

## STATEMENT OF [REDACTED]

I, [REDACTED], a United States and Liberian citizen, of [REDACTED]  
[REDACTED], do hereby make oath and state as follows:

**I. Personal Background**

1. I am a Plaintiff in this case. I advance claims in my personal capacity and on behalf of my family members who were also victims of the massacre at St. Peter's Lutheran Church in Monrovia, Liberia, on 29 July 1990.

2. I was born in [REDACTED], Liberia. My family belongs to the Kpelle, Mano, and Bassa tribes.

3. I am a Liberian and an American citizen.

4. I lived in Liberia until I was 16 years old and was a refugee in the Ivory Coast until I moved to the United States of America, where I currently live.

5. My mother, [REDACTED], and brother, [REDACTED] were killed during the massacre at St. Peter's Lutheran Church on 29 July 1990 (the "**Lutheran Church Massacre**"). My mother was in her mid to late 40s when she was killed and my brother [REDACTED] was 9 or 10. Approximately 14 other relatives from my extended family were also killed during the Lutheran Church Massacre, including my cousins [REDACTED], who was 15 years old, and [REDACTED], who was around 18 years old.

6. I am a survivor of the Lutheran Church Massacre. I was 16 years old at the time of the attack. Approximately 10 members of my family survived the attack, including myself, and my sisters [REDACTED].

7. My sister [REDACTED] is also a Plaintiff in this case. She is a dual citizen of Liberia and the United States of America, [REDACTED]. She is my older sister. After the Massacre, [REDACTED] fled to the Ivory Coast, where she remained until 2003, when she was granted asylum in the United States.

8. My eldest sister [REDACTED] is also a Plaintiff in this case. She is a dual citizen of Liberia and the United States of America, [REDACTED]. At the time of the Lutheran Church Massacre, [REDACTED] was residing in the U.S. and lost contact with my mother and the members of our family who were in Liberia just before the Massacre. She had no news of our family's whereabouts until around 1991 when she was finally able to locate me, and later my other siblings, and help bring us to the United States.

## **II. Start of the Liberian Civil War**

9. I grew up in [REDACTED] and lived there until I was about 11 years old. My mother raised me along with 16 other siblings. She took in other children from my extended family and beyond and raised them as if they were her own children. I am not sure how many of my siblings were my biological siblings, how many were from my extended family, and how many were not related to me by blood, as we were all raised together as siblings. The siblings I was closest to were my older cousin [REDACTED], who I believed was my brother when we were growing up, my younger brother [REDACTED], and my older sisters [REDACTED].

10. In 1985, when I was in fifth grade, I moved to Monrovia and lived with my older sister [REDACTED] so that I could finish my schooling in the capital. My mother valued education and wanted me and my siblings to complete our studies and attend college. My mother moved [REDACTED] to Monrovia in early 1986 so that she could watch over her children. She was very

religious and wanted to make sure we would not be subjected to what she viewed as the corrupting influences in the capital. Later in 1986, my mother moved to the United States, where my older sister [REDACTED] was living and working. But my mother returned to Monrovia in 1988 to be closer to her younger children. While she lived in Monrovia, my mother kept the family rice farm [REDACTED], where her cousins and other relatives worked. My mother would travel back and forth between [REDACTED] and Monrovia to sell her rice, using the proceeds to purchase vegetables and other necessities.

11. When the First Liberian Civil War broke out in December 1989, I was in [REDACTED]. School was closed for a few months beginning in December, and [REDACTED] and I went back to our village for Christmas and the break, staying with relatives there. I was really excited to go back because my mother did not allow me to visit the year before, saying I was too young to go without her. [REDACTED] [REDACTED] I remember listening to BBC Focus on Africa on the radio and hearing Chris Bickerton report that there had been a rebel incursion in Liberia. I believe this was around Christmas day or the day after, and I remember everyone gathered around the radio, shocked to hear the news.

12. A couple of days later, a truck full of soldiers from the Armed Forces of Liberia (AFL) came to Yila. There were about 10 to 15 soldiers who came, all in the back of a big truck. When they came, everyone from the village gathered around and watched, including myself, as it was a big deal for the military to come [REDACTED]. All the soldiers were dressed in military uniforms and carried guns. I recognized their uniforms because I began participating in the Reserve Officers' Training Corps (ROTC) in middle school, as was required of all students in Liberia beginning in middle school. The soldiers said there was a real war going on in Nimba,

██████████. The soldiers then asked for food, and the town chief offered some goats and maybe cattle too. The soldiers threatened to carry out arrests if they did not get what they asked for. But some soldiers knew people ██████████, which helped to bring the tension down. The soldiers left without making arrests but took more animals than the town chief had offered.

