

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

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SULEIMAN ABDULLAH SALIM,  
MOHAMED AHMED BEN SOUD, OBAID  
ULLAH (as Personal  
Representative of GUL RAHMAN),

Plaintiffs,

Civil Action No.

vs.

2:15-CV-286-JLQ

JAMES ELMER MITCHELL and  
JOHN "BRUCE" JESSEN,

Defendants.

- - - - - x

DEPOSITION OF MOHAMED AHMED BEN SOUD

VOLUME II

February 1, 2017

Reported by:

Jane M. Borrowman, RPR, CSR

Job no: 17958

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DEPOSITION OF: MOHAMED AHMED BEN SOUD, VOLUME II

LOCATION: Held at the Fort Young Hotel  
Victoria Street  
Roseau, Dominica, West Indies

DATE: February 1, 2017

TIME: 8:59 a.m.

1 APPEARANCES:

2 ON BEHALF OF THE PLAINTIFFS:

3 Hina Shamsi, Esq.

4 Steven M. Watt, Esq.

5 AMERICAN CIVIL LIBERTIES UNION FOUNDATION

6 125 Broad Street - 18th Floor

7 New York, New York 10004

8 212-284-7321

9 Hshamsi@aclu.org

10 - and -

11 Avram D. Frey, Esq.

12 GIBBONS, P.C.

13 One Gateway Center

14 Newark, New Jersey 07102-5310

15 afrey@gibbonslaw.com

16

17 ON BEHALF OF THE DEFENDANTS:

18 James T. Smith, Esq.

19 Charrise L. Alexander, Esq.

20 BLANK ROME, LLP

21 1825 Eye Street NW

22 Washington, DC 20006-5403

23 Smith-JT@BlankRome.com

24 CalAlexander@BlankRome.com

1 ALSO PRESENT:

2 Ms. Nevine Ibrahim, Arabic Interpreter

3 Mr. Bashar Alhalabi, Arabic Interpreter

4 Mr. Bill Slater, Videographer

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I N D E X

WITNESS: MOHAMED AHMED BEN SOUD - VOLUME 2

Continued Examination by Mr. Smith ..... 181

Examination by Ms. Shamsi ..... 303

E X H I B I T S

NO.	DESCRIPTION	PAGE
1	Senate Select Committee on Intelligence Finding and Conclusions Executive Summary - Approved 12/13/12	196
2	Document from Wikipedia: Libyan Islamic Fighting Group	201
3	Complaint and Demand for Jury Trial	283

1 P R O C E E D I N G S

2 VIDEOGRAPHER: Here begins day two  
3 in the deposition of Mohamed Ahmed Ben Soud.  
4 We're back on the record. The time is 8:59.

5 MS. SHAMSI: I wanted to just put on  
6 the record a proposal that I have made to  
7 Mr. Smith, which is that in the interest of  
8 both accuracy and moving things along fairly,  
9 that he consider using our interpreter or at  
10 least trying out our interpreter for part of  
11 the day. And Mr. Smith is considering the  
12 proposal.

13 MR. SMITH: Yeah. Let me -- let me  
14 just state for the record that there are two  
15 interpreters here. And as the record will  
16 demonstrate from yesterday, any time that the  
17 interpreter for the ACLU thought that there  
18 may be some question about the accuracy of the  
19 interpretation, I urged him to speak up, and  
20 he did.

21 I don't know how many times he spoke  
22 up, but I don't think it was very many,  
23 counsel, and so I'm struggling to understand  
24 your concerns about accuracy, but I'm mindful.

1 I want the record to be accurate.

2 Again, I'll urge you, sir, if you  
3 think that something is being inaccurately  
4 interpreted, please speak up.

5 And what I would ask is that the two  
6 interpreters at the next break confer and see  
7 if the two of you agree that if we substituted  
8 you into my interpreter's chair and her into  
9 your chair, if that would make things proceed  
10 more quickly. If you two can agree on that,  
11 then that's something that I would certainly  
12 consider, because we want to get this  
13 completed as quickly as we can.

14 So, with that, why don't we march on  
15 and we'll see where that takes us.

16 MS. SHAMSI: I appreciate that, Jim,  
17 and I think the interest factor of seeing it  
18 move along are ones we all share.

19 MR. SMITH: Yeah, but I -- I want to  
20 make clear, I don't think there's anything  
21 about the record that's inaccurate so far.

22 MS. SHAMSI: I think there were a  
23 couple of things where it was sort of -- and  
24 an interpretation can be hard, I very much

1 understand and respect that, but I think that  
2 precise words that Mr. Ben Soud was using, may  
3 have been using, were not reflected because  
4 the interpreter was, perhaps, thinking out  
5 loud on the way to arriving at the final word,  
6 which is what got reflected in the -- in the  
7 transcript or the record.

8 And I can go back a little bit later  
9 on today, I don't want to hold it up, but  
10 later on today when I would like to do some  
11 clean-up of the transcript and sort of iron  
12 out those issues.

13 MR. SMITH: Okay. Do you speak  
14 Arabic?

15 MS. SHAMSI: I do not.

16 MR. SMITH: Okay. And I don't  
17 either. And it would seem to me that if  
18 you're aware of that, it's because it was  
19 brought to your attention by the interpreter,  
20 your interpreter.

21 MS. SHAMSI: That's correct.

22 MR. SMITH: And I've urged your  
23 interpreter to bring these types of concerns  
24 promptly to everyone's attention, and I



1 thought that he did.

2 So why don't we just leave it at  
3 that, for now, and we'll see where all this  
4 takes us. Fair enough?

5 MS. SHAMSI: Fair enough for now,  
6 yes.

7 (Witness previously sworn.)

8 MOHAMED AHMED BEN SOUD,  
9 a witness called for examination by counsel  
10 for the defendants, having been previously  
11 duly sworn, was examined and testified as  
12 follows:

13 CONTINUED EXAMINATION

14 BY MR. SMITH:

15 Q. Mr. Soud, good morning.

16 A. Good morning.

17 Q. Did you get a good night's rest?

18 A. Yes. (In Arabic.)

19 Q. So I want to pick up --

20 A. Yes.

21 Q. I want to pick up where we left yesterday,  
22 left off yesterday. You were taken to a  
23 facility sometime, I guess, in September of  
24 2003 by the CIA?

1 A. (Translation.)

2 Q. Did anyone explain --

3 A. Yes.

4 Q. -- to you why you were taken to that facility?

5 A. No.

6 Q. Did anyone from the CIA ever advise you that

7 because of your affiliation with the Libyan

8 Islamic Fighting Group, the United States

9 believed that you were affiliated with

10 Al-Qaeda?

11 MS. SHAMSI: Objection. You may

12 answer.

13 THE WITNESS: No.

14 BY MR. SMITH:

15 Q. What were you told?

16 A. The first meeting where I knew that I was at

17 the grasp of the CIA and that the place I was

18 in was -- belongs to that -- this institution

19 belonged to the CIA, that short encounter,

20 which took place as soon as I arrived to the

21 prison Cobalt, she told me, that interrogator,

22 now you are in the grasp of the USA and that

23 you do not have any rights in this place.

24 Q. What else did she say?

1 A. She didn't say anything.

2 Q. Now, you used the word "Cobalt." When did you  
3 learn about the word "Cobalt"?

4 A. Later on and through me following the media  
5 during -- through the days, it came to my  
6 knowledge that the place I had been in was  
7 called "Cobalt."

8 Q. At the time that you were taken to the  
9 facility and while you were there, did you  
10 know what the name of the facility was?

11 A. No.

12 Q. Did you know what country the facility was  
13 located in?

14 A. I did not know. At that time, I did not know.

15 Q. Do you know now?

16 A. I knew through following up the media and the  
17 news that that place was called Afghanistan.

18 Q. Now, when did you find out that this place  
19 called "Cobalt" was located in Afghanistan?

20 MS. SHAMSI: Objection. You may  
21 answer.

22 THE WITNESS: I don't know exactly,  
23 but through following the media.

24 BY MR. SMITH:

1 Q. Do you know what source you relied upon to  
2 come to the conclusion that Cobalt was in  
3 Afghanistan?

4 A. Through interrogations and the media.

5 Q. Are you telling me that the interrogators told  
6 you that Cobalt was in Afghanistan?

7 MS. SHAMSI: Objection. You may  
8 answer.

9 THE WITNESS: No. Interrogations  
10 did not tell me that. If what you mean is  
11 reports from the media and the news told me  
12 about that, yes, while I was following, I knew  
13 that that -- that the place was in  
14 Afghanistan.

15 BY MR. SMITH:

16 Q. How long were you at Cobalt?

17 A. A year and few days.

18 Q. So you arrived there sometime in September of  
19 '03?

20 A. I arrived at the prison Cobalt in April of  
21 2003.

22 Q. Okay. And you remained at Cobalt until April  
23 of '04?

24 A. Yes.

1 Q. And how many other people were detained with  
2 you at Cobalt during that time?

3 A. I don't know exactly.

4 Q. Can you tell me the names of any other people  
5 that were detained there with you?

6 A. Khalid al-Sharif was there. Ayoub was there.

7 Q. You gotta go a little slower. Spell the  
8 names, please.

9 A. K-H-L-E-D (sic), A-S-H-A-R-E-E-F. Ayoub was  
10 there. Ayoub, A-Y-O-U-B. Majed was there.  
11 M-A-J-E-D. Saleh Al-Driki was there. S-L --  
12 S-A-L-E-H. A-L-D-R-I-K-I.

13 Q. Do you recall the names of anyone else that  
14 was detained at Cobalt during the period of  
15 time that you were detained?

16 A. Now, this is all what I recall.

17 Q. During the period of time that you were at  
18 Cobalt, did you have any contact with a  
19 Suleiman Abdullah Salim?

20 A. I didn't know that this person was there.

21 INTERPRETER: The interpreter would  
22 ask -- the interpreter would ask the counsel  
23 to repeat the last name of Suleiman.

24 MR. SMITH: Sure. It's Salim,

1 S-A-L-I-M.

2 INTERPRETER: Okay. Salim. Last  
3 name, please. This is it, Salim?

4 MR. SMITH: That's the last name.

5 INTERPRETER: Suleiman Salim.

6 A. I did not know about that person.

7 Q. Who -- did you know this person, Ayoub?

8 (Translation discussion.)

9 Q. The question was, did you know this person  
10 named Ayoub?

11 INTERPRETER: Interpreter would make  
12 a correction for the record. Did you know  
13 that this person was named Ayoub?

14 MR. SMITH: Well, that's in English.

15 (Translation.)

16 A. I know someone called "Ayoub."

17 Q. Was Ayoub part of the LIFG?

18 A. Yes.

19 Q. Was he affiliated with Al-Qaeda?

20 A. No.

21 Q. Majed, was Majed a part of the LIFG?

22 A. No.

23 Q. Was Majed part of the or affiliated with  
24 Al-Qaeda?

1 A. No.

2 Q. How do you know?

3 A. Because he is a member in LFIG (sic).

4 Q. Well, yesterday, you told me that there were  
5 members of LIFG who supported Al-Qaeda. Do  
6 you remember that?

7 A. Yes.

8 Q. Did Majed support Al-Qaeda?

9 MS. SHAMSI: Objection. Asked and  
10 answered.

11 THE WITNESS: No.

12 BY MR. SMITH:

13 Q. Did Ayoub support Al-Qaeda?

14 A. No.

15 Q. This individual named Saleh al-Driki, was he a  
16 member of the LIFG?

17 A. Yes.

18 Q. Did he support Al-Qaeda?

19 A. No.

20 Q. How many other members of the LIFG were  
21 detained at Cobalt while you were there, do  
22 you know?

23 A. Those persons.

24 Q. Okay. Now, I want to start in April and I

1 want to proceed month by month and ask you  
2 about what happened to you while you were  
3 there.

4 So let's start in April of 2003.  
5 Can you describe for me the conditions that  
6 you confronted while you were detained in  
7 April of 2003?

8 MS. SHAMSI: Objection. You may  
9 answer.

10 THE WITNESS: The conditions that  
11 has faced me since I was transferred to the  
12 new place that they have promised that I would  
13 find it very difficult circumstances over  
14 there, very difficult to the extent that it  
15 could be described as very harsh, and there I  
16 was prone to bodily manipulation and my  
17 dignity as a person was invaded.

18 I was exposed to threats, fear, food  
19 deprivation and sleep deprivation.

20 And, as well, I was exposed to the  
21 use of several torture methods. I was exposed  
22 to a lot of atrocities. I was exposed to  
23 being left in the darkness, not being able to  
24 know what time I was in, night or day.



1 I was deprived from performing my --  
2 performing the prayer and knowing where was  
3 the Qibla, Q-E-B-L-A (sic). And I was exposed  
4 to deafening music all the time that I was  
5 there.

6 I was exposed to being naked for  
7 long periods. I was exposed to being shackled  
8 in -- in strenuous positions. I was exposed  
9 to being hanged by my legs for long periods.  
10 And, there, I suffered lots of humiliation.

11 MR. ALHALABI: Just a moment. She  
12 missed solitary and --- solitary, solitary  
13 confinement.

14 Also, shackling, I don't recall him  
15 saying by the legs. He said in uncomfortable  
16 positions.

17 INTERPRETER: At the very end, he  
18 said "I was shackled from my -- hanged from my  
19 legs for long periods of time," at the very  
20 end of his statement.

21 MR. SMITH: Do you agree with that?

22 MR. ALHALABI: I don't recall him  
23 saying legs. I...

24 BY MR. SMITH:

1 Q. So let's ask him if he said it.

2 A. I was hanged by my -- by the hands for a --  
3 for a long time.

4 MS. SHAMSI: Jim, I'm sorry. If you  
5 could just translate, when you asked him the  
6 question about whether he was hanged by the  
7 legs --

8 INTERPRETER: Yes.

9 MS. SHAMSI: -- did he say yes, he  
10 was, or no, he --

11 INTERPRETER: No. He said he was  
12 hanged by the hands for long periods or for a  
13 long time.

14 MR. SMITH: We agree?

15 MR. ALHALABI: Yes. We're good.

16 Now, we're good.

17 (Translation.)

18 BY MR. SMITH:

19 Q. Mr. Soud, are you able to recount for me what  
20 you experienced on a month-by-month basis, are  
21 you able to break it up that way?

22 A. It would be difficult for me to narrate the  
23 story on a month-by-month basis and this is  
24 because of the condition and the difficult

1           surroundings that I have been in, as well,  
2           because I didn't know the times. I was not  
3           aware, myself, whether it was night, whether  
4           it was day, or in any day we are in or any  
5           months.

6       Q.    Okay. Now --

7                    MS. SHAMSI: Jim, can we just take a  
8                    break and can I just talk with you about a way  
9                    it might be easier for you to get what you're  
10                   looking for? Would that be appropriate?

11                   MR. SMITH: Well, I'm getting what  
12                   I'm looking for, but --

13                   MS. SHAMSI: Okay. All right.  
14                   Yeah.

15                   THE WITNESS: But I can talk about  
16                   the stages that I went through, these -- in  
17                   that place, these stages, torture stages, that  
18                   I went through in that place.

19       BY MR. SMITH:

20       Q.    How many stages were there?

21       A.    According to what I think, there were -- due  
22            to my personal experience, there were three  
23            stages.

24       Q.    What was the period of time that you

1 considered to be the first stage?

2 A. The first stage since I arrived to that place  
3 and which lasted for two weeks, nearly.

4 Q. Okay.

5 A. This stage was a tough stage.

6 Q. Can you tell us what happened during this  
7 first stage for two weeks?

8 A. In that difficult -- in that difficult stage,  
9 the first stage, I was forced to take off my  
10 clothes. I was shackled, hands and legs, by  
11 iron, steel shackles, or metal shackles, to  
12 the wall. I was put in a dark and cold cell.  
13 Loud music was applied for some time -- for  
14 all the time. Then, I was being let outside  
15 from time to time from my cell by force to --  
16 and was forced to walk on my broken leg.

17 Q. Who were the people that subjected you to  
18 these conditions?

19 A. The interrogators who were at that place, the  
20 same place.

21 Q. And do you know who these interrogators are,  
22 do you know their identities?

23 A. No.

24 Q. Now, during this two week period, did you ever

1 see Dr. Mitchell at Cobalt?

2 A. No.

3 Q. Did you ever see Dr. Jessen at Cobalt?

4 A. No.

5 Q. Do you have any evidence that Dr. Jessen or  
6 Dr. Mitchell even knew at that time that you  
7 were at Cobalt?

8 A. No.

9 Q. Do you have any evidence that Dr. Jessen or  
10 Dr. Mitchell knew about any of the conditions  
11 that you were being subjected to at that time?

12 A. What I know, and that is from my personal  
13 experience, is that Dr. Mitchell and  
14 Dr. Jessen were those who designed that  
15 program and has given it to others to execute  
16 and I were one of the victims for this program  
17 that has been administered.

18 Q. Mr. Soud, who told you that?

19 A. Through the passing of days and what I watched  
20 through the media and, as well, what I have  
21 read that is concerning the report of the  
22 investigations committee in the -- of the  
23 Congress. There are other evidences that the  
24 lawyers have shown me through our mutual

1 dialogue.

2 Q. What have the lawyers shown you?

3 A. That occurred between -- when there was this  
4 dialogue between me and the lawyers, the  
5 dialogue that is private to me and to them.

6 Q. What did they show you?

7 MS. SHAMSI: It might be helpful,  
8 just given, I think, concerns about privilege,  
9 for us to take a break so that I can advise  
10 Mr. Ben Soud about how he may answer this  
11 question without raising privilege issues.

12 MR. SMITH: Yeah. Let me just state  
13 for the record, to the extent that he is  
14 relying upon information that you brought to  
15 his attention that forms the factual basis for  
16 his lawsuit, I have a right to know that, even  
17 if you told him.

18 MS. SHAMSI: I agree that you have  
19 the right to know about specific documents  
20 that we have shown him, but to the extent that  
21 it goes beyond that, then I think we have some  
22 issues that --

23 MR. SMITH: That's fair.

24 MS. SHAMSI: -- I just want to

1 clarify.

2 MR. SMITH: So why don't you --  
3 we'll take a break and you see if you can work  
4 it out with him.

5 VIDEOGRAPHER: The time is 9:41.  
6 We're off the record.

7 (Brief pause.)

8 VIDEOGRAPHER: We're back on the  
9 record. The time is 9:48.

10 BY MR. SMITH:

11 Q. Mr. Soud, do you remember the question that  
12 was pending?

13 A. No.

14 Q. You said that your lawyers had shown you  
15 things. Do you remember?

16 A. Yes.

17 Q. What did they show you?

18 A. The lawyers have shown me a report by the  
19 intelligence committee at the Congress.

20 Q. Did they show you anything else?

21 A. No.

22 MR. SMITH: Let's mark this as Soud  
23 Exhibit 1.

24

1 (Whereupon, Soud Exhibit No. 1 was  
2 marked for identification.)

3 BY MR. SMITH:

4 Q. I'm going to place before you what we've  
5 marked as Soud Exhibit No. 1. Do you  
6 recognize this document, sir?

7 A. What I have seen was an Arabic copy. This is  
8 an English copy.

9 Q. Okay. And when is the last time you saw the  
10 Arabic copy?

11 A. When it was shown to me by the team of  
12 lawyers.

13 MR. SMITH: Were we provided with a  
14 copy of the Arabic copy?

15 MS. SHAMSI: I will check because  
16 this is a publicly available translation that  
17 we sent on to him. I will check. We will  
18 provide it and we will forward that to you.

