

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

I, William W, declare under 28 U.S.C. § 1746 as follows:

I. Personal Background

1. I am a Liberian citizen and currently reside in [REDACTED], Liberia. I have lived in Liberia my whole life, except for two years in the early 1970s [REDACTED]. I am a member of the Kpelle tribe.

2. I have been an active member of the St. Peter's Lutheran Church (the "**Lutheran Church**") since 1986. In [REDACTED], I joined the church choir and a group that read the bible every morning. Two years later, in [REDACTED], I began volunteering to clean the church and prepare it for worship services. In [REDACTED], I became an usher at the church. I have also joined other committees at the church and have remained an active member there.

II. The Refugee Center at the Lutheran Church

3. When the first Liberian civil war broke out, I was working [REDACTED] at the Bishop's Compound, which is only a few blocks from the Lutheran Church in Sinkor, Monrovia. I began that job in [REDACTED] and was living on the compound [REDACTED]. I also remained actively engaged at the Lutheran Church, volunteering and attending worship services there.

4. As Charles Taylor's soldiers approached Monrovia in mid-May 1990, tensions began mounting in Monrovia. Many civilians, especially people from Nimba county, began to flee their homes, seeking safety from the oncoming violence. They moved from one place to another, trying to seek refuge. During this time, people were being threatened in Monrovia, especially at night. Some mornings, I would wake up and find dead bodies in the street. Because of these threats and deaths, people began moving around, trying to find safe places to seek shelter.

5. One of the first places that civilians went to was the old United Nations (“UN”) compound in Sinkor. People also sought shelter at other places, but many went to the UN compound thinking it would be safer because it was a compound belonging to an international institution. But the UN compound was not secure. One night, I believe at the end of May or beginning of June 1990, Armed Forces of Liberia (“AFL”) soldiers went to the compound and abducted people, killed people, arrested people, and raped people.

6. Following this attack, [REDACTED] Bishop Ronald Diggs, led the Christian community’s effort to secure alternative shelter for the displaced persons. Bishops and church leaders from the Liberian Council of Churches met to discuss where people could go that could be safer. The community chose the Lutheran Church because they believed it to be a secure space. The church had a fence around it that was five or six feet high, and people thought that would offer protection to the compound. So, in early June 1990, the Bishops and church leaders took people from the UN compound and brought them to the Lutheran Church.

7. The church was clearly marked as a Red Cross shelter, as there was a Red Cross flag waving at the front of the church. There was also a UN flag at the church, and workers from the UN, World Health Organization, and Red Cross were all present at the church to support the civilians sheltering there. They worked together, under the guidance of the Liberian Council of Churches, to provide food, water, and basic medical care to the civilians sheltering at the church.

8. Members of the Lutheran Church were also at the church every day to assist the civilians sheltering there. The church members organized themselves to work in shifts to provide food and water to those taking shelter at the church, and to conduct devotions at the church. We organized ourselves so that during the day, there were always volunteers working at

the church. I volunteered at the church every day. We received food donations from church members and from other organizations.

9. There was a registration office at the front gate, and church members would register families that came into the church compound. There was also a clinic on the premises to provide basic first aid to the people sheltering at the church.

10. After the initial group of people came to the Lutheran Church from the UN compound, other civilians in Monrovia also began going to the church, seeking shelter. I would estimate that in June 1990, there were more than 500 people seeking shelter at the church. The numbers kept swelling and swelling and swelling so that the church could no longer accommodate people.

11. The people seeking shelter at the church came from all over Monrovia and the suburbs, but most people were originally from Nimba county. It was mostly Manos and Gios from Nimba county who wanted protection. There was a large mix of genders and ages at the church; there were old men and women, middle age people, younger people, children, babies, and babies' mothers. All of them were there because they wanted to seek refuge at the church.

12. I never saw or heard of any rebel activity at the church. And I never saw any weapons at the church. The entrance and exits to the church had a security check to make sure that everyone entering the church did not have weapons. No knives, weapons, or ammunition were allowed in the church.

13. Because of the UN and Red Cross flags, the humanitarian workers, and the large number of civilians of all ages who were living there, it was very clear that the Lutheran Church was serving as a shelter for displaced people. It was no secret that civilians were seeking shelter

at the church; everyone who went by the church could see that people were staying at the church because they needed protection.

14. During this time, the Lutheran Church was also still serving as a place of worship. We held devotions every morning and evening services every night before people went to sleep. The daily prayer services were held to spiritually heal the wounds of the people, to encourage them, and to give them hope that God would stand with them and rescue them from danger. People would also sing and give praise and ask God for grace, mercy, and protection. We also held a general worship service on Sundays.

15. The Lutheran Church is located on Tubman Boulevard which is a main road leading out of Monrovia. While at the Lutheran Church, I often saw military vehicles and AFL soldiers drive in front of the church. Sometimes they would shout threats as they drove by.