13. In early January 1990, ██████████—the brother of the pastor ██████████ who had a pickup truck and traveled between ██████████ and Monrovia—arrived with a message from my mother that ██████████ and I were to return to Monrovia ██████████. I think my mother was worried about the war, and she wanted us closer to her. Although I was a reluctant to leave ██████████ before the end of my vacation, I was somewhat relieved to return to Monrovia and be with my family, because I had heard rumors of Manos and Gio people being killed and was concerned about the war.

14. The drive back to Monrovia took about six or seven hours. We had to pass through multiple checkpoints staffed by AFL soldiers, including at Gbarnga, Kakata, Gate 15, and near the Firestone Plantation. The checkpoints existed before the war broke out, but they were staffed by police and were less intense at that time. When we passed through the checkpoints in January, the soldiers asked for national identification cards, which listed each person's place of birth and tribe. I did not have a card because I was still a child. Gate 15 and Firestone were two of the worst checkpoints. At Gate 15, the soldiers ordered everyone out of their cars, checked identification cards one by one, and searched all bags. We were able to pass through the checkpoints because ██████████ gave the AFL soldiers some money and told them that ██████████ and I were his children.

15. When I returned to Monrovia, I stayed with my family in [REDACTED], and I started 10th grade [REDACTED] around March. The first time I can recall the fighting reaching Monrovia was around late May 1990. I was at school when gossip circulated around campus that AFL soldiers had broken into a United Nations (UN) compound in Congo Town and killed people. Two of my friends and I decided to leave school and go to the UN compound to see what had happened. When we got there, I saw a massive pool of blood, which a UN worker was trying to clean with a hose. People were gossiping in Mano, saying that it was Manos and Gios who were killed, and the AFL was responsible. A man told the crowd to push the kids away, that everyone should leave, and that the Liberian police were on their way. This massacre opened my eyes to the atrocities happening in the Civil War, and the memory of it has stuck with me for decades. I knew about the UN and believed it was powerful, so it was shocking to me that people were killed on a UN compound. The massacre was the first time I realized that the war developing in Nimba would reach Monrovia.

16. A few days after the attack on the UN compound, President Samuel Doe visited my high school, dressed in military fatigues. He said that the rebels had passed Gbarnga and Kakata, and he painted a very dark picture of the war. A couple days after that, rumors spread through Monrovia that the rebels had reached Paynesville. Everyone was running through the streets, very worried. I ran home from school, but when I got home and listened to the news, I learned that the rumors were false. My school closed not long after that, around early June 1990, because the situation was worsening in Monrovia.

17. As the war approached Monrovia, the city was gradually turning into a ghost town. Those who were educated, had money, and knew what was happening across the

country were starting to cross the borders and flee into Guinea, Sierra Leone, and the Ivory Coast. Some even began flying out to Nigeria and Ghana. The streets and neighborhoods became more desolate. Even though I was still young, I could tell things were no longer the same in Monrovia. There were rumors throughout Monrovia and on BBC's radio shows that the AFL was out of control—killing, looting, and raping, and targeting Mano and Gio people. Because of this, I knew it was safer to stay indoors, avoid soldiers, and not identify as Mano.

### III. Moving to the Lutheran Church

18. Around early June 1990, I was playing soccer with [REDACTED] and our friends when one of them yelled that soldiers were coming. [REDACTED] and I had our backs turned to the soldiers trying to score a goal, so we did not see them approaching and did not have time to slip away. Everyone else was able to run away. There were about four or five soldiers in the group, all holding rifles with large magazines. They were wearing AFL uniforms, which were worn and dirty, and they had badges showing their ranks. I believe the officer leading the group was a sergeant, and the other soldiers were private first class. The officer asked us where we were from, and I responded in the Kpelle language that I was from Zowenta, Kokoya district. Zowenta is near [REDACTED], and I did not want to answer [REDACTED] because there is a large Mano population [REDACTED], whereas Zowenta is mostly Kpelle. The officer asked me who I knew from Zowenta. I think he wanted to make sure I really spoke Kpelle and was really from Zowenta. I gave the name of the Paramount Chief, and that seemed to convince him that I was telling the truth. The officer then asked me where I lived and told me they would pick me up after dark so I could help identify the homes of wealthy Liberians for the soldiers to loot. I pointed to the house of a Senator and said I lived there, as I knew that the AFL would not cause him any trouble. The soldiers then let

us go, and we pretended to walk to the Senator's house before taking a back road home, to avoid running into more soldiers.