19 BY MR. SMITH:

20 Q. Mr. Soud, have you reviewed the entire Arabic  
21 translation of Soud Exhibit No. 1?

22 A. Not totally, but skimming through it.

23 Q. And when were you shown this document?

24 A. I do not recall exactly.



1 Q. Was it before or after you filed the lawsuit  
2 in the United States District Court?

3 INTERPRETER: May the interpreter  
4 ask the witness to raise his voice a little  
5 bit?

6 MR. SMITH: Sure.

7 MR. ALHALABI: Mr. Smith, I believe  
8 the expression he used was "in general," not  
9 "skim through it."

10 MR. SMITH: I appreciate you  
11 bringing that to my attention. You know I  
12 have no view on that.

13 MR. ALHALABI: I understand,  
14 however, I --

15 MR. SMITH: Yeah. So let me ask my  
16 interpreter, do you agree with the ACLU's?

17 INTERPRETER: Yes. He said "I did  
18 not read it all, but like in general." Yeah.

19 MR. SMITH: Let's ask the -- let's  
20 ask the witness.

21 BY MR. SMITH:

22 Q. Mr. Soud, did you review the entire Senate  
23 report, the Arabic version of it, that's been  
24 marked as Soud Exhibit 1, or did you skim

1 through it?

2 MS. SHAMSI: Objection. You may  
3 answer.

4 THE WITNESS: I read it in a general  
5 way and not entirely.

6 BY MR. SMITH:

7 Q. Tell me what that means.

8 A. It means I did not read it page by page from  
9 its beginning to its ending, but I have read  
10 different excerpts from it.

11 Q. When did you read the Arabic version of Soud  
12 Exhibit No. 1?

13 A. I did not -- I do not remember exactly when I  
14 read it. I do not recall the date.

15 Q. Okay. Mr. Soud, your lawsuit was filed in  
16 October of 2015. Do you agree with that?

17 A. Yes.

18 Q. Had you reviewed the Arabic version of the  
19 Senate report before the lawsuit was filed?

20 A. Yes.

21 Q. Who asked you to review it?

22 A. I did not understand.

23 Q. Did the lawyers for the ACLU ask you to review  
24 this document?

1 MS. SHAMSI: Objection. You may  
2 answer.

3 THE WITNESS: Yes.

4 BY MR. SMITH:

5 Q. When did they ask you to review the document?

6 A. After I met with them.

7 Q. And were you aware that there was opposition  
8 that was written in response to what's been  
9 marked as Soud Exhibit No. 1?

10 MS. SHAMSI: Objection.

11 THE WITNESS: I don't know.

12 BY MR. SMITH:

13 Q. Did you -- did the ACLU lawyers ever ask you  
14 to review the opposition that was prepared in  
15 response to what's been marked as Soud Exhibit  
16 No. 1?

17 MS. SHAMSI: Objection. You may  
18 answer.

19 THE WITNESS: I do not know about  
20 this opposition.

21 BY MR. SMITH:

22 Q. Did you believe that everything that was  
23 contained in the Soud Exhibit No. 1 was true?

24 MS. SHAMSI: Objection.

1 THE WITNESS: I do not know about  
2 this.

3 BY MR. SMITH:

4 Q. Are you saying you don't know one way or the  
5 other if what's contained in the Senate report  
6 marked as Soud Exhibit No. 1 is true or false?

7 MS. SHAMSI: Objection.

8 THE WITNESS: All I know is this  
9 report was issued by a formal -- official  
10 governmental entity. I do not know, but what  
11 I know is that it contains correct  
12 information. This is all what I know.

13 BY MR. SMITH:

14 Q. Tell me what you mean by it contains correct  
15 information.

16 MS. SHAMSI: Objection. You may  
17 answer.

18 THE WITNESS: I mean, by it's  
19 correct, it has been issued by an entity which  
20 is an entity, a governmental and official  
21 entity, that is of considerable weight.

22 BY MR. SMITH:

23 Q. So you're saying you assumed it to be correct  
24 because it was issued by the Senate Select

1 Committee on Intelligence?

2 MS. SHAMSI: Objection. You may  
3 answer.

4 THE WITNESS: Yes.

5 BY MR. SMITH:

6 Q. Do you know what Wikipedia is?

7 A. Repeat the name.

8 Q. Wikipedia.

9 A. I don't know.

10 (Whereupon, Soud Exhibit No. 2 was  
11 marked for identification.)

12 Q. Let me show you what's been marked as Soud  
13 Exhibit No. 2. So this is in English. He  
14 won't be able to read it. Right?

15 A. No.

16 Q. Okay. Ask him if he's ever seen this  
17 document.

18 MS. SHAMSI: Objection.

19 BY MR. SMITH:

20 Q. Madam interpreter, I'm going to ask you if you  
21 will read -- well, let me identify, for the  
22 record, Soud Exhibit No. 2 is a copy of what's  
23 contained on the -- on Wikipedia describing  
24 the Libyan Islamic Fighting Group. The

1 document bears a print date of 1-31, 2017.

2 MS. SHAMSI: Before you ask your  
3 question, Jim, just so that there's no  
4 question pending, I just want the record to  
5 reflect that he's got an English language  
6 document in front of him.

7 MR. SMITH: He does.

8 BY MR. SMITH:

9 Q. I want you to, madam interpreter, please  
10 transfer (sic) the first paragraph of Soud  
11 Exhibit No. 2. And what I would like you to  
12 do is after -- what I would like you to do is  
13 -- in fact, let's do it this way: In the  
14 first paragraph, the question is, quote -- do  
15 you see where it says, quote: "The Libyan  
16 Islamic Fighting Group (LIFG) also known as  
17 Al-Jama'a al-Islamiyyah al-Muqatilah bi-Libya  
18 (Arabic)," and then there's some Arabic  
19 description, "was an armed Islamic group."

20 Let me stop right there. Do you see  
21 where it says that? Ask him that question.

22 (Translation.)

23 MS. SHAMSI: Objection. Can I just  
24 ask for clarification, did you just read the

1 first sentence or more than that?

2 INTERPRETER: I read, actually, till  
3 the yellow marked part.

4 MR. SMITH: Okay. I only wanted you  
5 to read the first sentence.

6 INTERPRETER: Oh, the first  
7 sentence. May the interpreter just repeat  
8 what is there.

9 (Translation.)

10 INTERPRETER: That is it.

11 BY MR. SMITH:

12 Q. The question is, do you see that?

13 MS. SHAMSI: Objection.

14 THE WITNESS: I did not see this  
15 document. What I see is the English copy.

16 BY MR. SMITH:

17 Q. I understand. Do you see, now, the first  
18 sentence in that paragraph as it was  
19 translated by the interpreter today?

20 MS. SHAMSI: Objection.

21 THE WITNESS: Yes, I see.

22 MR. SMITH: Do you understand --

23 MS. SHAMSI: I'm going to --

24 MR. SMITH: -- the translation --

1 MS. SHAMSI: -- just clarify here  
2 which is that what he's looking at is an  
3 English language document.

4 MR. SMITH: Hina, I've been letting  
5 you get away with this, but it's got to stop  
6 now. Okay. He knows it's in English  
7 language. You don't need to clarify. It's  
8 already on the record and I'm going to ask you  
9 to stop it.

10 MS. SHAMSI: I'm not clarifying for  
11 him.

12 MR. SMITH: Okay.

13 MS. SHAMSI: I'm clarifying for the  
14 record.

15 MR. SMITH: The record's all -- you  
16 can't just pipe up and say those things.  
17 Okay. I mean, I've been very good about this,  
18 but at a certain point, it's enough already.

19 MS. SHAMSI: Jim, you can absolutely  
20 ask about this document.

21 MR. SMITH: I know I can.

22 MS. SHAMSI: That's not what I'm  
23 taking about.

24 MR. SMITH: I'm not asking for your



1 permission. You're interrupting me and you're  
2 interrupting the witness and we don't have  
3 days to do this.

4 MS. SHAMSI: I get that. And I'm  
5 just asking the record to reflect what's  
6 written and that there is translation. That's  
7 it.

8 MR. SMITH: But it already is on the  
9 record.

10 MS. SHAMSI: That's fine.

11 BY MR. SMITH:

12 Q. Okay. Let's go back. Does the witness  
13 understand that there is a question before  
14 him?

15 A. Please, repeat the question.

16 Q. Sure. Ask the witness, direct his attention  
17 to the first sentence of the first paragraph,  
18 and ask him, after you translate it, does he  
19 see that and does he understand it in Arabic.

20 (Translation.)

21 INTERPRETER: Up till here, right?

22 MR. SMITH: First sentence.

23 INTERPRETER: Yeah.

24 THE WITNESS: Yes.

1 BY MR. SMITH:

2 Q. Is that true?

3 A. Correct.

4 Q. Now, go to the last sentence, where it says:

5 "Alleged militants include alleged Al-Qaeda  
6 organizer Abd al-Muhsin al-Libi who now holds  
7 a key command position in the Libya Shield  
8 Force."

9 A. I do not know about these words.

10 Q. Do you know an individual by the name of Abd  
11 al-Muhsin al-Libi?

12 A. Yes.

13 Q. How do you know him?

14 A. I know that he is a Libyan person. He was in  
15 Pakistan and now he is in Libya, and that he  
16 is not on the top of any militant -- any  
17 militant force in Libya.

18 Q. Is he or was he one of your leaders of the  
19 LIFG?

20 MS. SHAMSI: Objection. You may  
21 answer.

22 THE WITNESS: I didn't know that  
23 this person was a leader. I didn't have any  
24 affiliation with this person and he was not a

1 leader.

2 BY MR. SMITH:

3 Q. Was he part of LIFG?

4 A. Yes.

5 Q. Was he also an organizer of Al-Qaeda?

6 MS. SHAMSI: Objection. You may  
7 answer.

8 THE WITNESS: I don't know. I don't  
9 know that.

10 BY MR. SMITH:

11 Q. Okay. Turn to the second page, please. Are  
12 you familiar with Abdelhakim Belhadj?

13 A. Yes.

14 Q. Is he the person who you told me about  
15 yesterday?

16 A. Yes.

17 Q. Is he also known as Abu Abdullah al-Sadiq?

18 A. Yes.

19 Q. And was Belhadj also affiliated with Al-Qaeda?

20 A. No, he was not affiliated to Al-Qaeda.

21 Q. How do you know that?

22 A. Because he is one of the first tiers of  
23 leaders in LIFG and I know that he was not a  
24 member of Al-Qaeda and I know that he did not

1 have an affiliation with Al-Qaeda.

2 Q. And how do you know that?

3 A. Through direct discourse between him and me.

4 Q. Did you ask him?

5 A. Yes.

6 Q. Why did you ask him?

7 A. I asked him to know whether the Jama'a  
8 (phonetic) has thought about joining Al-Qaeda  
9 or thought about -- about being affiliated  
10 with Al-Qaeda, because I -- he said that he  
11 never, for one single moment, thought of  
12 joining Al-Qaeda and/or being affiliated with  
13 Al-Qaeda and because the LIFG has its own  
14 particular goal that it's still pursuing up  
15 till now.

16 Q. Now, Mr. Soud, you said that Drs. Mitchell and  
17 Jessen prepared a program that was used on  
18 you. Do you remember that?

19 A. Yes.

20 Q. Tell me what you understand that program to  
21 be.

22 A. My understanding for this was through my  
23 personal experience that I led while -- during  
24 my life in prison.

1 Q. Tell me, in as much detail as you understand,  
2 what the specifics were of Dr. Mitchell's and  
3 Dr. Jessen's alleged program.

4 A. What I understand about this program that was  
5 designed and applied on me, that it was -- its  
6 aim was to make me arrive -- or make me reach  
7 the point of despair and constant fear, shock,  
8 collapse and feeling degraded and feeling  
9 inhuman, to feel -- to make me feel that my  
10 will is broke -- to break the will, to make my  
11 spirit and emotions collapse, to make me wish  
12 to die, to prevent me from optimism.

13 Q. Are you finished?

14 A. Yes.

15 Q. Now, do you -- what is your understanding of  
16 the specifics of this program that you contend  
17 was designed by Drs. Mitchell and Jessen that  
18 would make you feel the way you described?

19 A. Through what has been applied on me  
20 personally, through what I have gone through  
21 at the prison of Cobalt, what I have lived and  
22 gone through and all what I have told you that  
23 happened to me personally, and that was the  
24 design.

1 Q. Mr. Soud, are you saying that everything that  
2 happened to you while you were at Cobalt was  
3 part of the program that was designed by  
4 Drs. Mitchell and Jessen?

5 A. Yes.

6 Q. Who told you that?

7 A. Through my personal experience, through the  
8 real life that I led.

9 Q. Here's what I'm trying to understand, sir,  
10 what is the basis for your belief that  
11 everything that happened to you at Cobalt was  
12 the result of a program designed by  
13 Drs. Mitchell and Jessen?

14 A. This is through the real experience I led in  
15 Cobalt where I passed -- where there were  
16 different stages, different methods, different  
17 tools, that made -- that built my conviction  
18 that all what has been done by the hands of  
19 those who did it was in accordance with what  
20 was contained in this -- in this theory of  
21 Mitchell and Jessen.

22 Q. So the basis for your belief that everything  
23 that was done to you while detained at Cobalt  
24 was part of a program designed by

1 Drs. Mitchell and Jessen is your own personal  
2 opinion?

3 A. This is my personal conviction.

4 Q. Okay. Do you have any factual information to  
5 conclude that Drs. Jessen or Mitchell gave any  
6 specific instructions to take any actions  
7 against you while you were detained at Cobalt?

8 A. I do not have anything, any of -- such a  
9 thing. I just knew that the program has been  
10 applied on me and, as I told you, that was  
11 prepared by Dr. Mitchell and Jessen.

12 Q. I'm going to strike the part of the answer  
13 that's nonresponsive.

14 Mr. Soud, what is the basis for your  
15 belief that forcing you to walk on a broken  
16 leg was part of the program designed by  
17 Drs. Mitchell and Jessen?

18 A. My belief is that if there isn't a direct  
19 connection between what Dr. Mitchell and  
20 Jessen have prepared with the injury in my  
21 leg, a direct connection, but what has been  
22 applied on me for the time that I was there in  
23 the prison of Cobalt concerning no health  
24 care, concerning hurting my leg deliberately

1 through standing -- being forced standing up  
2 on it or forcing me to walk, using it, and  
3 with no medical care, that was in accordance  
4 to what Dr. Mitchell and Jessen had prepared.

5 Q. What is the basis for your belief that  
6 Dr. Jessen's and Dr. Mitchell's alleged  
7 program included forcing you to walk on a  
8 broken leg?

9 A. I did not understand the beginning of the  
10 question. If you would repeat.

11 Q. Let me go about it -- let me go about it a  
12 different way. Mr. Soud, so you understand,  
13 I'm not challenging that these things happened  
14 to you. Do you understand that?

15 A. (Translation.)

16 Q. Do you understand that? And I'm not agreeing  
17 that they happened or disagreeing. Do you  
18 understand that?

19 A. Yes. I understand.

20 Q. What I'm trying to understand is why you  
21 believe that Jessen and Mitchell had anything  
22 to do with it. Do you understand that?

23 A. (Translation.)

24 Q. Do you understand?



1 A. Yes.

2 Q. Now, the people who did these things to you  
3 were not Jessen and Mitchell, correct?

4 A. Yes.

5 Q. How do you know that the people who did these  
6 things to you were not acting on the orders of  
7 the CIA, completely unrelated to anything  
8 concerning Jessen and Mitchell?

9 MS. SHAMSI: Objection. You may  
10 answer.

11 THE WITNESS: All what I know is  
12 that what Dr. Mitchell has prepared was handed  
13 down to other people to be implemented and  
14 that I was one of those victims of this  
15 program.

16 BY MR. SMITH:

17 Q. What do you believe was handed down by  
18 Dr. Mitchell?

19 A. That was through my personal experience and  
20 following with the media, I knew that -- it  
21 came to my knowledge that what was applied was  
22 this program designed by Dr. Mitchell and it  
23 was applied by others.

24 Q. Now, do you know if Dr. Mitchell gave any

1           advice on how detainees should be treated at  
2           Cobalt?

3       A.    I do not know precisely.

4       Q.    Is it your testimony, sir, that hanging you by  
5           your hands for long periods of time was part  
6           of Dr. Mitchell's and Dr. Jessen's program?

7       A.    Yes.  I knew later from -- that it was the  
8           program of -- it was from the program of  
9           Dr. Mitchell.

10      Q.    Who told you that?

11      A.    I knew this through following with the media.

12      Q.    And what particular article or news report  
13           were you relying upon to come to this  
14           conclusion?

15      A.    Through following the BBC and Al Jazeera, I --  
16           I -- it was mentioned that this program was --  
17           it was mentioned about the program that was  
18           prepared by Dr. Mitchell which has been  
19           applied on the prisoners, and I have  
20           discovered that this is the same program that  
21           has been applied on me.

22      Q.    Now, let me go back to -- you said there were  
23           three stages while you were at Cobalt.  Can  
24           you describe for me stage two?

1 A. After the end of the first stage, the head of  
2 interrogators came and told me that there  
3 would be a new interrogation and adopting  
4 methods more severe and more hard and in --  
5 and, actually, the second group adopted that  
6 for three weeks, and it was more cruel and  
7 more fierce.

8 Q. What was done to you during these three weeks?

9 A. During these three weeks that were the worst  
10 of all in Cobalt, I was shackled, hands and  
11 legs. I was being chained to a ring in the  
12 wall. The loud music, the very loud music  
13 continued. Food deprivation. No care for  
14 cleanliness. I was -- the darkness.

15 They started to use new methods,  
16 including throwing me against the wall,  
17 torture by pouring icy water, slamming,  
18 punching, holding the jaw forcibly, insults,  
19 throwing insults, forcing me to walk, to walk  
20 on my -- using my leg, and being hanged by the  
21 hands.

22 Q. Do you have any evidence that either  
23 Dr. Jessen or Dr. Mitchell was aware of these  
24 events when they occurred?

1 A. I don't know.

2 Q. Now, can you describe for me, sir, the third  
3 stage?

4 A. The third stage, I -- which continued during  
5 all the period I have stayed in the prison,  
6 shackling was decreased. There was light, a  
7 faint light in the room, in the cell. Then, I  
8 was allowed to shower and to change my  
9 clothes. And the interrogations continued  
10 continuously. And shackling was only  
11 administered to one hand and attached to the  
12 wall. And loud music continued. And  
13 disruption, continuous disruption, continued  
14 from the guards, on the hour.

15 Q. Can you describe for me the disruption that  
16 you made reference to?

17 A. Disruption meaning banging on the door to wake  
18 me up and I have to stand up and I was forced  
19 to do so so they can make sure that I have  
20 already been awake, and that continued for --  
21 on the top -- on the top of each hour, nearly  
22 on the top of each hour.

23 Q. And how long did that continue?

24 A. That condition continued all the time that I

1 had been there.

2 Q. Now, during the period of time that you  
3 experienced these conditions in what you refer  
4 to as stage three, do you have any evidence  
5 that Dr. Mitchell or Dr. Jessen knew anything  
6 about it?

7 A. As I have mentioned and I told you, that all  
8 these that I have gone through, which I named  
9 stage three, all that was prepared by  
10 Dr. Mitchell and his companion.

11 Q. I'm going to move to strike your answer as  
12 nonresponsive.

13 Do you have any evidence that  
14 Dr. Mitchell or Dr. Jessen was aware of the  
15 conditions that you experienced during stage  
16 three, as you described it?