III. The Attack on the Lutheran Bishop's Compound

16. During this time, I lived on the Lutheran Bishop's Compound in Sinkor, Monrovia, between 12th and 13th Street. The compound was a few blocks from the Lutheran Church, towards the beach. There were about 300 of us residing on the Compound. There was a guest house on the compound [REDACTED]. Before the war, the guesthouse was used to accommodate people who came to the church from afar—from rural parts of Monrovia and from abroad—and to generate income for the church. But during the war, many church members from all over Monrovia and rural parts of Liberia came to the compound to seek refuge there.

17. On July 29, 1990, at around 11:00 a.m. or 12:00 p.m., I was attending the Sunday worship service at the Bishop's Compound. Immediately after the pastor gave a benediction, someone tapped me and said to look behind me because soldiers were coming. I turned around,

and from where I was in the chapel on the second floor, I could see the Compound was surrounded by soldiers from the AFL. The soldiers surrounded the Compound and barricaded it, blocking it from the side of the ocean, and at the 13th and 12th Street entrances.

18. More than twenty soldiers entered the Compound. They were armed, and most were wearing olive green uniforms, embroidered with the letters AFL on one upper arm and had on combat boots. Some also had traditional charms hanging on them. The commander of the raid wore a shirt and vest with no sleeves, jean trousers, and had one foot in a military combat boot and another in a bathroom slipper. He also had a rope tied around his head that was decorated with three *gamo*, which are seashells used in Liberia for traditional purposes, including as charms for protection and for decorating warriors' traditional garments to instill fear in ordinary people and indicate danger. The man moved furiously up and down the courtyard. I did not know his name, but people told me that he was Tilley, a notorious man in the AFL.

19. We kept worshiping and as we were singing the last song, the soldiers entered the compound. One spoke very loudly saying, "Jesus will save you today! All men come outside, come downstairs." Then the soldiers began to advance to the building where we were attending church services on the second floor.

20. When I was still in the chapel, I heard gunfire in the stairwell where the soldiers had gone. When I left the chapel to leave the building, I passed the dead body of a young girl on the stairs. It was very frightening to see, because it made me fear that I would be killed just as she was. The girl was the adopted daughter of Bette McCrandall, who was the secretary to the office of the Bishop. I heard from other people who were in the stairwell that she got into an argument with one of the AFL soldiers and raised her hand to slap him, and in response, he shot her.

21. As the men exited the building where the church services were happening, the AFL soldiers began grabbing people and putting them in cars. They then drove off with people, taking them to unknown destinations. The soldiers also looted the compound, taking food, clothing, money, typewriters, vehicles, and anything else they could find.

22. One of the people they took was Pastor Joseph Allison, the lead pastor at the Lutheran Church. He was released later that day and was told to take his things from the compound and then leave. I was still at the compound when he returned and saw him collect his things and then leave to find another place to seek refuge. But most other people who were taken from the compound were never seen again.

23. The soldiers took [REDACTED] James Forkpah, who was the acting director of the Liberian National Police. James went to the soldiers when they arrived, thinking he could restore calm, but the soldiers took him and forced him into a car. His wife, [REDACTED] then rushed in and began begging to release her husband, but they ignored her and drove away with James. About an hour later, the soldiers returned and asked where is the lady who was crying for her husband. The soldiers then forced her into a vehicle, leaving her children unattended. I have not seen either James or his wife, [REDACTED] since that day.

24. After I left the building where the church services were happening, a soldier grabbed me by the shirt and dragged me into the courtyard. I remember trembling with fear, thinking that I would be executed. But one of the other soldiers recognized me and came to my rescue. He stood between me and the other soldier, pushed us apart, and asked me if I knew him. I was afraid, so I said that I didn't know where I knew him from. The soldier then instructed the one who had grabbed me to leave me alone, saying that I was a good man who had treated him

well in the past. The soldier who recognized me then took me to where a group of older people and foreigners were sheltering and told me to stay there and not leave.

25. I remained there until around 5:00pm. At that point, a man came to the compound and introduced himself as the commander of the Special Anti-Terrorist Unit (“SATU”) but did not give his name. He placed two of his soldiers at the entrance to the compound and told them to guard the compound and not let anyone else in, as we had been hurt in the attack that morning. Then the commander left, leaving his two soldiers to guard the compound.

IV. The Lutheran Church Massacre

26. After the SATU commander left, we remained at the Bishop’s Compound, very fearful. Around 7:00pm that night, those of us left at the compound gathered in the conference hall with our mattresses. We planned to sleep there that night, as we were fearful of being attacked again. We held devotion together, and then we went to sleep.

27. At around 10:00 p.m. or 11:00 p.m. that night, while we were asleep, I heard heavy shooting. I could not tell what direction it was coming from. Because we were all still terrified from what happened earlier that day, none of us made any attempt to go outside and see what was happening. Instead, we remained where we were and prayed that we would stay safe that night, that nobody would come back to attack us.