19. My mother was very worried after this interaction. I believe this was a turning point for her, as she saw the danger her children could face with the war approaching Monrovia. Because I spoke Bassa, Kpelle, and Mano, she knew it would be difficult to tie me down to a single ethnic group, and so I may be less of a target. However, most of my other siblings and relatives only spoke one language. For them, it would be much harder to pass for a safe tribe.

20. Maybe a day or two after my encounter with the soldiers, my uncle [REDACTED], who acted as the head of our household, came to our house in Paynesville. By then, the evening news in Monrovia was announcing that the Interfaith Mediation Committee had decided that Manos and Gios would be moved to Lutheran and Methodist churches for protection. Jesse said that we should all go to the Lutheran Church because the AFL soldiers were targeting Manos, and our last name—[REDACTED]—is Mano. [REDACTED] had previously gone to the Church and was able to help my family seek refuge at the Church. We were able to register under [REDACTED]'s umbrella.

21. In early June, everyone in my immediate household went to the Lutheran Church. There were about 12 of us in total. My youngest sibling was only a year old at the time, and my second youngest was just two years old. There, we met more of my relatives, who had arrived very recently. Some were relatives I knew from Monrovia and [REDACTED], and others were more distant relatives from [REDACTED] who I met for the first time at the Church. I would guess that about 20 to 25 of my extended relatives sought shelter at the Church.

22. When we arrived, I found a boy from my village, [REDACTED], who I saw as my older brother. [REDACTED] was writing down the names of people coming to the Church, and he volunteered me to help write down peoples' names with him. As I wrote down names, those arriving would receive a registration number, which were used to keep order at the Church—to organize food distribution and keep track of those present.

23. I remember seeing flags from both the Red Cross and the UN on the Church compound. I also recall hearing that the International Council of Churches and the Liberian Council of Churches were involved in running the shelter at the Church. My mother was a very religious woman and believed that Jesus would protect us at the Church.

24. When I arrived at the Lutheran Church compound, all the men were sleeping in the Church building. There were some mattresses, some of which had UN insignia on them, and [REDACTED] and I shared a small mattress. The women slept in the schoolhouse, which was next door to the Church, on the same compound. The women stacked the chairs on top of the desks and slept on the floor. I believe the rooms in the schoolhouse were divided by age, and my mother was in the room with older women. She brought my sisters into that room with her because she did not want to be separated from them.

25. I would estimate there were around 800 to 1,000 people sheltering at the Church around the time I arrived. However, the numbers continued to grow throughout June and July. When Charles Taylor's forces reached Paynesville, on the outskirts of Monrovia, in early July, that prompted a new wave of displacement and influx of people seeking shelter at the Lutheran Church. As the numbers grew, the Church turned into a gigantic pad of filth because of the large number of people crammed into one small area, with everyone using the



same bathroom. We would take turns cleaning the bathroom, but it wasn't sufficient. By late July, the Church was so over-crowded that they had to start turning people away.

26. It was patently obvious that everyone staying at the Church was a civilian seeking refuge. I interacted with many people at the Church as I registered them and as I sheltered there. To pass the time, I would play cards or talk about my studies with other students. I brought my math books with me and would read them, and other students and I would try to give each other the most difficult math problems that nobody could solve. From all these interactions, it was clear to me that those seeking refuge were poor people who had nowhere else to go, women trying to protect their children, high school kids, and university students. There were student leaders from the University of Monrovia and people from Nimba County and Central Liberia, but there were no rebel fighters at the Church. I never saw a rebel fighter or weapon among the people sheltering at the Church.