17 A. I don't know.

18 Q. Now, what happened after stage three?

19 A. I was transferred to another place. I was  
20 transferred on April the 25th with -- or after  
21 very degrading and humiliating procedures,  
22 including being naked, manipulation of sexual  
23 organs and degrading to my pride and dignity,  
24 being forced to be naked and putting a diaper

1 on me, forcing me to wear short clothes,  
2 closing my eyes, my ears with a band or  
3 adhesive band, and I was hooded, and my hands  
4 and my legs were shackled, my hand was  
5 shackled to my abdomen, and that continued  
6 till I left this place to another place by  
7 plane.

8 Q. Now, you said that there was manipulation of  
9 your sexual organs. Do you recall that?

10 A. Yes.

11 Q. When did that happen to you?

12 A. More than once. Three times -- more than  
13 three times. The first time when I was handed  
14 by the Pakistani police to the CIA and I was  
15 made -- I was shifted to Cobalt.

16 The second time, when I went to the  
17 new place, after Cobalt, and the other place.

18 The third time, when entering the  
19 new place.

20 The fourth time, when I was shipped  
21 to Libya.

22 The fifth time, when the doctors for  
23 more than one time were administering checks,  
24 imaginary checks on me, and the purpose was to

1           inflict humiliation and degradation on me.

2       Q.    So there were five times that you claim that  
3           there was manipulation of your sexual organs,  
4           sir?

5       A.    Yes.

6       Q.    And was the manipulation always the same?

7       A.    It would differ.  When we were transferred,  
8           yes, it was followed by -- at the same manner.  
9           When we moved to a new place, doctors were  
10          administering that while they were laughing  
11          and joking and did that to our sexual organs.

12      Q.    What did the doctors do to you?

13      A.    The doctors made unreal checks, checkups, and  
14          that was surrounded by jokes and laughs and  
15          making fun, yes.

16      Q.    Do you contend that that was part of this  
17          program?

18      A.    My conviction is that all what I have been  
19          through in Cobalt was a part of this program.

20      Q.    So this sexual manipulation over these five  
21          occasions that you described, sir, is it your  
22          testimony that it's your personal opinion that  
23          this was part of this alleged program designed  
24          by Drs. Jessen and Dr. Mitchell?

1 MS. SHAMSI: Objection. You may  
2 answer.

3 THE WITNESS: This is what I  
4 believe, yeah.

5 MS. SHAMSI: Jim, if you are going  
6 to go on to a different topic, let's take a  
7 brief break.

8 MR. SMITH: Okay. Okay. Let's stop  
9 now, take a break.

10 VIDEOGRAPHER: The time is eleven  
11 o'clock. We're off the record.

12 (Brief pause.)

13 VIDEOGRAPHER: Back on the record.  
14 The time is 11:21.

15 BY MR. SMITH:

16 Q. Are you ready to proceed?

17 A. Yes.

18 Q. Mr. Soud, did you break your leg while you  
19 were in Cobalt?

20 A. No.

21 Q. So the reference that you made to a broken  
22 leg, was that the injury that you sustained  
23 when you were shot by the Pakistani police?

24 A. Yes.



1 Q. Okay. All right. Now, do you know, when you  
2 left Cobalt, do you know where you were taken  
3 to?

4 A. I don't know.

5 Q. But you were taken to another place where you  
6 were detained?

7 A. Yes.

8 Q. And who was the person or what was the  
9 government that was in charge of this  
10 facility, do you know?

11 A. CIA.

12 Q. And you were taken there by plane?

13 A. Yes.

14 Q. With others?

15 A. Yes.

16 Q. Who went with you?

17 A. Only what I have known was Khalid al-Sharif.

18 Q. Was? I'm sorry.

19 A. Khalid al-Sharif.

20 Q. Sharif. Okay.

21 Now, how long were you detained at  
22 this facility?

23 A. Nearly four months.

24 Q. Can you describe for me the conditions of your

1           detainment during these four months?

2       A.    As soon as we arrived to this place, I was  
3           made to stand up inside a huge hall and the  
4           shackles were undone. My clothes were ripped  
5           till I became stark naked. Some of the men  
6           and the women were aware -- standing there,  
7           were watching my body and my private parts. I  
8           was being photographed by a camera. My  
9           private parts were photographed by a camera.

10                    I was taken to a room where he --  
11           where the doctor introduced himself at that  
12           place while I was naked. He examined me and  
13           manipulated my sexual organs among jokes and  
14           making fun of that.

15                    Then, I was taken to my cell and I  
16           was shackled by my leg and I stayed bare  
17           naked.

18       Q.    And during the four months that you were  
19           there, did you remain naked?

20       A.    After a few days, they brought me clothes, and  
21           I stayed in the iron shackles for four months.

22       Q.    Okay. Were you interrogated during those four  
23           months?

24       A.    Yes, I was interrogated.

1 Q. How many times?

2 A. Several times.

3 Q. How frequently in the four months were you  
4 interrogated?

5 A. A repetition, what is?

6 INTERPRETER: May the interpreter  
7 repeat?

8 MR. SMITH: Yes.

9 (Translation.)

10 (Construction noise in background.)

11 THE WITNESS: This noise is causing  
12 disruption.

13 MR. SMITH: I think it's a sander or  
14 something, they're sanding the steps.

15 THE WITNESS: I was interrogated  
16 several times. I don't know exactly how many  
17 times, but I was interrogated several times.

18 BY MR. SMITH:

19 Q. Were you subjected to any of the conditions  
20 that you described in stage one at Cobalt?

21 A. No.

22 Q. Were you subjected to any of the conditions  
23 that you described in stage two at Cobalt?

24 A. No. Only at stage two, I was shackled by the

1 leg and there was no -- there wasn't any of  
2 those that were at the first stage.

3 Q. And what about stage three at Cobalt, were you  
4 subjected to any of the conditions that you  
5 described as stage three at Cobalt while you  
6 were detained for these four months?

7 A. It was the loud music that continued,  
8 shackling, darkness, a continuous  
9 interrogation, that continued.

10 Q. And is it your contention that the conditions  
11 that you were exposed to during these four  
12 months were part of this program prepared by  
13 Drs. Mitchell and Jessen?

14 A. I don't think.

15 Q. Why don't you think?

16 A. Because I did not suffer -- I was not exposed  
17 to those methods of torture that I was exposed  
18 to in Cobalt.

19 Q. So who do you think was making the decisions  
20 about your treatment while you were at this  
21 facility for four months?

22 A. It's those with whom I was detained. I was  
23 detained by the CIA.

24 Q. So at least during this period of four months,

1           you think that the CIA was making decisions  
2           without any input from Drs. Mitchell and  
3           Jessen, is that correct?

4                   MS. SHAMSI:  Objection.  You may  
5           answer.

6                   THE WITNESS:  I don't know whether  
7           there was any communication between the CIA  
8           and Dr. Mitchell or there was any  
9           coordination, I don't know.

10          BY MR. SMITH:

11          Q.    You have no evidence of any communication or  
12                coordination, isn't that correct?

13                   MS. SHAMSI:  Objection.  You may  
14           answer.

15                   THE WITNESS:  I don't know.

16          BY MR. SMITH:

17          Q.    Okay.  Now, after these four months, sometime  
18                in August of 2004, you were moved from this  
19                facility, is that correct?

20          A.    Yes.

21          Q.    And you were turned over to Libyan  
22                authorities?

23          A.    Yes.  I was handed over to the Gaddafi regime,  
24                yes.

1 Q. And that was in August of 2004?

2 A. Yes.

3 Q. Who made the decision to release you to the  
4 Libyan authorities?

5 A. I was not released. I was handed over to the  
6 Gaddafi regime to go into Gaddafi prisons and  
7 I don't know who took the decision.

8 Q. Do you have any evidence that Dr. Jessen or  
9 Dr. Mitchell was in any way involved in the  
10 decision to hand you over to the Libyan  
11 authorities?

12 A. I don't know.

13 Q. Do you have any evidence that Dr. Mitchell or  
14 Dr. Jessen even knew that you had been turned  
15 over to the Gaddafi regime?

16 A. I don't know.

17 Q. So what happened to you after you were turned  
18 over to the Libyan officials?

19 A. One of the days, someone who were -- who was  
20 there in that place came and the guards took  
21 me forcibly and very cruelly and they started  
22 to -- they started the proceed -- the process  
23 where they cut, ripped my clothes, till I  
24 became naked, totally naked, and they dressed

1 me in other clothes and took me to a car.

2 The car started to move erratically,  
3 very quickly, very fast, then stopped, then  
4 very fast, then stopped, till I got dizzy and  
5 I threw up.

6 Then, I was taken to what we call a  
7 container. Then, the proceeds for travel  
8 started with ripping my clothes till I became  
9 completely bare, and shackles were put to my  
10 hands and my legs, and my eyes were blinded  
11 and my ears, and I was hooded.

12 I was forcibly shoved to the plane  
13 ladder, steps. They made me sit on one of the  
14 seats in the plane, then the plane took off,  
15 and after a long time, the duration of the  
16 journey, we reached another place.

17 MS. SHAMSI: Jim, Bashar is raising  
18 his hand.

19 MR. ALHALABI: Jim.

20 MR. SMITH: Yes.

21 MR. ALHALABI: Also, I was shackled  
22 to the seat.

23 INTERPRETER: Okay. Omission by the  
24 interpreter for "I was shackled to the seat on

1 the plane."

2 (Translation.)

3 BY MR. SMITH:

4 Q. Where did the plane land?

5 A. The plane landed in an airport. After that,  
6 after a short while of that, I learned that  
7 this place was one of the Libyan airports.

8 Q. And then what happened when you got off the  
9 plane?

10 A. We were handed over to the Libyan intelligence  
11 and immediately myself and two others were  
12 shoved in a car, in the back hatch, the back  
13 hatch of a car, and -- of one of the cars.  
14 After that, I was transferred to another  
15 place. I learned after that that this was the  
16 prison of Tajora.

17 Q. Spell that, please.

18 INTERPRETER: T-A-J-O-R-A. Tajora.

19 THE WITNESS: Tajora.

20 INTERPRETER: Tajora. T-A-J-O-R-A.

21 BY MR. SMITH:

22 Q. Mr. Soud, at the time that you landed on that  
23 plane in Libya, did you still have the present  
24 intention and desire to kill Gaddafi and



1 anyone associated with his regime?

2 MS. SHAMSI: Objection. You may  
3 answer.

4 THE WITNESS: Up till that time, the  
5 moment that I stepped down in Libya, and still  
6 my affiliation is to the LIFG, which aims at  
7 overturning Gaddafi and his regime.

8 BY MR. SMITH:

9 Q. Mr. Soud, did you still have the present  
10 intention when you landed that day in Libya to  
11 kill Gaddafi and members of his regime?

12 MS. SHAMSI: Objection. You may  
13 answer.

14 THE WITNESS: Yes.

15 BY MR. SMITH:

16 Q. Would you have killed him that day if you had  
17 the opportunity?

18 A. Gaddafi, yes.

19 Q. Now, how long did you remain in the prison  
20 Tajora?

21 A. Several months.

22 Q. Several months?

23 A. Several months.

24 Q. Okay. When were you moved from Tajora?

1 A. I was transferred from Tajora in 2005, by the  
2 end of 2005.

3 MR. SMITH: So let's take a break so  
4 we can order.

5 VIDEOGRAPHER: The time is 11:48.  
6 We're off the record.

7 (Brief pause.)

8 VIDEOGRAPHER: Back on the record.  
9 The time is 12:03.

10 BY MR. SMITH:

11 Q. Mr. Soud, could you describe for me the  
12 conditions that you experienced while you were  
13 in prison at Tajora?

14 A. I went through constant interrogation,  
15 solitary confinement, and the Libyan  
16 intelligence, personnel, told me that this  
17 place belongs to the Libyan intelligence and  
18 that Moussa Koussa was the head.

19 Q. Were you beaten?

20 A. In this place, no.

21 Q. Can you describe the circumstances of your  
22 solitary confinement?

23 A. I was in a solitary confinement. I was taken  
24 to interrogation repeatedly, nearly every day.

1 I was given three meals a day. I used to get  
2 out to the sun twice a week.

3 There was a visit -- I was able to  
4 get a visit from my wife and my mother, that  
5 was about one week since my arrival. Of  
6 course, my wife didn't have any news about me  
7 for a very long time and she had thought that  
8 I might have died because she heard that  
9 shooting that happened when they arrested me.

10 I got to know my daughter, who was,  
11 when I left her, her age was nine months.  
12 Unfortunately, at that time of the visit, she  
13 could not recognize me.

14 Q. Can you describe the circumstances of these  
15 daily interrogations while you were held at  
16 Tajora?

17 A. The interrogation was that in the morning, I  
18 would get out of my room, I would go to the  
19 room of the interrogator, the interrogation,  
20 up till lunch time, where I would go back to  
21 my room and I would take my lunch and I would  
22 perform my prayer, and we could go back at the  
23 time of Allah's of the prayer.

24 Q. What were you interrogated about?

1 A. Everything that is in relation with my  
2 connection with the LIFG, questioning about  
3 the activities of the LIFG, questions about  
4 the persons belonging to the LIFG, call every  
5 person who was -- what was his role.

6 Q. Did you answer the questions truthfully?

7 A. Yes.

8 Q. Why?

9 A. The Libyan intelligence, at that time, has  
10 gained a lot of information that themselves  
11 have told me that they have come to know most  
12 of the activities of the persons and the  
13 activities of the LIFG and information about  
14 all what they were doing.

15 Q. Now, during these interrogations, were you  
16 touched in any way?

17 A. No. At that time, no.

18 Q. And at the end of 2005, where were you  
19 transferred to?

20 A. I was taken to a new prison that was called  
21 Ain Zara. A-I-N, Z-A-R-A. And I stayed there  
22 up till 2006.

23 Q. Can you describe the conditions that you  
24 encountered at the prison Ain Zara?

1 A. That place belongs to the ministry, the Libyan  
2 ministry of interior, or what is known as the  
3 Department of National Security or internal  
4 security. Sorry, internal security.

5 I went to several interrogations.  
6 In this place, too, I received beatings  
7 several times. That went on for several  
8 periods, till I was transferred in the month  
9 of -- the fourth month, about, to a prison  
10 called "Abu Salim."

11 Q. Spell that, please.

12 A. A-B-U. S-A-L-I-M.

13 Q. So April of 2006, you were transferred to Abu  
14 Salim?

15 A. Yes.

16 Q. Now, while you were at Ain Zara, how  
17 frequently were you beaten by Libyan  
18 authorities?

19 A. Several times.

20 Q. Was it during interrogations that you would  
21 get these beatings?

22 A. Yes.

23 Q. How frequently were you interrogated while you  
24 were at that facility?

1 A. I cannot recall exactly. Several times.

2 Q. When you say several times, are you suggesting  
3 to us that you were only interrogated two or  
4 three times during the entire period of time  
5 that you were there?

6 MS. SHAMSI: Objection.

7 THE WITNESS: Nearly, over five  
8 times.

9 BY MR. SMITH:

10 Q. And were you beaten every time that you were  
11 interrogated?

12 A. No.

13 Q. How many times were you beaten?

14 A. About three to four times.

15 Q. Can you describe for us the manner in which  
16 you were beaten by these Libyan officials?

17 A. Slapping, punching or slapping shoulders and  
18 back, using cudgels or sticks in beatings, on  
19 and off beatings, using some plastic pipes in  
20 the beatings, indiscriminate beatings. Yes.

21 Q. Did they -- did these beatings cause you  
22 injury?

23 A. No.

24 Q. Did they ever hit you in the head with a

1 stick?

2 A. No.

3 Q. Did they ever draw blood?

4 A. No.

5 Q. What were the circumstances of your  
6 confinement while you were at Ain Zara?

7 A. I stayed in the solitary confinement nearly --  
8 about two to three months. After that, I was  
9 transferred to the collective prison.

10 MR. ALHALABI: That would be the  
11 public area in the prison.

12 INTERPRETER: Public.

13 MR. ALHALABI: The public prison.

14 INTERPRETER: Public prison.

15 BY MR. SMITH:

16 Q. When you were in solitary confinement, were  
17 you kept in darkness?

18 A. No.

19 Q. Did you sustain any bodily injuries while you  
20 were maintained as a prisoner at Ain Zara?

21 A. No.

22 Q. Did you sustain any bodily injuries when you  
23 were a prisoner at Tajora?

24 A. No.

1 Q. Did you sustain any bodily injuries while you  
2 were held as a prisoner at Cobalt?

3 A. Yes.

4 Q. What bodily injuries did you sustain at  
5 Cobalt?

6 A. An injury to my leg while I was water  
7 tortured. One of the guards stood over my leg  
8 which caused me to suffer from an injury  
9 because of the iron shackle.

10 Q. Any other bodily injuries while you were a  
11 prisoner at Cobalt?

12 A. No.

13 INTERPRETER: May the interpreter  
14 make a clarification?

15 MR. SMITH: Sure.

16 INTERPRETER: It was said that one  
17 of the guards stood over my leg. Sometimes,  
18 in Arabic, it's said leg, which means foot, or  
19 it could mean, still, leg.

20 MR. ALHALABI: Absolutely true.

21 Also, it caused a cut. Not an  
22 injury, a cut.

23 (Translation discussion.)

24 BY MR. SMITH:



1 Q. Can someone tell me what the witness is  
2 saying?

3 A. As well, a mark about the -- it caused me an  
4 injury to my leg or foot. It could be a cut.  
5 Then, there was an addition that caused blood  
6 to gush out of my foot. So it's a cut.

7 Q. So the bodily injury that you told us about at  
8 Cobalt was a cut to your foot, Mr. Soud?

9 A. It was because of the iron shackle. So when  
10 the guard stood over the iron shackle that was  
11 on my foot, I suffered from an injury. It was  
12 not a cut, it was an internal injury.

13 MR. ALHALABI: Did not say  
14 "internal."

15 INTERPRETER: Yeah. I mean --

16 MR. ALHALABI: Okay. When you say  
17 -- I'm sorry. Can I explain? When you say "a  
18 cut," it was perceived as a complete cut, like  
19 when you cut something.

20 Now, in English, a cut is when you,  
21 basically, cut your skin. The skin broke, if  
22 you would. So I believe that's what's going  
23 on.

24 You may clarify.

1 INTERPRETER: The interpreter  
2 understood that it was not an apparent cut,  
3 but it was like a dig into the flesh of the  
4 skin. We can ask the -- the interpreter would  
5 like to ask for a clarification, please.

6 MR. SMITH: Sure.

7 (Translation discussion.)

8 THE WITNESS: It was a cut that  
9 blood gushed out of it.

10 BY MR. SMITH:

11 Q. All right. Did you sustain any bodily  
12 injuries while you were maintained as a  
13 prisoner in the other facility after you left  
14 Cobalt?

15 A. No.

16 Q. Now, in 2006, April of 2006, you were  
17 transferred to another prison in Libya called  
18 "Abu Salim"?

19 A. Yes.

20 Q. How long did you stay there?

21 A. Till I was released from prison in 2011.

22 Q. When in 2011 were you released?

23 A. January.

24 Q. So you were a prisoner for almost five years

1 at Abu Salim?

2 A. Yes.

3 Q. Before we break, where do you live presently,  
4 Mr. Soud?

5 A. In the city of Misrata.

6 Q. Could you spell that, please.

7 INTERPRETER: M-O-U-S-T-R-A-T-A.

8 (Sic.)