28. Early the next morning, someone came to the Bishop’s Compound and told us that there had been a massacre at the church, and that some survivors were still there.

29. Bette McCrandall told me to stay at the compound while she went to the embassy. I did walk to the church but didn’t dare enter, as I remained fearful. From outside the perimeter, I could see dead bodies all around the church, hanging from the balcony of the school and scattered in the yard and courtyard.

30. I later learned that one of the people killed in the church was Pastor Nyumah Tayee, who usually stayed at the Bishop's Compound. On the morning of July 29, Pastor Allison had sent Pastor Tayee to lead the regular Sunday worship service at the Lutheran Church. Pastor Tayee normally would have returned to the Bishop's Compound after leading worship services. But he did not return on July 29, maybe because he heard about the attack that was happening at the Bishop's Compound and was too afraid to return. Pastor Tayee was at the Lutheran Church the night of July 29, and he was killed in the attack on the church.

31. Because I was not at the Lutheran Church when it was attacked, I cannot say who was responsible for the massacre. But I do know that AFL soldiers controlled the area around the Lutheran Church in late July 1990. The frontline with the NPFL rebels was around the James Spriggs-Payne Airfield—the rebels could not advance beyond the airfield into Monrovia, and the AFL could not advance beyond the airfield out of Monrovia. The airfield was like a buffer zone. On the other side of Monrovia, Prince Johnson's forces were only on Bushrod Island and beyond, far from the Lutheran Church. I knew where the front lines were because they were widely reported on the radio, in particular by the BBC World Service. On the night of July 29, only AFL soldiers could have operated freely from the Spriggs-Payne Airfield to Bushrod Island, an area which included the Lutheran Church and its surroundings, as rebels were not present and there was a curfew out for civilians.

V. After the Lutheran Church Massacre

32. I left Monrovia in mid-September 1990 and returned back to Monrovia in 1991. Before I left, the Lutheran Church was still in disarray. But by the time I returned in 1991, the church was under reconstruction. I understand that efforts to rebuild the church began around October or November 1990, after the Economic Community of West African States Monitoring

Group (“**ECOMOG**”) forces took control of Monrovia and restored security. Church members began cleaning and rebuilding the church, cleaning the yard, fixing broken pews, and burying the dead. The church finally re-opened for worship in March 1992.

33. Most massacre victims were buried at the church. There are two mass graves located at the church, both marked with a star. But some victims from the massacre were also buried at the beach, because the church compound was not large enough to bury all the bodies from the massacre. Church members had to take some of the remains to the beach and bury them there.

34. Each year, the Lutheran Church holds a memorial service to commemorate the anniversary of the massacre and to respect those who died. It is organized by the Liberian Council of Churches and the Lutheran Church. We lay wreaths and flowers on the graves of those who died. The service is attended by government officials and members of international bodies, NGOs, and the church. It is an important service to hold each year, because the massacre had such a strong impact on the families who lost their loved ones, and on the community of the Lutheran Church. While the massacre happened more than 30 years ago, the story is still told, and it will always be told. People who survived the massacre or lost their families at the church will always be reminded about what happened there. The pain and hurt from the massacre will continue to be felt, both by individuals and by the institution of the Lutheran Church in Liberia, which is still trying to recover.

35. The Lutheran Church massacre left a scar on the minds of many people in Monrovia. The scar is still on our minds, and it will be there for many years. Because of the massacre, many people were separated from their families. Some people fled Liberia and are still outside the country, out of a fear that Liberia is not a safe place for them to return. The

Lutheran Church has lost many members because they fear that Liberia is no longer safe. That separation brings a lot of pain, agony, and hurt into our hearts.

36. The massacre also brought about separation for those who lost their family members. I suffer the pain of lost family members, [REDACTED]

[REDACTED]. [REDACTED]. [REDACTED] I and their children were never able to see them again. I still grieve for what happened to my family members. It was senseless and meaningless. I still feel those scars from separation, hurt, and damage. It causes me deep pain. And I can imagine that the people who lost loved ones in the massacre at the Lutheran Church feel similarly. I know there are some church members who lost their wife and children in the massacre. Whenever they enter the church compound, they see the star that marks the grave where their wife and children lie, and they are reminded of their loss. They must experience so much grief, as they are constantly reminded of the massacre and their loss.

37. Since the massacre and the civil wars in Liberia, there has been no true reconciliation between individuals, institutions, and tribesmen. Even though the Truth and Reconciliation Commission was established, it did not bring true truth, justice, and reconciliation to people in Liberia because its recommendations were not fully implemented. Liberia still has not recovered from the harms suffered during the civil war.

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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 21, 2020, in [REDACTED], Liberia.

[REDACTED]

[REDACTED]

[REDACTED]