27. In June and July, many people staying at the Lutheran Church were coming and going between their homes and the Church because food, water, and other supplies were scarce. People would leave the Church in the morning and see what they could find, and then they would come back to the Church in the afternoon and sleep there at night. I went back to [REDACTED] a few times. Sometimes I would go to play soccer, as I loved the sport and trusted that my soccer coach would not tell people I was Mano. With soccer shoes hung around my neck, I just looked like a kid playing soccer, so the soldiers did not harass me. I also would go back to my family home [REDACTED] to collect clothes. To leave the Church, I would get in a taxi and pay the driver extra so they would do all the talking at AFL checkpoints, which were all over Monrovia at this point. I stopped leaving the Church probably sometime in early July

because the situation was getting worse in Monrovia, and because my little cousin [REDACTED] wanted to follow me, and it would have been too dangerous for her to leave the Church because she only spoke English.

28. From mid-June through July, AFL soldiers, especially those from the Special Anti-Terrorist Unit (SATU), were constantly watching the Church. I was able to identify SATU soldiers from the rest of the AFL because they were cleaner and better dressed, wore red berets, red socks, and red shirts, and had nicer cars. Everyone in 5<sup>th</sup> or 6<sup>th</sup> grade or above in Liberia could recognize the SATU. I would watch the soldiers offload right in front of the Church and stare into the compound. Whenever this happened, people in the compound would run into the buildings. This surveillance made me, and many others, fear that the AFL would attack the Church and kill all of us sheltering there. To provide some protection, the men at the Church set up a system where some of them would stay up overnight to keep watch over the compound, but they were not able to provide any real security. As people became more worried about the AFL, some left the compound and sought shelter elsewhere, including the nearby Methodist Church compound. We all knew we would be targeted; we just didn't know when or how it would unfold.

29. In late July, there were rumors circulating that the Lutheran Church was going to be attacked. We frequently saw AFL troops outside the compound saying awful things like "it's only a matter of days" and "let's take care of these dogs." I wanted to leave the compound and so did my sister [REDACTED], but my uncle [REDACTED] wanted to stay. He said that the AFL was all around, and there was nowhere safer for our family to go. He seemed dejected and helpless. This was the last conversation I had with my uncle [REDACTED].

30. Around this time, my mother told me she had a premonition that she would die soon, when the AFL attacked the Church. She said she was prepared to die, but she specifically wanted me and my brothers, including [REDACTED] and [REDACTED], to survive. She took out her market bag, where she had US\$500. I had never seen my mother with this kind of money before, and I believe she must have gotten it from her family in the United States. She said she heard the soldiers were only going for men and boys, but that they would let boys live in exchange for money. So, when soldiers came to attack, she planned to ask them to take the money in exchange for letting her children live. My mother also told me that if the Church was attacked, I should run to the classroom where she slept and hide there. My mother had put two desks together and said that I should hide under them with my siblings. She seemed to be convinced she wouldn't survive an attack on the Church, but she wanted all her children to hide under the desks. My mother made me promise that if I survived, I would graduate from college and get married.

31. The day after my mother told me about her premonition, she told me she also heard that the soldiers were killing women with gray hair, because they believed older women were more likely to have given birth to one of the rebels. My mother had gray hair, but she told me that other women were dyeing their hair to hide the gray, and that she would try to do the same. I think this was when she realized we were in grave danger.

32. On 28 July, trucks full of SATU forces—recognizable by their distinct uniforms—came to the Church. I was standing at the front entrance to the compound with Jefferson and saw the events play out. I remember thinking that the trucks pulling up looked like a tactical operation, based on movies I watched as a child. The soldiers jumped down from the trucks,

yelling that the rebels were in Central Monrovia. They threatened us, saying things like, "Let's just kill these people and get it over with." They then entered the Church compound and went to the back of the Church. The Reverend asked the soldiers to leave and assured them that there were no rebels in the Church. The Reverend told the soldiers that the Church compound was sacred, the UN and Red Cross were there, and the soldiers should please leave. The SATU force commander responded that the people at the Church were their citizens, and he and the forces wanted to make sure their people were protected. SATU remained in the Church for about 30 minutes and then went outside and circled the compound.

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

33. Although I spent nights inside the Church building, I could never sleep because I was so fearful that we would be attacked and killed in the night. I would stay up all night and only fall asleep around 5:00am. If we were attacked, my plan was to grab my little brother [REDACTED] and throw him over the Church compound's fence so that we could run away. I had naively convinced myself that my sisters and mother would be fine, as my mother said the AFL were only looking for boys.