9 Q. And where is that?

10 A. It is a city, Misrata is a city that is  
11 located in the western/northern part, and it's  
12 by the seaside, which is a way, 200 kilometers  
13 to the west -- no, to the east from Tripoli.

14 Q. How long have you lived there?

15 A. I lived since I was released up till today.

16 Q. And who pays for your -- your expenses  
17 associated with living there?

18 A. I live in a house with my mother and I work.  
19 As I have mentioned to you, I work at one of  
20 the companies.

21 Q. Okay. What's the name of the company that you  
22 work at?

23 A. Tibisti Company for alabaster and granite.

24 Q. Spell it, please.

1 (Translation discussion.)

2 INTERPRETER: T-I-B-I-T-S-I (sic),

3 Tibisti. T-I-B --

4 Q. And that company is located in Misrata?

5 INTERPRETER: -- S-I-T-I (sic).

6 A. Yes.

7 Q. And your wife and your children live at the  
8 same house with you?

9 A. Yes.

10 Q. And your mother owns the home?

11 A. Yes.

12 MR. SMITH: Okay. I see that it's  
13 12:30 and we said that we would break for your  
14 prayers at 12:30, and then you're going to  
15 meet with the doctor and you're going to have  
16 some lunch. So let's go off the record.

17 VIDEOGRAPHER: The time is 12:30.

18 We're off the record.

19 \* \* \* \* \*

20 AFTERNOON SESSION

21 \* \* \* \* \*

22 VIDEOGRAPHER: We're back on the  
23 record. The time is 2:30.

24 BY MR. SMITH:

1 Q. Good afternoon, Mr. Soud.

2 Mr. Soud, we've been down here in  
3 Dominica, now, taking your deposition and  
4 during the course of it and before it,  
5 actually, three different doctors performed  
6 examinations on you.

7 You're, obviously, aware of that,  
8 right?

9 A. Yes.

10 Q. Today, you met with Dr. Zuckerman, is that  
11 right?

12 A. Yes.

13 Q. And did he treat you fairly?

14 A. Yes.

15 Q. And was there anything that he did during the  
16 course of his examination that you found  
17 objectionable?

18 A. (Translation.)

19 Q. Several days ago --

20 A. No.

21 Q. Thank you.

22 Several days ago, Mr. Soud, you met  
23 with Dr. Pitman, who also spent time with you  
24 and did an examination. Do you recall that?

1 A. Yes.

2 Q. Did he treat you fairly?

3 A. Yes.

4 Q. Was there anything that he did that you found  
5 objectionable?

6 A. He asked me why have you been detained and why  
7 did the CIA took that action towards you.

8 And, to me, I thought that these questions  
9 were further to the profession that he was  
10 practicing, yes.

11 Q. And did you find those questions  
12 objectionable?

13 A. Yes. I answered those questions, but for me,  
14 they were objectionable.

15 Q. Okay. Was there anything else other than  
16 those two questions that you found  
17 objectionable?

18 A. No.

19 Q. And before you met with Dr. Pitman, you met  
20 with Dr. Carter, is that correct?

21 A. Yes.

22 Q. And was there anything that Dr. Carter did  
23 that you found objectionable?

24 A. No.

1 Q. And did Dr. Carter treat you fairly?

2 A. Yes.

3 Q. Now, just before the lunch break, we were at  
4 the point where you had been transferred from  
5 the prison facility Ain Zara to Abu Salim. Do  
6 you recall that?

7 A. Yes.

8 Q. And I think you testified that you were there  
9 -- you were held there in that Libyan prison a  
10 little less than five years, is that right?

11 A. Yes.

12 Q. And can you describe for me the conditions  
13 under which you were imprisoned at Abu Salim?

14 A. When I was transferred to that prison, then, I  
15 was -- I stood before the court. And after  
16 five months, there was a judgment from the  
17 court that was passed very quickly on the  
18 seventh month and at that court, thus, I did  
19 not receive a fair trial and I was prevented  
20 from retaining a lawyer.

21 MR. ALHALABI: Jim. Sorry. He  
22 didn't say the trial lasted five months. He  
23 said "I was taken to court on the fifth month  
24 and the decision came on the seventh month."

1 INTERPRETER: Okay. Yeah.

2 MR. SMITH: Okay.

3 BY MR. SMITH:

4 Q. Now, Mr. Soud, I'm not asking about your trial  
5 in Libya. I'm focused on the conditions of  
6 your confinement in the prison called "Abu  
7 Salim." Are you with me?

8 A. Yes.

9 Q. Now, were you -- were you kept in solitary  
10 confinement?

11 A. There was the collective prison, it was like a  
12 public prison. There were five open rooms,  
13 all of the rooms were leading to each other.  
14 I used to receive meals in this facility. The  
15 meals were three times a day, breakfast and  
16 lunch and dinner, and that were my meals.

17 Q. Were you in solitary confinement?

18 A. No. I was not in a solitary confinement. I  
19 was in the public prison.

20 Q. Did you -- were you imprisoned in a cell while  
21 you were there?

22 A. I was in a room.

23 Q. A prison cell?

24 A. A room, and we were four people living in it.



1 Q. And was the room locked up?

2 A. In the months -- in the first years, it was  
3 not locked, but at the last year, the last  
4 period, the last year, the morning period and  
5 all day period, it was open, except being  
6 locked at night.

7 Q. And do you know why it was locked at night?

8 A. I think it was an administrative procedure  
9 that was followed by the administration of the  
10 prison.

11 Q. And during this period that you were a  
12 prisoner at Abu Salim, were you subject to  
13 interrogations?

14 A. No.

15 Q. Were you subject to any beatings?

16 A. No.

17 Q. What did you do with yourself all day while  
18 you were in this prison?

19 A. Reading the Quran. There was nothing -- and  
20 sitting down. There was nothing else to do.

21 Q. Did you have visitors?

22 A. The family only, sometimes.

23 Q. How frequently did the family visit you while  
24 you were at the prison Abu Salim?

1 A. Almost more than five times.

2 Q. So one time a year?

3 A. Nearly.

4 Q. Who from the family visited you?

5 A. My mother, my wife, my daughter, my son and my  
6 brothers. My brothers, males and females.

7 Q. How many brothers -- how many brothers do you  
8 have?

9 A. One.

10 Q. How many sisters do you have?

11 A. Four.

12 Q. Is your brother a member of the Libyan Islamic  
13 Fighting Group?

14 A. No.

15 Q. Does the Libyan Islamic Fighting Group accept  
16 women as members?

17 A. No.

18 Q. And you were released from this prison in  
19 January of 2011, is that correct, sir?

20 A. After the uprising of the Libyan revolution  
21 and toppling the system of Gaddafi, I got out  
22 of prison.

23 Q. Okay. Now, let me go back. Strike that.

24 When you got out of prison, where

1 did you go?

2 A. I went to my home in the city of Misrata.

3 Q. Misrata, okay.

4 Did you, when you got out of prison,  
5 see a doctor?

6 A. No.

7 Q. When is the first time that you received any  
8 form of medical attention after you were  
9 released from Abu Salim?

10 A. After a period of more or less two years, I  
11 went to receive medical attention to my teeth.

12 Q. So you saw a dentist?

13 A. Yes.

14 Q. How long had it been since you were at a  
15 dentist or visited a dentist?

16 A. I used to frequent the doctor during the  
17 period of ten days.

18 Q. Ten days?

19 A. Yes, because I have tooth cleaning and there  
20 was a filling of one of the tooths (sic).

21 Q. So you saw that dentist two years after you  
22 got out of prison, right?

23 A. Yes.

24 Q. When before that was the last time you had

1 received dental care?

2 A. In the prison.

3 Q. In which prison?

4 A. In the prison of Abu Salim.

5 Q. Okay. Now, let's go back. After you saw the  
6 dentist when you were out of prison, when is  
7 the next time you saw a doctor?

8 A. After two years.

9 Q. That's when he saw the dentist, correct?

10 A. Yes.

11 Q. And then, after that, when is the next time,  
12 if ever, that you saw a doctor?

13 A. I saw a doctor the last time when I went to  
14 the hospital and I took -- I obtained the  
15 x-ray images.

16 Q. Is that the x-ray images for this case?

17 A. Yes.

18 Q. Okay. And is it fair to say that from the  
19 time you were released from prison in January  
20 of 2011, up until today, you never thought  
21 that you needed to see a doctor about anything  
22 pertaining to your body?

23 MS. SHAMSI: Objection.

24 THE WITNESS: Yes.

1 BY MR. SMITH:

2 Q. Sorry. You confused me. So the answer is,  
3 yes, he didn't need to see a doctor?

4 A. Yes.

5 Q. Are there doctors in Misrata?

6 A. Yes.

7 Q. And if you needed to see a doctor in Misrata  
8 from 2011 to 2016, doctors were available to  
9 you?

10 A. It was possible that I visit a doctor, it was  
11 possible, but it's me who was feeling very  
12 apprehensive from visiting doctors and I have  
13 hate towards doctors.

14 Q. I'm sorry. I have?

15 A. Hate towards doctors.

16 Q. Why do you hate doctors?

17 A. I have seen in the prison of Cobalt a bad  
18 model of doctors who have played a bad role in  
19 Cobalt, a role that was increasing the pains  
20 of the prisoner and torturing the prisoner,  
21 that which has resulted in a reaction, in my  
22 reaction, against the doctors and I feel  
23 apprehensive towards, especially after they  
24 have -- they have manipulated my private parts

1           within the context of laughter and making  
2           jokes.

3       Q.     Do you know the names of those doctors?

4       A.     No.

5       Q.     Was there any ailment that you had from the  
6           time you left prison in 2011 up through 2016  
7           in which you thought you needed to see a  
8           doctor?

9       A.     I had pain in my back, in my legs,  
10          inflammation in my sinus, and headache.

11      Q.     When did you have this pain in your back?

12      A.     At intervals.

13      Q.     During what years?

14      A.     In all the years.

15      Q.     How frequently do you have this pain in your  
16          back?

17      A.     On average, the light pain is a continuous  
18          pain, but the stronger fits, on average, like  
19          every three months.

20      Q.     And where in your back does it hurt?

21      A.     The lower back of the -- the lower back.

22      Q.     Have you ever considered going to see a doctor  
23          to find out what, if anything, is wrong with  
24          your back?

1 A. No. Never.

2 Q. When did your -- when did you start to  
3 experience this pain in your back?

4 A. It was continuous.

5 Q. Starting when?

6 A. It -- it was when I were in prison in Cobalt,  
7 the hanging, the continuous shackling with a  
8 position of squatting, shackled to the wall,  
9 and the cold icy water.

10 Q. So you're saying that cold icy water caused  
11 you to have pain in your back?

12 A. I think so.

13 Q. And did this back pain continue when you went  
14 to -- when you left Cobalt?

15 A. Up till -- up till now, it's continuous.

16 Q. And has it always been the same periodically?

17 A. It became a little bit less.

18 Q. When did it become less?

19 A. When I went out and I was able to obtain a  
20 good system of heating to protect myself from  
21 cold, the cold.

22 Q. And, presently, is it fair to say that this  
23 back pain that you experience is on a periodic  
24 basis?

1 A. Yes, it happens to me periodically.

2 Q. Now, you said that you also experience pain in  
3 your legs?

4 A. Yes.

5 Q. Both legs?

6 A. Yes.

7 Q. Where in your legs?

8 A. Pain in the knees and pain in the left leg,  
9 the area of the foot.

10 Q. So pain where you were shot in your foot?

11 A. Yes.

12 Q. And is it pain in both knees?

13 A. Yes. And the left one, more so.

14 Q. And when did you start experiencing this pain  
15 in your knees?

16 A. Since the prison of Cobalt.

17 Q. And has the pain continued since Cobalt?

18 A. Yes.

19 Q. And how frequently do you experience pain in  
20 your knees?

21 A. Pain in my left knee recur when I got exposed  
22 to the cold or performing the prayer, and the  
23 left knee would pain me sometimes.

24 Q. What about your right knee?



1 A. My right knee, as well. When I am exposed to  
2 the cold, it recurs from time to time.

3 Q. How frequently do you experience pain in your  
4 knees?

5 A. My left one, I have a constant pain and it  
6 would increase when I pray, when I do -- when  
7 I perform the movements of the praying or when  
8 I am exposed to the cold.

9 MS. SHAMSI: Jim, before you ask  
10 your next question, when it gets loud again,  
11 would you just speak up a little bit, because  
12 I can't hear you.

13 MR. SMITH: Sure.

14 BY MR. SMITH:

15 Q. Did you experience pain in your left knee  
16 today?

17 A. Yes. At the times of praying, I feel the pain  
18 when praying.

19 Q. Do you participate in any sporting activities?

20 A. No.

21 Q. Do you play any sporting activities with your  
22 children?

23 A. Light sports at home, but I do not join in any  
24 sports.

1 Q. You play sports with your children?

2 A. Very simple.

3 Q. Okay. Now, your sinus inflammation, do you  
4 presently have sinus inflammation?

5 A. Yes.

6 Q. How long have you had sinus inflammation?

7 A. Since I was in Cobalt, because I was detained  
8 for a long time in a rotten smelly room that  
9 does not receive air, as well, when I was  
10 water tortured and the water would seep into  
11 my nostrils.

12 Q. And has the sinus inflammation improved since  
13 you are out of Cobalt?

14 A. Unfortunately, I suffered from the loss of  
15 smelling sensation and it's carried on, it's  
16 continued with me up till now.

17 Q. And have you taken any steps to try to heal or  
18 correct that condition?

19 A. Yes. Inside the prison Abu Salim, I took some  
20 medication, but for no gain, no use.

21 Q. When you got out of prison, did you seek out  
22 any doctors to try to correct this sinus  
23 inflammation?

24 A. Yes. I asked for treatment and I was given

1 the treatment.

2 Q. Where were you given treatment?

3 A. In Abu Salim prison.

4 Q. But when you got out of Abu Salim prison, did  
5 you seek out any further treatment for this  
6 sinus condition or sinus inflammation?

7 A. I did not look for that because, according to  
8 what has been said to me at prison of Abu  
9 Salim, the doctor told me that this  
10 inflammation is a constant one and there is no  
11 way to treat it.

12 Q. Did you believe this doctor in the prison?

13 A. I used the medication more than once and it  
14 did not result in anything.

15 Q. You also mentioned headaches.

16 A. Yes.

17 Q. When did you start experiencing headaches?

18 A. The headaches would come to me from time to  
19 time and I felt the headaches amongst what I  
20 have felt in the Cobalt prison.

21 Q. When did you start experiencing these  
22 headaches?

23 A. I felt the headaches in the Cobalt -- in the  
24 Cobalt prison.

1 Q. And how frequently did you have headaches at  
2 the Cobalt prison?

3 A. It was continuous.

4 Q. Can you explain to me what you mean by that?

5 A. It means through most of the days of the week.

6 Q. When you got out of Cobalt, did you continue  
7 to experience these headaches?

8 A. To a much lesser degree.

9 Q. And, presently, is it fair to say that you no  
10 longer experience the headaches?

11 MS. SHAMSI: Objection.

12 THE WITNESS: Sometimes.

13 BY MR. SMITH:

14 Q. How frequently?

15 A. Sometimes.

16 Q. How frequently do you experience these  
17 headaches now?

18 A. Nearly once or twice a week.

19 Q. And what do you take for the headaches?

20 A. Usually, the Panadol (pronounced Banadol).

21 Q. Benadryl?

22 A. Banadol (sic).

23 Q. Spell that, please.

24 A. B-A-N-D-O-L (sic.)

1 Q. And what is Panadol?

2 A. This is a painkiller for headaches.

3 Q. And is it similar to an aspirin?

4 A. It's like paracetamol.

5 Q. I'm sorry. Like?

6 A. Paracetamol. P-A-R-C -- (translation  
7 discussion.) P-A-R-C-E-T-M-O-L (sic), I  
8 believe. Paracetamol.

9 Q. And what is paracetamol?

10 A. These are brands of medications that are sold  
11 in our pharmacies. This is all I know.

12 Q. Is it sold over-the-counter or do you need a  
13 prescription?

14 A. You can take it.

15 Q. Over-the-counter?

16 A. From the pharmacy.

17 Q. Do you need a prescription from a doctor?

18 A. Yes, you need, sometimes.

19 Q. Did you get a prescription from a doctor to  
20 take this paracetamol?

21 A. A prescription from the doctors that I know,  
22 they would give me the Panadol, and this is  
23 when I talk to my doctors, doctor  
24 acquaintances.

1 Q. So have you seen doctors for any of your  
2 conditions that you described here?

3 MS. SHAMSI: Objection. You may  
4 answer.

5 THE WITNESS: During my stay at Abu  
6 Salim prison, I obtained a consultation about  
7 my sinus and about my teeth. And, later on, I  
8 got a consultation about my teeth only.

9 BY MR. SMITH:

10 Q. Do you know what a psychologist is?

11 A. We don't have such a term.

12 Q. Do you know what a psychiatrist is?

13 A. Yes.

14 Q. What is a psychiatrist?

15 A. That is the specialist who is concerned about  
16 -- concerned about treating whatever a person  
17 goes through concerning psychological  
18 instances, bad psychological instances, and he  
19 would offer treatment that -- to that ailment.

20 Q. After you were released from prison in January  
21 of 2011, did you see any psychiatrists?

22 A. No.

23 Q. Did you have any -- strike that.

24 Have you suffered any psychological

1 injuries as a result of your captivity in  
2 Cobalt?

3 A. Of course.

4 Q. What are they?

5 A. Nightmares, feeling of an anxiety and tension,  
6 feeling of a psychological condition that  
7 would ensue having erratic movements.

8 Q. Anything else?

9 A. Fear and worry.

10 Q. Anything else?

11 A. No.

12 Q. Can you tell me about these nightmares that  
13 you've experienced, sir?

14 A. It comes to me during my sleep and as if I'm  
15 still imprisoned in that horrible place and  
16 still shackled.

17 Q. So your nightmares are about being imprisoned  
18 in Cobalt?

19 A. Yes.

20 Q. Not about your other imprisonments?

21 A. No.

22 Q. And is this -- is the nightmare always the  
23 same?

24 A. In different ways. Sometimes I feel that I am

1           shackled, that guards are entering with great  
2           -- with -- forcibly to the room, and sometimes  
3           I feel that I am being dragged and that I am  
4           being shackled, just like that.

5       Q.    When is the last time you had one of these  
6           nightmares?

7       A.    Last month.

8       Q.    And when before that was the last time you had  
9           one of those nightmares?

10      A.    All the time.  It occurs to me from time to  
11           time.

12      Q.    When before last month is the last time you  
13           experienced one of those nightmares?

14      A.    I get those disturbing dreams nearly on a  
15           monthly basis.

16      Q.    So are you saying that approximately one time  
17           a month, you have one of these nightmares?

18      A.    Nearly, yes.

19      Q.    Okay.  And is there something that you think  
20           triggers the nightmare?

21      A.    I believe that the scene or the scenes that I  
22           have lived in the prison of Cobalt or coming  
23           across anything that would trigger such  
24           images, this is what causes my bad dreams.



1 Q. What do you think triggers your nightmares?

2 MS. SHAMSI: Objection.

3 THE WITNESS: Watching bad news,  
4 mingling with persons who were at the prison  
5 with me, talking about the topic. In general,  
6 talking about that topic would bring memories  
7 of what has happened in that prison.

8 BY MR. SMITH:

9 Q. And are you saying that when you talk about  
10 it, that that causes nightmares?

11 A. Yes.

12 Q. Did you have a nightmare last night?

13 A. Last week, yes.

14 Q. So the last time you had a nightmare was last  
15 week?

16 A. Yes.

17 Q. And has the frequency of these nightmares  
18 remained the same or decreased since you were  
19 released from Cobalt?

