the flag pole inside the fence of the church compound. He was wearing camouflage fatigues and a red cap, and he was holding a .45 pistol in his hand. Only AFL senior officers could use pistols. Thomas was the only commander that I could see—and I only saw

SATU troops around us—so I went toward him. I knew it was him because I recognized him from the muster. I could also see his name tab. It was a black tab with white writing that had his name and his rank of Colonel. When I was about two feet away, he saw me. He said that I was abandoning my post at the beach and ordered me to go back to my patrol.

15. Moses Thomas is a Colonel, so I had to obey his orders even though I really wanted to stay and check on my sister. Due to his superior rank as colonel, Thomas had the authority to command other AFL soldiers, even those from other units. I was afraid that if I disobeyed his orders, I would have been shot or put in jail.

16. Attached to this Declaration as Exhibit A is a copy of the photo line-up I was shown by Elizabeth Nielsen on September 28, 2019. The individual I have marked in Exhibit A is the Colonel I recognized at the Lutheran church on the night of the attack, Moses Thomas.

17. I went back to [REDACTED] the beach [REDACTED] [REDACTED] until our shift was over the next morning. In the morning, I went back to the Lutheran Church. One of my friends, [REDACTED], came with me. The church was covered with the bodies of hundreds of men, women, and children. All of the bodies looked like civilians, and there were no weapons among them. I also never heard anything about any weapons being taken from the church.

18. My friend called me over because he saw my little sister lying dead among the bodies near the compound gate. He recognized her because much earlier we had gone to have meals at my house and he had become friends with my sister too. She had been shot and there was a trail of blood behind her. It looked like she had tried to crawl towards an escape while badly injured.

## V. After the Lutheran Church Massacre

19. I sent a message to my older brother, who came with some other relatives to bury our sister. I'm not sure exactly when because by then I'd decided to flee Monrovia. Once I heard on the radio a report from the BBC reporter Elizabeth Blunt that SATU had attacked the Lutheran Church, I knew I had to leave. This happened in the afternoon at about 5:05 p.m. on July 30. I was worried that SATU would learn that they had killed my sister and I wouldn't be safe in the AFL anymore. I was concerned the army would think I might react badly and decide it was safer to kill me as well.

20. From the Lutheran Church, I went back to my barracks at the Barclay Training Center. When I passed by the Executive Mansion, I heard the sound of celebrating. I could hear someone shout, "We got rid of those dogs last night." When I got closer, I could see that it was many men—all in SATU uniforms with the signature SATU red. They were drinking and celebrating.

21. I got a ride in a pickup truck to [REDACTED] and then to [REDACTED] county. Then I crossed the border into [REDACTED] on [REDACTED], 1990. Later I went to [REDACTED] where I lived as a refugee while the fighting continued until [REDACTED].

22. I then returned to Liberia and re-enlisted in the AFL. I continued to serve in the AFL until I retired [REDACTED].

23. When I look back at the Lutheran Church Massacre, all I can think about is how my sister was violently killed and taken from me too soon. She was already dead when I got there, so I could never say goodbye. It really bothers me whenever I think about how she was murdered in that manner. Her death has had a real impact on my life.

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 January 26, 2021, in [REDACTED], Liberia.

[REDACTED]

[REDACTED]

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**EXHIBIT A**





sept. 28-2019  
-1:35 pm