34. On the night of 29 July, I was inside the Church building, in the fourth pew from the main entrance closest to Tubman Boulevard. Late that night, I heard a huge bang, as if someone banged on the door with a huge object. As the bang happened, the watchman yelled out that soldiers were here. As soon as I heard the bang, I grabbed [REDACTED] and we ran out of the Church to the classroom in the schoolhouse, where my mother was with my sisters. As I ran across the compound, I saw others running around, trying to escape, or trying to get their families out of the schoolhouse. I also saw soldiers with guns and machetes, and heard shooting

and people being stabbed and injured. But [REDACTED] and I were able to make it to the schoolhouse and the classroom with my mom and sisters, and my mom pushed us under the desks to hide.

35. I hid under a desk in the schoolhouse for more than an hour. I could hear the sounds of people being killed in the Church, and I could hear men trying to fight back with sticks and any other objects they could find. After the soldiers finished in the Church, they came to the schoolhouse. I am not sure what time it was at this point, but it felt as if multiple hours had passed. I was so fearful that I may have soiled myself.

36. When the soldiers arrived at the schoolhouse, I remained hidden under the desk. I feared that if I made any moves, I would be killed. From under my desk, I watched the soldiers and recognized they were from SATU, as I could see their red t-shirts and red socks. When the soldiers entered the schoolhouse, the women begged the soldiers to take money and spare their children. My mother gave the soldiers her \$500, and they told her to take her children and leave. But as my mother turned around, a SATU soldier shot her in the back. [REDACTED] jumped out of his hiding place, towards our mom, and a soldier struck him in the chest with a knife. [REDACTED] died almost instantly, but my mom was still alive. She lay on the floor of the classroom, calling out to my sisters for help. Each time she called out I could hear blood gushing out of her. But my sisters and I couldn't help her; we had to stay put so that the soldiers wouldn't kill us.

37. I remained hidden under the desk for the next three to four hours. I believe the only reason I survived the massacre was because the soldiers could not see me hiding under the desk, among other bodies.

38. As day broke, I got up to leave. I thought it would be safe to leave because I saw a woman near me get up, and there were no sounds of shooting when she moved. I also heard men in the church who had survived yelling, "If you're alive, run." I wanted to escape the Church compound and try to find my sisters, who were no longer in the schoolhouse. I touched [REDACTED] body, and it was cold. All I could think was that we both had our hair cut two days before. I saw my mother's body. It was in a pool of blood and her eyes were open. I was not sure if she was dead or alive. I also saw my cousin [REDACTED] in the doorway of the classroom that she and her mother had stayed in. She had been stabbed. When I tried to grab her, her body was cold and stiff [REDACTED].

39. I couldn't find the rest of my family. I later learned that my sisters thought I had died and had left the schoolhouse to avoid being raped by the soldiers. Even though I didn't want to leave my mother, [REDACTED], I heard someone yell that soldiers were coming and knew I had to go. I exited the schoolhouse and saw a group of boys I didn't recognize at the fence to the Church compound. We jumped over the fence and ran to a nearby foreign government embassy, trying to seek shelter there. The Embassy did not want to let us in, but a young guard saw the blood covering all of us and took pity on us, a group of young kids. This guard called another embassy, who said they were willing to take us in. Soldiers from that embassy came over and escorted me and the rest of the boys to their compound.

40. At the embassy compound, we were taken into the basement. A nurse took off our shoes, gave us food to eat, and bandaged us up. There was a TV in the basement, playing the news, and I remember seeing news footage of [REDACTED], my neighborhood in Monrovia. The embassy workers asked us where we wanted to go, and I said I wanted to go home [REDACTED].

██████████. As they drove me ██████████, we passed by the Lutheran Church. You could still see dead bodies on the sidewalk outside the Church. When we got to my family home, I saw that my childhood dog had died. This upset me because I couldn't believe that someone would kill my dog. The entire neighborhood was empty; everyone had abandoned their homes because Charles Taylor's soldiers had arrived.