20 A. It became less.

21 Q. Now, you also said that you have feelings of  
22 anxiety.

23 A. Yes.

24 Q. Describe for me these feelings of anxiety.

1 A. I feel that during my daily life, I get the  
2 feeling of worry about my future and about the  
3 fear that this could happen again, be repeated  
4 to me, or that I would experience something  
5 similar to that what -- to which has happened  
6 to me before.

7 Q. Did you report these feelings of anxiety to  
8 anyone?

9 A. Yes. I talked about these things to my wife,  
10 who is the closest person to me.

11 Q. Did you speak to anyone else about these  
12 anxiety feelings?

13 A. Yes. I talked about them to the doctors that  
14 I met, Dr. Brook and Dr. Allen.

15 Q. Anyone else?

16 A. No.

17 Q. Did you ever attempt to understand what the  
18 cause of these anxiety feelings is?

19 A. In our country, we are going through a very  
20 unsettled political situation, the fear that  
21 there could be a way to a repetition of this  
22 experience, that experience that I passed  
23 through.

24 Q. Mr. Soud, you spent the better part of your

1 adult life devoted to your participation in  
2 the Libyan Islamic Fighting Group, isn't that  
3 right?

4 A. Yes.

5 Q. You train people how to kill people, right?

6 A. I was training people how to get rid of  
7 Al-Gaddafi regime.

8 Q. Okay.

9 A. I do not teach people how to kill people. I  
10 teach them how to kill that tyrant who was  
11 killing people.

12 Q. But I thought that you had said yesterday that  
13 you were training people how to kill not only  
14 Gaddafi, but people that were in his regime.

15 MS. SHAMSI: Objection. You may  
16 answer.

17 THE WITNESS: There are people who  
18 are surrounding Gaddafi who are like a tool  
19 for him to kill and torture people, and we  
20 consider these people, like Gaddafi, deserve  
21 to be killed.

22 BY MR. SMITH:

23 Q. Now, here's -- here's my question: Do you  
24 think that your decision to spend the better

1 part of your adult life committed to the  
2 Libyan Islamic Fighting Group is in any way  
3 responsible for these psychological conditions  
4 that you're talking about?

5 MS. SHAMSI: Objection. You may  
6 answer.

7 THE WITNESS: No.

8 BY MR. SMITH:

9 Q. So you don't think being known to be part of a  
10 revolutionary movement who was prepared to use  
11 force caused any of the anxiety that you  
12 experience?

13 A. No.

14 Q. And you were -- I think you told me that you  
15 were in shootouts where you were shooting an  
16 AK-47 at Russians. Do you remember you told  
17 me about that yesterday?

18 A. Yes.

19 Q. Did that cause you any anxiety?

20 A. No.

21 Q. Did that cause you any fear?

22 A. I do not say that these things are simple  
23 things, but the fear and the insomnia that I  
24 felt, I felt it then, that was after the

1 period of Cobalt and the images that come to  
2 me are because of that. It never happened to  
3 me all through my life that my dignity was  
4 afflicted except when I were at that prison  
5 Cobalt.

6 Q. Were at the prison?

7 A. At that prison Cobalt.

8 Q. Oh, prison Cobalt. Okay.

9 Do you know what a flashback is?

10 A. No.

11 Q. The problems with your back, the lower back,  
12 were they in any way related to the -- the  
13 incident where you were shot by the Pakistani  
14 police in your foot?

15 A. I don't think so.

16 Q. Why?

17 A. I don't think that there is a relation between  
18 my foot and my back.

19 Q. Do you -- is your foot fully healed, the foot  
20 that got shot?

21 A. No.

22 Q. And how do you know your foot isn't fully  
23 healed?

24 A. When I walk for a long distance, I feel the

1 pain in my foot, and I still, if I press on my  
2 heel, I still feel the pain.

3 Q. What foot were you shot in?

4 A. The left one.

5 Q. And is that the one where you still feel the  
6 pain?

7 A. Yes.

8 Q. And does it force you to walk with an unsteady  
9 gait?

10 A. Yes. When I lean on it and walk for a longer  
11 period of time, yes, I have to -- to walk  
12 leaning sideways.

13 Q. Do you think that may have some effect on your  
14 back?

15 A. I don't know.

16 Q. Did you ever think to ask a doctor?

17 A. No.

18 Q. Do you think that the injury to your foot may  
19 have some impact on your knees?

20 A. I don't know.

21 Q. Did you ever think to ask a doctor?

22 A. No.

23 Q. Can you describe for me the last time you had  
24 a nightmare and what the nightmare was?

1 A. Last week, last month, last week.

2 Q. Was it last week or was it last month?

3 A. Last week.

4 Q. Okay. Tell me what the nightmare was.

5 A. I saw that I was in a place where the door was  
6 pushed forcibly and I thought that this place  
7 was the same place that I were in and my hands  
8 were shackled and it was the same place that I  
9 lived in.

10 INTERPRETER: May the interpreter --

11 MR. SMITH: Sure.

12 INTERPRETER: -- for repetition?

13 (Translation.)

14 INTERPRETER: The last segment,  
15 wearing the same clothes.

16 BY MR. SMITH:

17 Q. So, Mr. Soud, just to make sure I understand,  
18 did you wake up in the middle of the night  
19 from this nightmare?

20 A. The nightmares that came to me in the recent  
21 periods, I did not wake up. I did not wake  
22 up.

23 Q. Okay. But what you recall -- so this was a  
24 dream that you had, right?

1 A. Yes.

2 Q. Okay. And you dreamed that you were back at  
3 the facility at Cobalt, right?

4 A. Yes.

5 Q. And you were shackled?

6 A. Yes.

7 Q. In the cell?

8 A. Yes.

9 Q. Did anything happen to you in the dream?

10 A. No. It's just that the guard has pushed the  
11 door forcibly. No, nothing happened to me.

12 Q. And in that dream, could you see an image of  
13 the guard?

14 A. No. I saw him like the image that used to be,  
15 hooded, or masked, masked.

16 MS. SHAMSI: Is that --

17 INTERPRETER: Masked.

18 MS. SHAMSI: That's what he said?

19 INTERPRETER: Yes.

20 BY MR. SMITH:

21 Q. Mr. Soud, do you know if there was a tribe  
22 that was responsible for guarding the facility  
23 at Cobalt?

24 A. I don't know that. I didn't hear.



1 Q. All right.

2 (Construction noise.)

3 MS. SHAMSI: Jim, if you've moved on  
4 to a separate topic -- (inaudible.)

5 MR. SMITH: Yeah, let me just finish  
6 this.

7 COURT REPORTER: I couldn't hear.

8 MS. SHAMSI: Sorry. There's  
9 construction noise. If you've moved on to a  
10 separate topic, could we take a five minute  
11 break now?

12 MR. SMITH: Sure.

13 BY MR. SMITH:

14 Q. Mr. Soud, do you remember anything else about  
15 the dream other than what you've told me?

16 A. No.

17 Q. And the dream that you described to me, is  
18 that consistent with the other dreams that  
19 you've had or are they different?

20 A. Different.

21 Q. I think you said prior to that dream either  
22 last week or last month, you had a dream  
23 sometime a month or so before that.

24 A. I saw a nightmare in a different way, as if I

1           were still in prison, still in my room, still  
2           being dragged to the interrogation room, the  
3           door is forcibly pushed open while I am in the  
4           room.

5       Q.    And these people that are dragging you, how do  
6           you know that they weren't from the Libya  
7           prison as opposed to from Cobalt?

8       A.    The image that came to me was that of those  
9           people who wear masks and wearing black  
10          clothes.

11      Q.    And in the Libyan prison, did they not wear  
12          masks and black clothes, the interrogators?

13      A.    No.

14                       MR. SMITH:   Okay.   Let's take a  
15          break.

16                       VIDEOGRAPHER:   The time is 3:51.  
17          We're off the record.

18                       (Brief pause.)

19                       VIDEOGRAPHER:   Back on the record.  
20          The time is 4:01.

21      BY MR. SMITH:

22      Q.    Mr. Soud, are you able to go forward?

23      A.    Yes.

24      Q.    Mr. Soud, when did you become involved in this

1 lawsuit?

2 MS. SHAMSI: Objection. You may  
3 answer.

4 THE WITNESS: I did not understand  
5 the question.

6 BY MR. SMITH:

7 Q. Sure. Are you aware, sir, that on  
8 October 13th, 2015, the American Civil  
9 Liberties Union Foundation filed a lawsuit on  
10 your behalf in the United States District  
11 Court for the Eastern District of Washington?

12 A. Yes.

13 Q. When did you start communicating with  
14 representatives from the ACLU about this  
15 matter?

16 A. I communicated with the group of lawyers in  
17 May 2015.

18 Q. And how is it that you had occasion to  
19 communicate with a group of lawyers in May  
20 2015?

21 A. The idea came to me while I was -- or I had  
22 the idea when I was following with the case  
23 that I have gone through and that was when I  
24 met one of the members of the Human Rights

1 Watch concerning the prisoners who have been  
2 in the American prisons and were handed over  
3 to the Gaddafi regime.

4 Q. Who did you meet from the Human Rights Watch?

5 A. A lady called Laura Peter (sic).

6 Q. And how did you meet her?

7 A. She came to Libya and interviewed --  
8 interviewed me.

9 Q. And had you spoken with her before the  
10 interview?

11 A. She communicated with Mr. Khalid al-Sharif and  
12 Khalid al-Sharif contacted me and told me  
13 about that.

14 Q. And did she also interview Sharif?

15 A. Yes.

16 Q. And what organization do you think she was  
17 from?

18 MS. SHAMSI: I was going to just say  
19 objection, but it was very quick, but  
20 objection to that question. You may answer.

21 THE WITNESS: Human Rights Watch.

22 BY MR. SMITH:

23 Q. And what did you understand that organization  
24 to be?

1 A. It is an organization that is looking after  
2 the rights and the rights -- the human rights.

3 Q. And you had a meeting with Miss Peters?

4 A. Yes.

5 Q. And when was the meeting?

6 A. About 2012.

7 Q. Okay. And who else was present for this  
8 meeting other than you and Miss Peters?

9 A. I think that the meeting was with Abdelhakim  
10 Belhadj, Sami Majed, Saleh Al-Driki and Ayoub.

11 Q. So these were all members of the Libyan  
12 Islamic Fighting Group?

13 A. Yes.

14 Q. And who gathered them all up to meet with  
15 Miss Peters?

16 A. I don't know.

17 Q. And you were part of the meeting, obviously?

18 A. Yes.

19 Q. And how long did you meet with her?

20 A. For a period of two hours, two, three hours.

21 Q. Did she tape record the meeting?

22 A. She wrote the meeting, yes.

23 Q. Was it tape recorded?

24 A. I do not remember, no.

1 Q. Okay. And when, after you met with her in  
2 2012, did you next speak with her?

3 A. I do not remember when, but Khalid al-Sharif  
4 told me, and after the expected report came  
5 out, she sent the -- that report that has been  
6 issued, that has been published or issued.

7 Q. And is this --

8 MR. ALHALABI: If I may.

9 INTERPRETER: Published?

10 MR. ALHALABI: If I may. I don't  
11 know when, she informed me via email through  
12 Khalid al-Sharif about the awaited version of  
13 the report and we received a copy.

14 BY MR. SMITH:

15 Q. And is this the report that's been marked as  
16 Exhibit 1 at your deposition, sir?

17 A. No. No.

18 Q. It was a different report?

19 A. Yes.

20 Q. Okay. Can you describe the report?

21 A. It was a report that was prepared by the Human  
22 Rights Watch concerning the prisoners whom the  
23 CIA have captured and those were Libyan  
24 detainees who have been handed over to the

1 Gaddafi regime.

2 Q. Okay. Do you remember the date of this  
3 report?

4 A. Not exactly.

5 Q. Okay. What happened, if anything, as a result  
6 of your receipt of this report?

7 MS. SHAMSI: Objection. You may  
8 answer.

9 THE WITNESS: I did not understand  
10 the question.

11 BY MR. SMITH:

12 Q. You had a meeting with Miss Peters, right?

13 A. Yes.

14 Q. And it was attended by Sharif and three or  
15 four others, right?

16 A. Separate interviews, each one on his own.

17 Q. Got it. And that was in 2012?

18 A. Yes.

19 Q. Sometime thereafter, you got a copy of a  
20 report from Miss Peters, correct?

21 A. Yes.

22 Q. Okay. And you don't remember when?

23 A. No, I do not recall the date, in particular.

24 Q. But you remember that this report was prepared

1 by the Human Rights Watch group?

2 A. Yes.

3 Q. The report that was given to you, was it in  
4 Arabic?

5 A. No.

6 Q. Did you ever see the report in Arabic?

7 A. No. No.

8 Q. After you got the report, did you ever speak  
9 to Ms. Peters again?

10 A. I talked with Mr. Khalid al-Sharif because I  
11 did not have a direct contact with Miss Laura  
12 Peter (sic), but my communication was with  
13 Mr. Khalid al-Sharif.

14 Q. Okay. Did you ever speak to Miss Peters  
15 again?

16 A. Yes.

17 Q. When?

18 A. In Libya.

19 Q. When after you got the report did you speak to  
20 her?

21 A. I do not remember the date exactly.

22 Q. Okay. Can you -- I'm sorry.

23 A. I talked with her, I do not remember the date  
24 exactly.



1 Q. Can you approximate when you next talked to  
2 her?

3 A. It's difficult to remember. I don't remember.

4 Q. What did you talk about when you next talked  
5 to her?

6 A. I talked with her during that meeting in 2012  
7 and she showed sympathy towards our case and  
8 introduced us -- introduced us to the lawyers  
9 of that civil -- civil right organization.

10 Q. Was that in the second communication that she  
11 introduced you to the lawyers?

12 A. In the second communication, she -- and then  
13 she had introduced both of us to each other,  
14 myself and the civil -- the organization of  
15 civil rights, the American civil rights.

16 Q. And was that a meeting that took place in  
17 person?

18 A. Which meeting?

19 Q. The second meeting where he was introduced to  
20 lawyers from the ACLU.

21 MS. SHAMSI: Objection. You may  
22 answer.

23 THE WITNESS: Mrs. Laura Peter (sic)  
24 just connected us with the lawyers through a

1 communication and just introduced us, and then  
2 we came to know the lawyers from the civil  
3 right organization.

4 BY MR. SMITH:

5 Q. What was the mode of communication that Peters  
6 introduced you to the lawyers for the civil  
7 rights organization?

8 A. Through Khalid al-Sharif, through phone or a  
9 communication with, it's not clear, and she  
10 said that I have told about your case to the  
11 human -- to the civil rights organization and  
12 this is what she said.

13 Q. Okay. When is the first time that you talked  
14 to a lawyer from the American Civil Liberties  
15 Union?

16 A. In May 2015.

17 Q. Who did you talk to?

18 A. I talked with the group of lawyers.

19 Q. What are the names of the lawyers that you  
20 talked to?

21 A. With Mr. Steven.

22 MR. ALHALABI: Steven Watt.

23 Q. Steven Watt. Anyone else?

24 A. No, only.

1 Q. Okay. When did you authorize the American  
2 Civil Liberties Union to act on your behalf?

3 A. At that time, where I met with the lawyers in  
4 2015.

5 Q. So you met with --

6 A. May of 2015.

7 Q. So you had a face-to-face meeting in May of  
8 2015?

9 A. Yes.

10 Q. With Mr. Watt?

11 A. Yes.

12 Q. Anyone else?

13 A. No.

14 Q. And at that point had you ever talked to  
15 Mr. Watt before?

16 MS. SHAMSI: Let me just interject  
17 here because you can answer these questions  
18 without divulging information, any information  
19 that was discussed between you and a ACLU  
20 lawyer, for reasons of privilege.

21 BY MR. SMITH:

22 Q. Do you remember the question?

23 A. No.

24 MR. SMITH: Could you repeat the

1 question, madam court reporter.

2 (Whereupon, the record was read back  
3 as follows: "And at that point had  
4 you ever talked to Mr. Watt  
5 before?")

6 A. No.

7 Q. Had you ever talked to any lawyer from the  
8 ACLU before that meeting in May of 2015?

9 A. No.

10 Q. At that meeting, did you authorize the  
11 American Civil Liberties Union to act on your  
12 behalf?

13 A. Yes.

14 Q. Where did the meeting take place?

15 A. In Turkey.

16 Q. Where in Turkey?

17 A. In Istanbul.

18 Q. Who was present in addition to you and  
19 Mr. Watt at that meeting?

20 A. The interpreter only.

21 Q. Okay. Was Sharif present?

22 A. Yes.

23 Q. Who else was present?

24 A. No one.

1 Q. So it was Sharif, you, Mr. Watt and an  
2 interpreter?

3 A. Yes.

4 Q. Was Sharif interested in joining the lawsuit?

5 MS. SHAMSI: Objection. Hearsay.

6 You may...

7 THE WITNESS: I think so.

8 BY MR. SMITH:

9 Q. Okay. Did Sharif tell you that he was  
10 interested in joining the lawsuit?

11 A. He didn't tell me directly, but I could see  
12 that from his being there that he is  
13 interested in the case.

14 Q. And do you know why he didn't join the  
15 lawsuit?

16 MS. SHAMSI: I'm going to object and  
17 I need to take a little bit of a break just to  
18 make sure. I need to have a couple of things  
19 cleared here.

20 MR. SMITH: Let me ask you --

21 (Translation.)

22 MR. SMITH: Yeah. Okay. Let me  
23 just ask on the record, counsel, was Sharif  
24 your client?

1 MS. SHAMSI: There was a period of  
2 discussion and we met with him, and beyond  
3 that, I'm not going to say anything without  
4 clarifying things with Steven.

5 MR. SMITH: Oh, you need to talk to  
6 Steven?

7 MS. SHAMSI: Yeah.

8 MR. SMITH: Oh, okay. Fair enough.

9 INTERPRETER: The time is 4:28.  
10 We're off the record.

11 (Brief pause.)

12 THE COURT: Back on the record. The  
13 time is 4:39.

14 MR. SMITH: Madam court reporter,  
15 could you repeat the question that was pending  
16 for the witness.

17 (Whereupon, the record was read back  
18 as follows: "And do you know why he  
19 didn't join the lawsuit?")

20 THE WITNESS: I don't know.

21 BY MR. SMITH:

22 Q. But he wanted to?

23 A. Possibly that he wanted, but how could I know  
24 if he would have wanted to or not, or he

1 wanted to participate, I don't know.

2 Q. Do you know who was paying for your attorneys?

3 A. The question, I do not understand.

4 Q. Do you know who is paying for your lawyers?

5 MS. SHAMSI: Objection. You may  
6 answer.

7 THE WITNESS: These are things I  
8 don't know. I don't know.

9 BY MR. SMITH:

10 Q. Do you know if the LIFG is paying for any part  
11 of this lawsuit?

12 MS. SHAMSI: Objection. You may  
13 answer.

14 THE WITNESS: I don't know.

15 (Whereupon, Soud Exhibit No. 3 was  
16 marked for identification.)

17 BY MR. SMITH:

18 Q. Let me show you what's been marked as Exhibit  
19 No. 3.

20 MR. ALHALABI: I believe he said  
21 "no, no." Not "I don't know."

22 INTERPRETER: He said "no, no"?

23 MR. ALHALABI: He said "no, no."  
24 Not "I don't know."

1 BY MR. SMITH:

2 Q. Let me -- before we do that, Mr. Soud, let me  
3 ask you, have you discussed this lawsuit with  
4 any of the members of the LIFG?

5 A. No.

6 Q. I've placed before you what's been marked as  
7 Exhibit No. 3. For the record, this is a copy  
8 of the complaint that was filed on your behalf  
9 by your attorneys.

10 Were you shown a copy of this  
11 complaint in Arabic before it was filed?

12 A. Yes.

13 Q. Who showed it to you?

14 A. The group of lawyers.

15 Q. Okay. And is that the group of lawyers who  
16 are here today?

17 A. It was shown to me by one of those who are  
18 present.

19 Q. Okay. Which one?

20 A. Mr. Watt.

21 Q. And how did Mr. Watt present to you a copy of  
22 this complaint in Arabic?

23 MS. SHAMSI: Objection. You may  
24 answer.



1 THE WITNESS: He gave me this or  
2 presented me with this copy through the email.

3 BY MR. SMITH:

4 Q. Okay. Now, can you tell me, sir, what efforts  
5 you made to get into the United States for  
6 your deposition to be taken in the US?

7 A. I applied at the American embassy in Istanbul  
8 to get a visa.

9 Q. When did you apply?

10 A. In two thousand and -- in this year, in 2016.

11 Q. When in 2016?

12 A. Maybe in the month eight, the eighth month,  
13 nearly.

14 Q. So August of 2016?

15 A. Nearly.

16 Q. Okay. And was anyone with you when you  
17 applied for this visa?

18 A. The interpreter.

19 Q. Anyone else?

20 A. No.

21 Q. And this was an US embassy where?

22 A. In Istanbul.

23 Q. Istanbul. And did the US government or the US  
24 embassy give you a visa when you applied?

1 A. No.

2 Q. Do you know why?

3 A. They thought that -- they said -- they didn't  
4 say the reasons, about the reasons why they  
5 didn't give me a visa, but they said that you  
6 can apply for a visa under different  
7 conditions and you can apply for that.

8 Q. What did you understand they meant by "under  
9 different conditions"?

10 MS. SHAMSI: Objection. You can  
11 respond to that to the extent that you do not  
12 discuss information that you discussed with  
13 your counsel.

14 THE WITNESS: The person to whom I  
15 presented the application said "I am sorry for  
16 not giving you the visa, but it's possible  
17 that you can apply another time."

18 BY MR. SMITH:

19 Q. And did you apply another time?

20 A. No.

21 Q. So after August, you never made application  
22 again for a visa to the US?

23 A. No, I did not go another time, didn't go.

24 Q. Is there a reason why you didn't go?

1 A. All I knew, all I knew, that there wasn't --  
2 still, the first reason is still present. As  
3 well, I did not obtain the Turkish visa, to go  
4 there -- to go once more.

5 Q. Do you know why?

6 A. Why what --

7 (Translation discussion.)

8 INTERPRETER: The interpreter didn't  
9 hear.

10 (Translation discussion.)

11 THE WITNESS: I could not obtain the  
12 Turkish visa, so I -- to be able to go there  
13 and obtain the American visa.

14 BY MR. SMITH:

15 Q. Mr. Soud, is it your understanding, presently,  
16 that the United States government will not  
17 allow you into the United States of America?

18 MS. SHAMSI: Objection. You may  
19 answer.

20 THE WITNESS: Yes.

21 BY MR. SMITH:

22 Q. Okay. And your testimony is you have no  
23 understanding why the United States will not  
24 let you into the United States of America?

1 MS. SHAMSI: Objection. You may  
2 answer.

3 THE WITNESS: Yes. The employee  
4 apologized and that -- and that's -- that's  
5 it.

6 BY MR. SMITH:

7 Q. And you have no understanding why the United  
8 States government will not allow you into the  
9 United States of America, is that your  
10 testimony?

11 MS. SHAMSI: Objection. You may  
12 answer.

13 THE WITNESS: I did not understand.  
14 I did not understand the reason. I did not  
15 understand the reason.

16 BY MR. SMITH:

17 Q. Okay. And I take it you have no -- presently,  
18 you don't believe that you would be allowed to  
19 even come in and testify in connection with  
20 the trial of this matter, is that right?

21 MS. SHAMSI: Objection.

22 (Translation.)

23 MS. SHAMSI: Sorry. Objection.

24 THE WITNESS: Repeat the

1 interpretation.

2 (Translation.)

3 THE WITNESS: Yes.

4 BY MR. SMITH:

5 Q. Do you intend to come to testify in this  
6 trial?

7 A. Where?

8 Q. Are you aware that there's a trial date that's  
9 been set in this case?

10 A. Yes.

11 Q. When is the trial date?

12 A. I don't know exactly. I cannot remember  
13 precisely.

14 Q. And do you intend to come and testify at the  
15 trial?

16 A. I intend to give my testimony, yes.

17 Q. Okay. Have you begun to make any efforts to  
18 get permission to come to the United States of  
19 America as of this day?

20 A. Previously, when I tried to obtain the visa  
21 from the American embassy in Istanbul, that  
22 was the only attempt.

23 Q. But have you started any efforts to get a visa  
24 to come into the United States to testify at

1 trial?

2 A. Up till now, no.

3 Q. Okay. Who is Dr. Allen Keller?

4 A. A doctor whom I met in Istanbul.

5 Q. When did you meet him?

6 A. In the -- in the month eight of the previous  
7 year.

8 Q. So you think you met him in August of 2016?

9 A. I think, yes.

10 Q. Okay. And when you met him, was anyone else  
11 present?

12 A. There was the interpreter and Mr. Steven.

13 Q. That's Steven Watt?

14 A. Yes.

15 Q. Okay. And what did you understand the purpose  
16 of meeting with Allen Keller to be?

17 A. What I understood was to get a report about my  
18 health condition.

19 Q. Okay. Had you ever met with Dr. Allen Keller  
20 before August of 2016?

21 A. No.

22 Q. How much time did you spend with him when you  
23 met in August of 2016?

24 A. Nearly three days.

1 Q. Three days. Do you have any memory of what  
2 you talked to him about?

3 A. I talked about my medical condition.

4 Q. What else?

5 A. And I made medical exams.

6 Q. What else, if anything?

7 A. That is only it.

8 Q. Do you remember what sort of medical exam he  
9 did on you?

10 A. I had medical tests for my ears and the  
11 sinuses, the sinus, and the broken bone in my  
12 leg.

13 Q. You said "leg." Do you mean your foot?

14 A. Yes.

15 Q. That's the foot that you were shot by the  
16 Pakistani police?

17 A. Yes.

18 Q. Okay. Any other medical exams other than what  
19 you've told me?

20 A. This is only what I remember.

21 Q. Okay. And do you remember what you told  
22 Dr. Keller about your medical condition?

23 A. Yes.

24 Q. How much time did you spend talking about your

1 medical condition?

2 A. It was hours distributed between two days.

3 Q. Okay. And did you discuss with him anything  
4 else other than your medical condition and the  
5 medical exams?

6 A. No.

7 Q. So, for example, you did not discuss with him  
8 the circumstances of your arrest by the  
9 Pakistani police?

10 A. No.

11 Q. Okay. Are you aware that Dr. Keller prepared  
12 a report relating to you?

13 A. Yes.

14 Q. Have you seen the report?

15 A. I saw the report, but I did not see the Arabic  
16 copy.

17 Q. Okay. So I take it, then, you have never  
18 approved the report that Dr. Keller prepared  
19 on your behalf?

20 A. I talked with him about all I have and he  
21 wrote that down.

22 Q. I'm going to move to strike your answer as  
23 nonresponsive.

24 MR. SMITH: Could you repeat the



1 question to the witness, please.

2 (Whereupon, the record was read back  
3 as follows: "So I take it, then,  
4 you have never approved the report  
5 that Dr. Keller prepared on your  
6 behalf?")

7 MS. SHAMSI: Objection. You may  
8 answer.

9 THE WITNESS: I approved of the  
10 report because I consider whatever is  
11 mentioned there is the truth.

12 BY MR. SMITH:

13 Q. So you assume that whatever Dr. Keller wrote  
14 was the truth even though you never reviewed  
15 what he actually wrote in his report, is that  
16 right?

17 MS. SHAMSI: Objection. You may  
18 answer.

19 THE WITNESS: Yes.

20 BY MR. SMITH:

21 Q. Mr. Soud, let me ask you again, on the day  
22 that the Pakistani police showed up at your  
23 house, were you attempting to flee from the  
24 police when you were shot?

1 A. Yes.

2 Q. Are you aware that you testified yesterday  
3 that you were not attempting to flee from the  
4 police?

5 MS. SHAMSI: Objection. You may  
6 answer.

7 THE WITNESS: My testimony yesterday  
8 was that I tried to escape and I jumped and I  
9 was shot and I fell down.

10 MR. SMITH: So the record will speak  
11 for itself.

12 BY MR. SMITH:

13 Q. Dr. Brock Chisholm, who is he?

14 A. He is a psychiatrist whom I met and I talked  
15 with about my psychological condition.

16 Q. Prior to Dr. Chisholm, had you ever talked to  
17 a psychiatrist before?

18 A. No.

19 Q. When did you talk to Dr. Chisholm?

20 A. Nearly in March of 2016.

21 Q. And who was present when you spoke to  
22 Dr. Chisholm?

23 A. No one was there.

24 Q. Just the two of you?

1 A. The interpreter.

2 Q. So it was the three of you?

3 A. Yes. When I talked to him, we were three,  
4 yes.

5 Q. Okay. How much time did you spend with  
6 Dr. Chisholm?

7 A. About five hours or more.

8 Q. On one day or more than one day?

9 A. In one day.

10 Q. And where did you meet him?

11 A. In Turkey, in Istanbul.

12 Q. Okay. And do you have a memory of what you  
13 and he talked about?

14 A. Yes.

15 Q. Were you aware that a report was prepared by  
16 Dr. Chisholm on your behalf?

17 A. Yes.

18 Q. Have you ever reviewed the report?

19 A. No.

20 Q. After that one time that you met with  
21 Dr. Chisholm, did you ever talk to him again?

22 A. I talked with him in August another time.

23 Q. Okay. Who was present in August when you  
24 talked to him?

1 A. It was myself and him and the interpreter.

2 Q. Okay. And what did you talk about when you  
3 met in August of 2016?

4 A. Same subject.

5 Q. Same subject. How much time did you spend  
6 with him?

7 A. Nearly one hour.

8 Q. One hour. Okay.

9 And was this a meeting that took  
10 place in Istanbul?

11 A. Yes.

12 Q. Okay. And have you talked to him again after  
13 that?

14 A. No, I did not talk with him again.

15 Q. Did Dr. Chisholm ever discuss with you the  
16 opinions that he had formed about you?

17 A. I knew about it through talking with him.

18 Q. So he did share with you his opinions that he  
19 had formed about your mental state?

20 A. He did not share with me, but he told me about  
21 what he has arrived at concerning what I feel,  
22 concerning what I feel like being anxious,  
23 like the nightmares and my fears.

24 Q. When did he share these thoughts with you?

1 A. At the meeting on the month -- the eighth  
2 month.

3 Q. In August?

4 A. Yes.

5 Q. What did he tell you?

6 A. He said that he has written about my  
7 condition, about my anxiety, about my  
8 disturbed psyche, about my psychological  
9 condition, about the nightmares, the fear, the  
10 distrust of doctors, being afraid and the  
11 worries.

12 Q. Did he recommend any treatment?

13 A. No.

14 Q. And since he told you about that, you've taken  
15 no steps to pursue treatment?

16 A. No.

17 Q. Did Dr. Keller ever share with you the  
18 opinions that he formed as a result of his  
19 exam and discussions with you?

20 A. No.

21 Q. Did Dr. Keller ever recommend that you pursue  
22 any treatment?

23 A. No.

24 Q. Mr. Soud, up until today, have you ever seen

1 -- strike that.

2 During the period of time that you  
3 were detained at Cobalt, did you ever see  
4 Dr. Mitchell?

5 A. No.

6 Q. Did you ever talk to anyone that you believed  
7 to be Dr. Mitchell?

8 A. Yes, I talked with the lawyers that I have  
9 seen Dr. Mitchell in prison.

10 MS. SHAMSI: I'm going to caution  
11 you in terms of revealing any subject matter  
12 of our -- revealing the content of our  
13 conversations on the basis of privilege.

14 Please answer.

15 BY MR. SMITH:

16 Q. Mr. Soud, I don't want to know what you talked  
17 to your lawyers about. Okay. Here's what I  
18 do want to know: At any time that you were at  
19 Cobalt, did you ever see Dr. Mitchell at  
20 Cobalt?

21 A. No.

22 Q. Did you ever talk to Dr. Mitchell at Cobalt?

23 A. No.

24 Q. How about at the other facility, did you ever

1 see or talk to him?

2 A. No.

3 Q. Now, Dr. Jessen, when you were at Cobalt,  
4 detained at Cobalt, did you ever see or talk  
5 to Dr. Jessen?

6 A. No.

7 Q. When you were at the other facility, did you  
8 ever see or talk to Dr. Jessen?

9 A. No.

10 Q. Now, as I appreciate it, you believe that the  
11 people that did those things to you at Cobalt  
12 and at the other place were doing it based  
13 upon a program that was established by  
14 Mitchell and Jessen, correct?

15 A. Yes.

16 Q. And that's based upon your personal opinion?

17 A. Yes.

18 Q. And you think that everything that happened to  
19 you at Cobalt and the other facility, when you  
20 were detained, was part of that program?

21 A. What I believe in is that what I have  
22 experienced from torture methods was -- in  
23 Cobalt, was from a program designed by these  
24 doctors.

1 Q. And is it your belief that Drs. Jessen and  
2 Mitchell ordered those people who were at  
3 Cobalt to do those things to you?

4 A. Yes.

5 Q. And you believe that the basis of giving that  
6 order was your review of the Senate Select  
7 report that's marked as Exhibit 1?

8 MS. SHAMSI: Objection. You may  
9 answer.

10 THE WITNESS: What I believe in was  
11 through my personal experience at the prison  
12 of Cobalt and what was assured by this report.

13 BY MR. SMITH:

14 Q. Is there any basis, factual basis, that you  
15 have that Drs. Jessen and Mitchell ordered the  
16 things that happened to you at Cobalt other  
17 than what's been marked as Exhibit 1, which is  
18 the Senate Select Committee on Intelligence  
19 report, any other basis?

20 MS. SHAMSI: Objection. You may  
21 answer.

22 THE WITNESS: I don't know.

23 BY MR. SMITH:

24 Q. Okay. Did any person, any human being, ever



1 tell you that Drs. Jessen and Mitchell ordered  
2 the things that happened to you while you were  
3 at Cobalt, anybody ever tell you that?

4 MS. SHAMSI: Objection. You may  
5 answer.

6 THE WITNESS: I don't know.

7 BY MR. SMITH:

8 Q. Are you aware that Drs. Jessen and Mitchell  
9 have offered sworn testimony in this lawsuit?

10 A. I heard that.

11 Q. Okay. Are you aware that they testified that  
12 they played no role in anything that happened  
13 to you at Cobalt?

14 A. I don't know.

15 Q. Well, what, if anything, were you told about  
16 their testimony as it pertains to you?

17 MS. SHAMSI: Objection. It calls  
18 for privileged information and I'm going to  
19 instruct him not to answer that.

20 MR. SMITH: Okay.

21 (Translation.)

22 BY MR. SMITH:

23 Q. Is the sole basis for your understanding of  
24 the testimony that was offered by

1 Drs. Mitchell and Jessen what your lawyers  
2 told you?

3 A. I did not understand the question.

4 Q. Okay. Do you have an understanding of what  
5 Drs. Jessen and Mitchell testified at their  
6 depositions?

7 A. I heard about this.

8 Q. And did you hear about it from your lawyers?

9 A. Yes.

10 Q. Did you hear about it from any source other  
11 than your lawyers?

12 A. No.

13 MR. SMITH: Okay. We have no  
14 further questions of the witness.

15 MS. SHAMSI: Thanks. I want to take  
16 just a few minutes to go through my notes to  
17 see whether I have any questions to pose.

18 MR. SMITH: You'll let us know when  
19 you're ready.

20 THE COURT: The time is 5:27. We're  
21 off the record.

22 (Brief pause.)

23 VIDEOGRAPHER: Back on the record.

24 The time is 5:38.

EXAMINATION

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BY MS. SHAMSI:

Q. Mr. Ben Soud, Mr. Smith was asking you questions about your visa applications. Did you make those applications directly or did your lawyers make them on your behalf?

A. The lawyers did that on my behalf.

MS. SHAMSI: That's it. I have no further questions.

MR. SMITH: Mr. Soud, thank you. I have no further questions.

VIDEOGRAPHER: This is the end of the deposition for today, Volume 2, and the time is 5:39. We're off the record.

(End of deposition: 5:39 p.m.)

1 COMMONWEALTH OF MASSACHUSETTS )

2 SUFFOLK, SS: )

3

4 I, JANE M. BORROWMAN, Registered  
5 Professional Reporter and Notary Public in and  
6 for the Commonwealth of Massachusetts, do  
7 hereby certify that on February 1, 2017,  
8 MOHAMED AHMED BEN SOUD, the witness whose  
9 deposition is hereinbefore set forth, was duly  
10 sworn by me and that such deposition is a true  
11 record of the testimony given by the witness.

12 I further certify that I am neither  
13 related to or employed by any of the parties  
14 in or counsel to this action, nor am I  
15 financially interested in the action.