## V. Leaving Liberia

41. From my family home ██████████, I decided to join the hordes of Liberians leaving Monrovia. I still didn't know where any of my family were and simply followed the people around me. We walked towards the Ivory Coast, trying to escape Liberia. Soldiers along the way had stolen my shoes, a pair of Converse sneakers, and I was walking barefoot; my feet were covered in blisters. When I first reached Kakata, I met a group of rebel soldiers that initially wanted to kill me. But once they learned that I was Mano and could speak Mano, they let me live. One of the rebels told me about a nearby camp for displaced persons at Gate 15, and I wanted to go there to try to find Jefferson. I knew ██████████ survived the massacre because I saw him jump over the fence when I was running to the schoolhouse. I found ██████████ at the camp at Gate 15, and we continued together towards the Ivory Coast.

42. It took me and ██████████ about a year to walk to the Ivory Coast, and we faced many threats along the way. Charles Taylor's rebel forces tried to forcibly recruit us many times, and we witnessed horrible atrocities.

43. I stayed in the Ivory Coast from 1991 to 1993. I then left for the United States as a refugee. I have not returned to Liberia since I left in 1991.

**VI. Efforts to Secure Justice for the Lutheran Church Massacre**

44. The Lutheran Church Massacre fundamentally changed my family. About 10 of my family members survived the Massacre by hiding, like I did, or by escaping from the compound. But I lost my mother, little brother [REDACTED], and about 14 other relatives in the Massacre. One of my cousins, [REDACTED], who was trying to escape [REDACTED] at the start of the massacre, was shot as he was jumping over the fence. I saw his body the next day as I was escaping. My cousin [REDACTED], my uncle [REDACTED]'s daughter, was also killed in the massacre. Another one of my other cousins was killed inside the Church. His body was cut in half with machetes. I did not see his body, but I heard about it from someone who did.

45. I have never received any official documentation regarding the deaths of my family members. I have heard that there is a list of people who were killed during the Massacre, but I have never seen it or had access to it. I have also heard that my mother was buried at the beach, but I have not received any official notification about where she or any of my other family members are buried.

46. I am committed to securing justice for my family and other victims of the Lutheran Church Massacre, as well as other victims of Liberia's Civil Wars. I am not aware of any steps the Liberian government has taken to investigate the Lutheran Church Massacre and bring those responsible to justice. The government has long blamed the Massacre on Charles Taylor's rebel forces, despite widespread knowledge that the government's AFL soldiers were responsible. The government also has not provided any reparations to victims of the Lutheran Church Massacre or other wartime violations. After Ellen Johnson Sirleaf was elected president of Liberia, when there was finally some stability in the country, I believe the government should



have acknowledged that it was government forces which were responsible for the Massacre and held itself accountable. Liberia should have memorialized the Massacre and provided truth to its people. The government should have provided some form of reparations to the victims.

47. I have long advocated for the need to establish a war crimes court in Liberia to criminally investigate and prosecute wartime atrocities. [REDACTED]

[REDACTED]

48. [REDACTED]

[REDACTED]

[REDACTED] All the survivor organizations that I work with

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[REDACTED]

advocate for justice for wartime atrocities, the establishment of a war crimes court in Liberia, and reparations for victims and survivors. Because the government has failed to support victims with reparations, I have worked with survivor organizations and Liberian civil society leaders to raise money for victims, to help cover medical care and other basic expenses they are not able to afford on their own.

49. I have received threats because of my advocacy for justice in Liberia. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Because of these

threats, I feel that I cannot safely return to Liberia. My family fears that if I were to go back or even participate in cases like this one seeking justice for the Lutheran Church Massacre, something would happen to me.

## VII. Impact of the Lutheran Church Massacre

50. Liberia's Civil Wars and the Lutheran Church Massacre drastically changed my life. I went from a 16-year-old in high school to having to be responsible for myself as I fled my home country. I lost out on my opportunity to be a teenager. My career plans were upended. When I was growing up, I loved math and had dreams of becoming an engineer. But the Massacre interrupted those plans, forcing me to leave my home and my family and flee to the United States. I graduated from college because of the promise that I made to my mother, and I became a [REDACTED] so that I could fight for justice for my family and other Liberian victims.

[REDACTED]

[REDACTED]

51. I have suffered tremendously as a result of the Massacre. I never expected that [REDACTED] or my cousin [REDACTED] would be killed in the Massacre, and their deaths were particularly difficult to deal with. I have also always felt that my sisters wanted me to step up when my mom was calling out for help. I feel that I let down both my mother and little brother. I was always a mama's boy and wanted to make my mom proud. It was so important to her that I graduate from high school and college and get married, but my mother never got to see me do those things. My college graduation [REDACTED] was one of the saddest days of my life because my mother and family could not be there. Some of my classmates had family from Africa present, dressed in beautiful clothing, but my family could not be there.