16 In witness whereof, I have hereunto  
17 set my hand and seal this 13th day of February  
18 2017.

19

20 Notary Public  
21 RPR No. 001420

22

23 My commission expires:

24 7 December 2023



<b>A</b>				
<b>Abd</b> 206:6,10	<b>administration</b> 245:9	<b>alabaster</b> 239:23	<b>answer</b> 182:12 183:21 184:8 188:9 194:10 198:3 199:2,18 200:17 201:3 206:21 207:7 211:12 213:10 217:11 220:2 225:5,14 229:3,13 232:6 249:2 258:4 263:16 264:6 271:3 272:20 275:8 277:22 279:17 283:6,13 284:24 287:19 288:2,12 292:22 293:8,18 294:6 298:14 300:9,21 301:5,19	<b>approved</b> 177:10 292:18 293:4,9
<b>Abdelhakim</b> 207:12 273:9	<b>administrative</b> 245:8	<b>Alexander</b> 175:19	188:9 194:10	<b>approximate</b> 277:1
<b>abdomen</b> 218:5	<b>adopted</b> 215:5	<b>Alhalabi</b> 176:3 189:11,22 190:15 197:7,13 227:19 227:21 235:10,13 236:20 237:13,16 243:21 274:8,10 278:22 283:20,23	198:3 199:2,18	<b>approximately</b> 260:16
<b>Abdullah</b> 173:5 185:19 207:17 305:4	<b>adopting</b> 215:3	<b>Allah's</b> 231:23	200:17 201:3	<b>April</b> 184:20,22 187:24 188:4,7 217:20 233:13 238:16
<b>able</b> 188:23 190:19 190:21 201:14 231:3 251:19 270:22 287:12	<b>adult</b> 263:1 264:1	<b>alleged</b> 206:5,5 209:3 212:6 219:23	206:21 207:7	<b>Arabic</b> 176:2,3 180:14 181:18 196:7,10,14,20 197:23 198:11,18 202:18,18 205:19 236:18 276:4,6 284:11,22 292:15
<b>absolutely</b> 204:19 236:20	<b>advise</b> 182:6 194:9	<b>Allen</b> 262:14 290:3 290:16,19	211:12 213:10	<b>area</b> 235:11 252:9
<b>Abu</b> 207:17 233:10 233:13 238:18 239:1 243:5,13 244:6 245:12,24 247:9 248:4 254:19 255:3,4,8 258:5	<b>affiliated</b> 182:9 186:19,23 207:19 207:20 208:9,12	<b>allow</b> 287:17 288:8	217:11 220:2	<b>armed</b> 202:19
<b>accept</b> 246:15	<b>affiliation</b> 182:7 206:24 208:1 229:6	<b>allowed</b> 216:8 288:18	225:5,14 229:3,13	<b>arrest</b> 292:8
<b>accuracy</b> 178:8,18 178:24	<b>afflicted</b> 265:4	<b>Al-Driki</b> 185:11 187:15 273:10	232:6 249:2 258:4	<b>arrested</b> 231:9
<b>accurate</b> 179:1	<b>Afghanistan</b> 183:17,19 184:3,6 184:14	<b>Al-Gaddafi</b> 263:7	263:16 264:6	<b>arrival</b> 231:5
<b>ACLU</b> 178:17 198:23 199:13 271:14 277:20 279:19 280:8	<b>afraid</b> 297:10	<b>al-Islamiyyah</b> 202:17	271:3 272:20	<b>arrive</b> 209:6
<b>ACLU's</b> 197:16	<b>afrey@gibbonsla...</b> 175:15	<b>Al-Jama'a</b> 202:17	275:8 277:22	<b>arrived</b> 182:20 184:18,20 192:2 222:2 296:21
<b>acquaintances</b> 257:24	<b>afternoon</b> 240:20 241:1	<b>al-Libi</b> 206:6,11	279:17 283:6,13	<b>arriving</b> 180:5
<b>act</b> 279:2 280:11	<b>age</b> 231:11	<b>al-Muhsin</b> 206:6,11	284:24 287:19	<b>article</b> 214:12
<b>acting</b> 213:6	<b>ago</b> 241:19,22	<b>al-Muqatilah</b> 202:17	288:2,12 292:22	<b>asked</b> 187:9 190:5 198:21 208:7 242:6 254:24
<b>action</b> 173:9 242:7 304:14,15	<b>agree</b> 179:7,10 189:21 190:14 194:18 197:16 198:16	<b>Al-Qaeda</b> 182:10 186:19,24 187:5,8 187:13,18 206:5 207:5,19,20,24 208:1,8,10,12,13	293:8,18 294:6 298:14 300:9,21 301:5,19	<b>asking</b> 204:24 205:5 244:4 303:3
<b>actions</b> 211:6	<b>agreeing</b> 212:16	<b>al-Sadiq</b> 207:17	301:5,19	<b>aspirin</b> 257:3
<b>activities</b> 232:3,12 232:13 253:19,21	<b>Ahmed</b> 173:6,15 174:4 177:2 178:3 181:8 304:8 305:5 305:21	<b>al-Sharif</b> 185:6 221:17,19 272:11 272:12 274:3,12 276:10,13 278:8	301:5,19	<b>associated</b> 229:1 239:17
<b>addition</b> 237:5 280:18	<b>Ain</b> 232:21,24 233:16 235:6,20 243:5	<b>America</b> 287:17,24 288:9 289:19	301:5,19	<b>assume</b> 293:13
<b>adhesive</b> 218:3	<b>air</b> 254:9	<b>American</b> 175:5 271:8 272:2 277:15 278:14 279:1 280:11 285:7 287:13 289:21	301:5,19	<b>assumed</b> 200:23
<b>administered</b> 193:17 216:11	<b>airport</b> 228:5	<b>and/or</b> 208:12	301:5,19	<b>assured</b> 300:12
<b>administering</b> 218:23 219:10	<b>airports</b> 228:7		301:5,19	<b>atrocities</b> 188:22

205:16 247:8,11	265:11,11,18	199:22 212:21	269:11 270:15	<b>Carter</b> 242:20,22
<b>attorneys</b> 283:2	266:14 268:2	213:17 220:4	281:17	243:1
284:9	270:19 280:2	237:22 255:12	<b>breakfast</b> 244:15	<b>case</b> 248:16 271:22
<b>August</b> 225:18	282:12,17 293:2	257:8 260:21	<b>brief</b> 195:7 220:7	277:7 278:10
226:1 285:14	302:23	283:20 288:18	220:12 230:7	281:13 289:9
286:21 290:8,20	<b>background</b>	299:10,21 300:5	270:18 282:11	305:4
290:23 295:22,23	223:10	300:10	302:22	<b>cause</b> 234:21
296:3 297:3	<b>bad</b> 249:17,18	<b>believed</b> 182:9	<b>bring</b> 180:23 261:6	262:18 264:19,21
<b>authorities</b> 225:22	258:18 260:24	298:6	<b>bringing</b> 197:11	<b>caused</b> 236:8,21
226:4,11 233:18	261:3	<b>belonged</b> 182:19	<b>Broad</b> 175:6	237:3,5 251:10
<b>authorize</b> 279:1	<b>Banadol</b> 256:20,22	<b>belonging</b> 232:4	<b>Brock</b> 294:13	264:11
280:10	<b>band</b> 218:2,3	<b>belongs</b> 182:18	<b>broke</b> 209:10	<b>causes</b> 260:24
<b>available</b> 196:16	<b>banging</b> 216:17	230:17 233:1	237:21	261:10
249:8	<b>bare</b> 222:16 227:9	<b>Ben</b> 173:6,15 174:4	<b>broken</b> 192:16	<b>causing</b> 223:11
<b>average</b> 250:17,18	<b>based</b> 299:12,16	177:2 178:3 180:2	211:15 212:8	<b>caution</b> 298:10
<b>Avram</b> 175:11	<b>Bashar</b> 176:3	181:8 194:10	220:21 291:11	<b>cell</b> 192:12,15
<b>awaited</b> 274:12	227:17	303:3 304:8 305:5	<b>Brook</b> 262:14	216:7 222:15
<b>awake</b> 216:20	<b>basically</b> 237:21	305:21	<b>brother</b> 246:12	244:20,23 268:7
<b>aware</b> 180:18 191:3	<b>basis</b> 190:20,23	<b>Benadryl</b> 256:21	<b>brothers</b> 246:6,6,7	<b>Center</b> 175:13
199:7 215:23	194:15 210:10,22	<b>better</b> 262:24	246:7	<b>certain</b> 204:18
217:14 222:6	211:14 212:5	263:24	<b>brought</b> 180:19	<b>certainly</b> 179:11
241:7 271:7 289:8	251:24 260:15	<b>beyond</b> 194:21	194:14 222:20	<b>certify</b> 304:7,12
292:11 294:2	298:13 300:5,14	282:2	<b>BRUCE</b> 173:12	<b>chained</b> 215:11
295:15 301:8,11	300:14,19 301:23	<b>Bill</b> 176:4	<b>built</b> 210:17	<b>chair</b> 179:8,9
<b>Ayoub</b> 185:6,9,10	<b>BBC</b> 214:15	<b>bit</b> 180:8 197:5	<b>B-A-N-D-O-L</b>	<b>challenging</b> 212:13
186:7,10,13,16,17	<b>bears</b> 202:1	251:17 253:11	256:24	<b>change</b> 216:8
187:13 273:10	<b>beaten</b> 230:19	281:17		<b>charge</b> 221:9
<b>A-B-U</b> 233:12	233:17 234:10,13	<b>bi-Libya</b> 202:17	<b>C</b>	<b>Charrise</b> 175:19
<b>A-I-N</b> 232:21	234:16	<b>black</b> 270:9,12	<b>C</b> 178:1	<b>check</b> 196:15,17
<b>A-L-D-R-I-K-I</b>	<b>beatings</b> 233:6,21	<b>BLANK</b> 175:20	<b>Calexander@Bla...</b>	<b>checks</b> 218:23,24
185:12	234:18,19,20,20	<b>blinded</b> 227:10	175:24	219:13
<b>A-S-H-A-R-E-E-F</b>	234:21 245:15	<b>blood</b> 235:3 237:5	<b>call</b> 227:6 232:4	<b>checkups</b> 219:13
185:9	<b>beginning</b> 198:9	238:9	<b>called</b> 181:9 183:7	<b>children</b> 240:7
<b>A-Y-O-U-B</b> 185:10	212:9	<b>bodily</b> 188:16	183:17,19 186:16	253:22 254:1
<b>a.m</b> 174:8	<b>begins</b> 178:2	235:19,22 236:1,4	232:20 233:10	<b>Chisholm</b> 294:13
	<b>begun</b> 289:17	236:10 237:7	238:17 244:6	294:16,19,22
<b>B</b>	<b>behalf</b> 175:2,17	238:11	272:5	295:6,16,21
<b>B</b> 177:7	271:10 279:2	<b>body</b> 222:7 248:22	<b>calls</b> 301:17	296:15
<b>back</b> 178:4 180:8	280:12 284:8	<b>bone</b> 291:11	<b>camera</b> 222:8,9	<b>CIA</b> 181:24 182:6
195:8 205:12	292:19 293:6	<b>Borrowman</b>	<b>captivity</b> 259:1	182:17,19 213:7
214:22 220:13	295:16 303:6,7	173:23 304:4	<b>captured</b> 274:23	218:14 221:11
228:12,12 230:8	<b>Belhadj</b> 207:12,19	<b>brands</b> 257:10	<b>car</b> 227:1,2 228:12	224:23 225:1,7
231:20,22 234:18	273:10	<b>break</b> 179:6 190:21	228:13	242:7 274:23
240:22 246:23	<b>belief</b> 210:10,22	191:8 194:9 195:3	<b>care</b> 211:24 212:3	<b>circumstances</b>
248:5 250:9,11,16	211:15,18 212:5	209:10 220:7,9,18	215:13 248:1	188:13 230:21
250:20,21,21,24	300:1	230:3 239:3	<b>carried</b> 254:15	231:14 235:5
251:3,11,13,23	<b>believe</b> 197:7	240:13 243:3	<b>cars</b> 228:13	292:8

<b>city</b> 239:5,10,10 247:2	265:1,5,7,8 268:3 268:23 270:7	258:16	<b>constant</b> 209:7 230:14 253:5 255:10	206:3 213:3 225:3 225:12,19 242:20 246:19 248:9 254:18,22 275:20 299:14
<b>civil</b> 173:9 175:5 271:8 277:9,9,14 277:15,15 278:2,6 278:11,14 279:2 280:11	298:3,19,20,22 299:3,4,11,19,23 300:3,12,16 301:3 301:13	<b>concerning</b> 193:21 211:23,24 213:8 258:17 272:1 274:22 296:21,22	<b>construction</b> 223:10 269:2,9	<b>correction</b> 186:12
<b>claim</b> 219:2	<b>cold</b> 192:12 251:9 251:10,21,21 252:22 253:2,8	<b>conclude</b> 211:5	<b>consultation</b> 258:6 258:8	<b>counsel</b> 178:23 181:9 185:22 281:23 286:13 304:14
<b>clarification</b> 202:24 236:14 238:5	<b>collapse</b> 209:8,11	<b>conclusion</b> 184:2 214:14	<b>contact</b> 185:18 276:11	<b>country</b> 183:12 262:19
<b>clarify</b> 195:1 204:1 204:7 237:24	<b>collective</b> 235:9 244:11	<b>Conclusions</b> 177:9	<b>contacted</b> 272:12	<b>couple</b> 179:23 281:18
<b>clarifying</b> 204:10 204:13 282:4	<b>come</b> 184:2 214:13 232:11 255:18 265:1 288:19 289:5,14,18,24	<b>condition</b> 190:24 216:24 254:18 255:6 259:6 290:18 291:3,22 292:1,4 294:15 297:7,9	<b>contained</b> 199:23 200:5 201:23 210:20	<b>course</b> 231:6 241:4 241:16 259:3
<b>cleaning</b> 247:19	<b>comes</b> 259:14	<b>conditions</b> 188:5,10 192:18 193:10 217:3,15 221:24 223:19,22 224:4 224:10 230:12 232:23 243:12 244:5 258:2 264:3 286:7,9	<b>container</b> 227:7	<b>court</b> 173:1 197:2 243:15,17,18,23 269:7 271:11 280:1 282:12,14 302:20
<b>cleanliness</b> 215:14	<b>coming</b> 260:22	<b>confer</b> 179:6	<b>contains</b> 200:11,14	<b>cruel</b> 215:6
<b>clean-up</b> 180:11	<b>command</b> 206:7	<b>confinement</b> 189:13 230:15,22 230:23 235:6,7,16 244:6,10,17,18	<b>contend</b> 209:16 219:16	<b>cruelly</b> 226:21
<b>clear</b> 179:20 278:9	<b>commission</b> 304:23	<b>confronted</b> 188:6	<b>content</b> 298:12	<b>CSR</b> 173:23
<b>cleared</b> 281:19	<b>committed</b> 264:1	<b>confused</b> 249:2	<b>contention</b> 224:10	<b>cudgels</b> 234:18
<b>client</b> 281:24	<b>committee</b> 177:9 193:22 195:19 201:1 300:18	<b>Congress</b> 193:23 195:19	<b>context</b> 250:1	<b>cut</b> 226:23 236:21 236:22 237:4,6,8 237:12,18,18,19 237:20,21 238:2,8
<b>closest</b> 262:10	<b>Commonwealth</b> 304:1,6	<b>connected</b> 277:24	<b>continue</b> 216:23 251:13 256:6	
<b>closing</b> 218:2	<b>communicate</b> 271:19	<b>connection</b> 211:19 211:21 232:2 288:19	<b>continued</b> 177:3 181:13 215:13 216:4,9,12,13,20 216:24 218:5 224:7,9 252:17 254:16	<b>D</b>
<b>clothes</b> 192:10 216:9 218:1 222:4 222:20 226:23 227:1,8 267:15 270:10,12	<b>communicated</b> 271:16 272:11	<b>consider</b> 178:9 179:12 263:20 293:10	<b>continuous</b> 216:13 224:8 250:17 251:4,7,15 256:3	<b>D</b> 175:11 177:1 178:1
<b>Cobalt</b> 182:21 183:2,3,7,19 184:2,6,16,20,22 185:2,14,18 187:21 193:1,3,7 209:21 210:2,11 210:15,23 211:7 211:23 214:2,23 215:10 218:15,17 219:19 220:19 221:2 223:20,23 224:3,5,18 236:2 236:5,11 237:8 238:14 249:17,19 251:6,14 252:16 252:17 254:7,13 255:20,23,24 256:2,6 259:2,18 260:22 261:19	<b>communicating</b> 271:13	<b>considerable</b> 200:21	<b>continuously</b> 216:10	<b>daily</b> 231:15 262:1
	<b>communication</b> 225:7,11 276:12 277:10,12 278:1,5 278:9	<b>considered</b> 192:1 250:22	<b>conversations</b> 298:13	<b>dark</b> 192:12
	<b>companies</b> 239:20	<b>considering</b> 178:11	<b>conviction</b> 210:17 211:3 219:18	<b>darkness</b> 188:23 215:14 224:8 235:17
	<b>companion</b> 217:10	<b>consistent</b> 269:18	<b>coordination</b> 225:9 225:12	<b>date</b> 174:7 198:14 202:1 275:2,23 276:21,23 289:8 289:11 305:4
	<b>company</b> 239:21,23 240:4		<b>copy</b> 196:7,8,10,14 196:14 201:22 203:15 274:13 275:19 284:7,10 284:21 285:2 292:16	<b>daughter</b> 231:10 246:5
	<b>complaint</b> 177:12 284:8,11,22		<b>correct</b> 180:21 200:11,14,19,23	<b>day</b> 178:2,11 188:24 191:4,4 229:10,16 230:24
	<b>complete</b> 237:18			
	<b>completed</b> 179:13			
	<b>completely</b> 213:7 227:9			
	<b>concerned</b> 258:15			



231:1 244:15	231:14 232:23	<b>dig</b> 238:3	<b>document</b> 177:11	300:1,15 301:1,8
245:5,17 289:19	234:15 243:12	<b>dignity</b> 188:17	196:6,23 198:24	302:1,5
293:21 295:8,8,9	261:24 266:23	217:23 265:3	199:5 201:17	<b>due</b> 191:21
304:17 305:23	274:20	<b>dinner</b> 244:16	202:1,6 203:15	<b>duly</b> 181:11 304:9
<b>days</b> 183:5 184:17	<b>described</b> 188:15	<b>direct</b> 205:16 208:3	204:3,20	<b>duration</b> 227:15
193:19 205:3	209:18 217:16	211:18,21 276:11	<b>documents</b> 194:19	
222:20 226:19	219:21 223:20,23	<b>directly</b> 281:11	<b>doing</b> 232:14	<b>E</b>
241:19,22 247:17	224:5 258:2	303:5	299:12	<b>E</b> 177:1,7 178:1,1
247:18 256:5	269:17	<b>disagreeing</b> 212:17	<b>Dominica</b> 174:6	305:2
290:24 291:1	<b>describing</b> 201:23	<b>discourse</b> 208:3	241:3	<b>ears</b> 218:2 227:11
292:2	<b>description</b> 177:8	<b>discovered</b> 214:20	<b>door</b> 216:17 267:5	291:10
<b>DC</b> 175:22	202:19	<b>discuss</b> 286:12	268:11 270:3	<b>easier</b> 191:9
<b>deafening</b> 189:4	<b>deserve</b> 263:20	292:3,7 296:15	<b>Dr</b> 193:1,3,5,6,9,10	<b>east</b> 239:13
<b>December</b> 304:24	<b>design</b> 209:24	<b>discussed</b> 279:19	193:13,14 209:2,3	<b>Eastern</b> 173:2
<b>decision</b> 226:3,7,10	<b>designed</b> 193:14	284:3 286:12	211:11,19 212:4,6	271:11
243:24 263:24	209:5,17 210:3,12	<b>discussion</b> 186:8	212:6 213:12,18	<b>effect</b> 266:13
<b>decisions</b> 224:19	210:24 211:16	236:23 238:7	213:22,24 214:6,6	<b>efforts</b> 285:4
225:1	213:22 219:23	240:1 257:7 282:2	214:9,18 215:23	289:17,23
<b>decreased</b> 216:6	299:23	287:7,10	215:23 217:5,5,10	<b>eight</b> 285:12 290:6
261:18	<b>desire</b> 228:24	<b>discussions</b> 297:19	217:14,14 219:24	<b>eighth</b> 285:12
<b>defendants</b> 173:13	<b>despair</b> 209:7	<b>disruption</b> 216:13	225:8 226:8,9,13	297:1
175:17 181:10	<b>detail</b> 209:1	216:13,15,17	226:14 241:10,23	<b>either</b> 180:17
<b>degradation</b> 219:1	<b>detained</b> 185:1,5	223:12	242:19,20,22	215:22 269:21
<b>degraded</b> 209:8	185:14,15 187:21	<b>distance</b> 265:24	243:1 262:14,14	<b>eleven</b> 220:10
<b>degrading</b> 217:21	188:6 210:23	<b>distributed</b> 292:2	290:3,19 291:22	<b>ELMER</b> 173:11
217:23	211:7 221:6,21	<b>District</b> 173:1,2	292:11,18 293:5	<b>email</b> 274:11 285:2
<b>degree</b> 256:8	224:6,22,23 242:6	197:2 271:10,11	293:13 294:13,16	<b>embassy</b> 285:7,21
<b>deliberately</b> 211:24	254:7 298:3 299:4	<b>distrust</b> 297:10	294:19,22 295:6	285:24 289:21
<b>Demand</b> 177:12	299:20	<b>disturbed</b> 297:8	295:16,21 296:15	<b>emotions</b> 209:11
<b>demonstrate</b>	<b>detainees</b> 214:1	<b>disturbing</b> 260:14	297:17,21 298:4,7	<b>employed</b> 304:13
178:16	274:24	<b>divulging</b> 279:18	298:9,19,22 299:3	<b>employee</b> 288:3
<b>dental</b> 248:1	<b>detainment</b> 222:1	<b>dizzy</b> 227:4	299:5,8	<b>encounter</b> 182:19
<b>dentist</b> 247:12,15	<b>devoted</b> 263:1	<b>doctor</b> 222:11	<b>dragged</b> 260:3	<b>encountered</b>
247:15,21 248:6,9	<b>dialogue</b> 194:1,4,5	240:15 247:5,16	270:2	232:24
<b>Department</b> 233:3	<b>diaper</b> 217:24	248:7,12,13,21	<b>dragging</b> 270:5	<b>English</b> 186:14
<b>deposition</b> 173:15	<b>die</b> 209:12	249:3,7,10 250:8	<b>draw</b> 235:3	196:8 201:13
174:4 178:3 241:3	<b>died</b> 231:8	250:22 255:9,12	<b>dream</b> 267:24	202:5 203:15
274:16 285:6	<b>differ</b> 219:7	257:17,19,23	268:9,12 269:15	204:3,6 237:20
303:13,15 304:9	<b>different</b> 198:10	266:16,21 290:4	269:17,21,22	<b>ensue</b> 259:7
304:10 305:1	210:16,16,16	<b>doctors</b> 218:22	<b>dreamed</b> 268:2	<b>entering</b> 218:18
<b>depositions</b> 302:6	212:12 220:6	219:9,12,13 241:5	<b>dreams</b> 260:14,24	260:1
<b>deprivation</b> 188:19	241:5 259:24	249:5,8,12,13,15	269:18	<b>entire</b> 196:20
188:19 215:13	269:19,20,24	249:16,18,22	<b>dressed</b> 226:24	197:22 234:4
<b>deprived</b> 189:1	274:18 286:6,9	250:3 254:22	<b>Drs</b> 208:16 209:17	<b>entirely</b> 198:5
<b>describe</b> 188:5	<b>difficult</b> 188:13,14	257:21,23 258:1	210:4,13 211:1,5	<b>entity</b> 200:10,19,20
214:24 216:2,15	190:22,24 192:8,8	262:13 297:10	211:17 219:24	200:21
221:24 230:11,21	277:3	299:24	224:13 225:2	<b>ERRATA</b> 305:1