52. I experience emotional pain and mental anguish from the lack of justice for the Massacre. I feel tortured when I hear warlords making proclamations and when I hear Liberian government officials saying that they are "working on" achieving justice and accountability. When the Liberian government denies their responsibility for the Massacre, it feels like they are telling me that I am not human. Because there has been no justice, I sometimes feel that a dog on the street of Monrovia had greater value than my mother and the other victims of the Lutheran Church Massacre. This is a constant pain that I feel, especially when I see warlords living free in the country I had to flee. I have never been able to return to Liberia and to the Lutheran Church to grieve, which I have to do in order to heal. So long as those responsible continue to hold power in Liberia and Liberia fails to hold them to account, I will not be able to grieve and heal.

53. I also continue to experience trauma from living through the Massacre myself. I have never healed; I have just learned to cope. The pain is continuous: I feel violated, taken,

and cheated. I have found ways to distract myself but, quite often, I'm right back to where it all started. I sometimes have flashbacks to the Massacre and have woken up from nightmares many times, yelling things like, "They're coming!", crying, and drenched in sweat. Sometimes, I am unable to sleep, and I spend the whole night replaying the events in my head and thinking, "What if?" I also have suffered from depression as a result of surviving the Massacre. I constantly ask myself whether I have done enough to seek justice. The only things keeping me going and helping me feel like a real human being are my children.

### **VIII. Hopes for Justice**

54. I would like to see a war crimes tribunal established in Liberia, to hold perpetrators accountable for the atrocities they committed, including the Lutheran Church Massacre. I believe that criminal accountability would serve as an example for future generations and set a precedent that you cannot just wake up and slaughter innocent people, even during a civil war. I have forgiven what happened in the Massacre, but forgiveness and justice are two separate things. To blindly forgive, without prosecutions or efforts to hold individuals responsible for their actions, is unacceptable.

55. I would like to see the Liberian government admit that its forces carried out the Massacre and that it was wrong, and to apologize for its actions. I believe that an admission and apology are important for closure, both for myself and for other victims of the Massacre. I also believe that an acknowledgement could help teach future generations that this is not how a government treats its own citizens.

56. Victims of the Massacre and other events in the Civil Wars should also receive reparations for the harms they suffered. Survivors of the Massacre sometimes call me, asking

for money, because they have such great needs. For example, some need ongoing medical treatment for their injuries from the Massacre, and others, unable to work because of their injuries, need money to meet their basic needs and to support their families. Compensation should be made available to victims of the Massacre and their descendants, to provide them with educational opportunities and scholarships, and to meet other needs they might have. I believe that if more Liberians had been educated, the tragedies of the Civil Wars could have been avoided. This is why I believe that educational assistance is so important for the future of the country. I would also like to see schools built in the names of people who lost their lives in the Massacre.

57. In addition, I would like to see memorials for the Massacre. Memorials will not just serve to acknowledge the harms victims suffered, but they can also serve educational purposes. I want future generations to be able to visit memorials to learn what severe violations can result when political leaders turn a blind eye to the common good of humanity and focus on themselves.

58. Personally, I would love to be able to go back to Liberia. I want to visit [REDACTED], the village where I was born and where I grew up. I want to go back to the Lutheran Church. I want to walk, stand, and cry there, and talk to my mom, [REDACTED], and [REDACTED]. My sisters talk about visiting the Lutheran Church, and I would like to be able to go with them. I think that would help me heal. But we cannot return to Liberia as long as the people responsible for the killings are walking around freely. I do not want to fear that I will be attacked again in my sleep.

59. I want Liberia to be a country where people can live peacefully. Without justice, people are unable to heal, which may create a real likelihood that they will take up arms and

conflict will resurge. I want to see justice so that Liberians can grieve together as one country, rather than living in a country where warlords dictate the future.

60. I want the ECOWAS Court to hear this case because this case can begin to recenter the human rights of Liberian victims in the international effort to bring functional democracy to Liberia. I want this not for myself, but for the country, so that Liberians can finally begin to heal and move forward.

61. I depose this statement bona fide and in accordance with United States law.