<b>erratic</b> 259:7	253:3,15 256:7,10	<b>family</b> 245:22,23	205:17,17,22	297:18
<b>erratically</b> 227:2	256:16 262:4,22	246:4	207:22 215:1	<b>forms</b> 194:15
<b>escape</b> 294:8	262:22 264:12	<b>far</b> 179:21	218:13 224:2	<b>Fort</b> 174:5
<b>especially</b> 249:23	300:11	<b>fast</b> 227:3,4	245:2 247:7	<b>forth</b> 304:9
<b>Esq</b> 175:3,4,11,18	<b>experienced</b> 190:20	<b>fear</b> 188:18 209:7	278:13 287:2	<b>forward</b> 196:18
175:19	217:3,15 230:12	259:9 262:3,20	<b>fits</b> 250:18	270:22
<b>established</b> 299:13	259:13 260:13	264:21,23 297:9	<b>five</b> 219:2,20 234:7	<b>found</b> 241:16 242:4
<b>et</b> 305:4	299:22	<b>fears</b> 296:23	238:24 243:10,16	242:16,23
<b>events</b> 215:24	<b>experiencing</b>	<b>February</b> 173:17	243:22 244:12	<b>Foundation</b> 175:5
<b>everyone's</b> 180:24	252:14 255:17,21	174:7 304:7,17	246:1 269:10	271:9
<b>evidence</b> 193:5,9	<b>expires</b> 304:23	305:4	295:7	<b>four</b> 221:23 222:1
215:22 217:4,13	<b>explain</b> 182:2	<b>feel</b> 209:9,9,18	<b>flashback</b> 265:9	222:18,21,22
225:11 226:8,13	237:17 256:4	249:22 253:17	<b>flee</b> 293:23 294:3	223:3 224:6,11,21
<b>evidences</b> 193:23	<b>exposed</b> 188:18,20	259:24 260:3	<b>flesh</b> 238:3	224:24 225:17
<b>exactly</b> 183:22	188:21,22 189:3,6	262:1 265:24	<b>Floor</b> 175:6	234:14 244:24
185:3 196:24	189:7,8 224:11,16	266:2,5 296:21,22	<b>focused</b> 244:5	246:11 275:15
198:13 223:16	224:17 252:21	<b>feeling</b> 209:8,8	<b>followed</b> 219:8	<b>fourth</b> 218:20
234:1 275:4	253:1,8	249:11 259:5,6	245:9	233:9
276:21,24 289:12	<b>expression</b> 197:8	262:2	<b>following</b> 183:4,16	<b>frequency</b> 261:17
<b>exam</b> 291:8 297:19	<b>extent</b> 188:14	<b>feelings</b> 261:21,24	183:23 184:12	<b>frequent</b> 247:16
<b>examination</b> 177:3	194:13,20 286:11	262:7,12,18	213:20 214:11,15	<b>frequently</b> 223:3
177:4 181:9,13	<b>Eye</b> 175:21	<b>fell</b> 294:9	271:22	233:17,23 245:23
241:16,24 303:1	<b>eyes</b> 218:2 227:10	<b>felt</b> 255:19,20,23	<b>follows</b> 181:12	250:15 252:19
<b>examinations</b>		264:24,24	280:3 282:18	253:3 256:1,14,16
241:6	<b>F</b>	<b>females</b> 246:6	293:3	<b>Frey</b> 175:11
<b>examined</b> 181:11	<b>faced</b> 188:11	<b>fierce</b> 215:7	<b>food</b> 188:18 215:13	<b>front</b> 202:6
222:12	<b>face-to-face</b> 279:7	<b>fifth</b> 218:22 243:23	<b>foot</b> 236:18 237:4,6	<b>fully</b> 265:19,22
<b>example</b> 292:7	<b>facility</b> 181:23	<b>Fighting</b> 177:11	237:8,11 252:9,10	<b>fun</b> 219:15 222:14
<b>exams</b> 291:5,18	182:4 183:9,10,12	182:8 201:24	265:14,18,19,19	<b>further</b> 242:9 255:5
292:5	221:10,22 224:21	202:16 246:13,15	265:22 266:1,3,18	302:14 303:9,11
<b>excerpts</b> 198:10	225:19 233:24	263:2 264:2	291:13,15	304:12
<b>execute</b> 193:15	238:13 243:5	273:12	<b>force</b> 192:15 206:8	<b>future</b> 262:2
<b>Executive</b> 177:10	244:14 268:3,22	<b>filed</b> 197:1 198:15	206:17 264:11	
<b>Exhibit</b> 195:23	298:24 299:7,19	198:19 271:9	266:8	<b>G</b>
196:1,5,21 197:24	<b>fact</b> 202:13	284:8,11	<b>forced</b> 192:9,16	<b>G</b> 178:1
198:12 199:9,15	<b>factor</b> 179:17	<b>filling</b> 247:20	212:1 216:18	<b>Gaddafi</b> 225:23
199:23 200:6	<b>factual</b> 194:15	<b>final</b> 180:5	217:24	226:6,6,15 228:24
201:10,13,22	211:4 300:14	<b>financially</b> 304:15	<b>forcibly</b> 215:18	229:7,11,18
202:11 274:16	<b>faint</b> 216:7	<b>find</b> 183:18 188:13	226:21 227:12	246:21 263:14,18
283:15,18 284:7	<b>fair</b> 181:4,5 194:23	242:11 250:23	260:2 267:6	263:20 272:3
300:7,17	243:19 248:18	<b>Finding</b> 177:9	268:11 270:3	275:1
<b>expected</b> 274:4	251:22 256:9	<b>fine</b> 205:10	<b>forcing</b> 211:15	<b>gain</b> 254:20
<b>expenses</b> 239:16	282:8	<b>finish</b> 269:5	212:2,7 215:19	<b>gained</b> 232:10
<b>experience</b> 191:22	<b>fairly</b> 178:8 241:13	<b>finished</b> 209:13	218:1	<b>gait</b> 266:9
193:13 208:23	242:2 243:1	<b>first</b> 182:16 192:1,2	<b>form</b> 247:8	<b>Gateway</b> 175:13
210:7,14 213:19	<b>false</b> 200:6	192:7,9 202:10,14	<b>formal</b> 200:9	<b>gathered</b> 273:14
251:3,23 252:2,19	<b>familiar</b> 207:12	203:1,5,6,17	<b>formed</b> 296:16,19	<b>general</b> 197:8,18

198:4 261:5 <b>getting</b> 191:11 <b>GIBBONS</b> 175:12 <b>give</b> 257:22 285:24 286:5 289:16 <b>given</b> 193:15 194:8 231:1 254:24 255:2 276:3 304:11 <b>giving</b> 286:16 300:5 <b>go</b> 180:8 185:7 205:12 206:4 212:11,11 214:22 220:6 226:6 231:18,20,22 240:16 246:23 247:1 248:5 270:22 286:23,23 286:24 287:3,4,12 302:16 <b>goal</b> 208:14 <b>goes</b> 194:21 258:17 <b>going</b> 196:4 201:20 203:23 204:8 211:12 217:11 220:5 237:22 240:14,15 250:22 262:19 272:18 281:16 282:3 292:22 298:10 301:18 <b>good</b> 181:15,16,17 190:15,16 204:17 241:1 251:20 <b>gotta</b> 185:7 <b>government</b> 221:9 285:23 287:16 288:8 <b>governmental</b> 200:10,20 <b>granite</b> 239:23 <b>grasp</b> 182:17,22 <b>great</b> 260:1 <b>group</b> 177:11 182:8 201:24 202:16,19 215:5 246:13,15 263:2 264:2	271:16,19 273:12 276:1 278:18 284:14,15 <b>guard</b> 237:10 268:10,13 <b>guarding</b> 268:22 <b>guards</b> 216:14 226:20 236:7,17 260:1 <b>guess</b> 181:23 <b>GUL</b> 173:8 <b>gush</b> 237:6 <b>gushed</b> 238:9 <hr/> <b>H</b> <b>H</b> 177:7 <b>hall</b> 222:3 <b>hand</b> 216:11 218:4 226:10 227:18 304:17 <b>handed</b> 213:12,17 218:13 225:23 226:5 228:10 272:2 274:24 <b>hands</b> 190:2,12 192:10 210:18 214:5 215:10,21 218:3 227:10 267:7 <b>hanged</b> 189:9,18 190:2,6,12 215:20 <b>hanging</b> 214:4 251:7 <b>happen</b> 218:11 262:3 268:9 <b>happened</b> 188:2 192:6 209:23 210:2,11 212:13 212:17 217:18 226:17 228:8 231:9 261:7 262:5 265:2 268:11 275:5 299:18 300:16 301:2,12 <b>happens</b> 252:1 <b>hard</b> 179:24 215:4 <b>harsh</b> 188:15	<b>hatch</b> 228:12,13 <b>hate</b> 249:13,15,16 <b>head</b> 215:1 230:18 234:24 <b>headache</b> 250:10 <b>headaches</b> 255:15 255:17,18,19,22 255:23 256:1,7,10 256:17,19 257:2 <b>heal</b> 254:17 <b>healed</b> 265:19,23 <b>health</b> 211:23 290:18 <b>hear</b> 253:12 268:24 269:7 287:9 302:8 302:10 <b>heard</b> 231:8 301:10 302:7 <b>Hearsay</b> 281:5 <b>heating</b> 251:20 <b>heel</b> 266:2 <b>held</b> 174:5 231:15 236:2 243:9 <b>helpful</b> 194:7 <b>hereinbefore</b> 304:9 <b>hereunto</b> 304:16 <b>Hina</b> 175:3 204:4 <b>hit</b> 234:24 <b>hold</b> 180:9 <b>holding</b> 215:18 <b>holds</b> 206:6 <b>home</b> 240:10 247:2 253:23 <b>hooded</b> 218:3 227:11 268:15 <b>horrible</b> 259:15 <b>hospital</b> 248:14 <b>Hotel</b> 174:5 <b>hour</b> 216:14,21,22 296:7,8 <b>hours</b> 273:20,20 292:2 295:7 <b>house</b> 239:18 240:8 293:23 <b>Hshamsi@aclu.o...</b> 175:9 <b>huge</b> 222:3	<b>human</b> 271:24 272:4,21 273:2 274:21 276:1 278:11 300:24 <b>humiliating</b> 217:21 <b>humiliation</b> 189:10 219:1 <b>hurt</b> 250:20 <b>hurting</b> 211:24 <hr/> <b>I</b> <b>Ibrahim</b> 176:2 <b>icy</b> 215:17 251:9,10 <b>idea</b> 271:21,22 <b>identification</b> 196:2 201:11 283:16 <b>identify</b> 201:21 <b>identities</b> 192:22 <b>II</b> 173:16 174:4 <b>image</b> 268:12,14 270:8 <b>images</b> 248:15,16 260:24 265:1 <b>imaginary</b> 218:24 <b>immediately</b> 228:11 <b>impact</b> 266:19 <b>implemented</b> 213:13 <b>imprisoned</b> 243:13 244:20 259:15,17 <b>imprisonments</b> 259:20 <b>improved</b> 254:12 <b>inaccurate</b> 179:21 <b>inaccurately</b> 179:3 <b>inaudible</b> 269:4 <b>incident</b> 265:13 <b>include</b> 206:5 <b>included</b> 212:7 <b>including</b> 215:16 217:22 <b>increase</b> 253:6 <b>increasing</b> 249:19 <b>Indies</b> 174:6 <b>indiscriminate</b>	234:20 <b>individual</b> 187:15 206:10 <b>inflammation</b> 250:10 254:3,4,6 254:12,23 255:6 255:10 <b>inflict</b> 219:1 <b>information</b> 194:14 200:12,15 211:4 232:10,13 279:18 279:18 286:12 301:18 <b>informed</b> 274:11 <b>inhuman</b> 209:9 <b>injuries</b> 235:19,22 236:1,4,10 238:12 259:1 <b>injury</b> 211:20 220:22 234:22 236:6,8,22 237:4 237:7,11,12 266:18 <b>input</b> 225:2 <b>inside</b> 222:3 254:19 <b>insomnia</b> 264:23 <b>instances</b> 258:18,18 <b>institution</b> 182:18 <b>instruct</b> 301:19 <b>instructions</b> 211:6 <b>insults</b> 215:18,19 <b>intelligence</b> 177:9 195:19 201:1 228:10 230:16,17 232:9 300:18 <b>intend</b> 289:5,14,16 <b>intention</b> 228:24 229:10 <b>interest</b> 178:7 179:17 <b>interested</b> 281:4,10 281:13 304:15 <b>interior</b> 233:2 <b>interject</b> 279:16 <b>internal</b> 233:3,4 237:12,14 <b>interpretation</b>
---	---	--	---	--

178:19 179:24 289:1 <b>interpreted</b> 179:4 <b>interpreter</b> 176:2,3 178:9,10,17 180:4 180:19,20,23 185:21,21,22 186:2,5,11,11 189:17 190:8,11 197:3,3,16,17 201:20 202:9 203:2,6,7,10,19 205:21,23 223:6,6 227:23,24 228:18 228:20 235:12,14 236:13,13,16 237:15 238:1,1,4 239:7 240:2,5 244:1 267:10,10 267:12,14 268:17 268:19 274:9 280:20 281:2 282:9 283:22 285:18 287:8,8 290:12 295:1 296:1 <b>interpreters</b> 178:15 179:6 <b>interpreter's</b> 179:8 <b>interrogated</b> 222:22,24 223:4 223:15,17 231:24 233:23 234:3,11 <b>interrogation</b> 215:3 224:9 230:14,24 231:17 231:19 270:2 <b>interrogations</b> 184:4,9 216:9 231:15 232:15 233:5,20 245:13 <b>interrogator</b> 182:21 231:19 <b>interrogators</b> 184:5 192:19,21 215:2 270:12 <b>interrupting</b> 205:1	205:2 <b>intervals</b> 250:12 <b>interview</b> 272:10 272:14 <b>interviewed</b> 272:7 272:8 <b>interviews</b> 275:16 <b>introduced</b> 222:11 277:8,8,11,13,19 278:1,6 <b>invaded</b> 188:17 <b>investigations</b> 193:22 <b>involved</b> 226:9 270:24 <b>iron</b> 180:11 192:11 222:21 236:9 237:9,10 <b>Islamic</b> 177:11 182:8 201:24 202:16,19 246:12 246:15 263:2 264:2 273:12 <b>issued</b> 200:9,19,24 274:6,6 <b>issues</b> 180:12 194:11,22 <b>Istanbul</b> 280:17 285:7,22,23 289:21 290:4 295:11 296:10	211:5,11,17,20 212:4,21 213:3,8 215:23 217:5,14 219:24 224:13 225:3 226:8,14 299:3,5,8,14 300:1,15 301:1,8 302:1,5 <b>Jessen's</b> 209:3 212:6 214:6 <b>Jim</b> 179:16 190:4 191:7 202:3 204:19 220:5 227:17,19 243:21 253:9 269:3 <b>Job</b> 173:24 <b>JOHN</b> 173:12 <b>join</b> 253:23 281:14 282:19 <b>joining</b> 208:8,12 281:4,10 <b>jokes</b> 219:14 222:13 250:2 <b>joking</b> 219:11 <b>journey</b> 227:16 <b>judgment</b> 243:16 <b>jumped</b> 294:8 <b>Jury</b> 177:12	253:1,15 <b>knees</b> 252:8,12,15 252:20 253:4 266:19 <b>knew</b> 182:16 183:16 184:12 193:6,10 211:9 213:20 214:7,11 217:5 226:14 278:2 287:1,1 296:17 <b>know</b> 178:21 183:10,12,14,14 183:15,22 184:1 185:3,20 186:6,7 186:9,12,16 187:2 187:22 188:24 191:2 192:21,22 193:12 194:16,19 197:11 199:11,19 200:1,4,8,10,11 200:12 201:6,9 204:21 206:9,10 206:13,14,22 207:8,9,21,23,24 208:2,7 213:5,11 213:24 214:3 216:1 217:17 221:1,2,4,10 223:16 225:6,9,15 226:7,12,16 231:10 232:11 245:7 250:3 257:11,21 258:10 258:12 265:9,22 266:15,20 268:21 268:24 270:6 273:16 274:11 281:14 282:18,20 282:23 283:1,2,4 283:8,8,10,14,21 283:24 286:2 287:5 289:12 298:16,18 300:22 301:6,14 302:18 <b>knowing</b> 189:2 <b>knowledge</b> 183:6	213:21 <b>known</b> 202:16 207:17 221:17 233:2 264:9 <b>knows</b> 204:6 <b>Koussa</b> 230:18 <b>K-H-L-E-D</b> 185:9
<b>L</b>				
<b>L</b> 175:19 <b>ladder</b> 227:13 <b>lady</b> 272:5 <b>land</b> 228:4 <b>landed</b> 228:5,22 229:10 <b>language</b> 202:5 204:3,7 <b>lasted</b> 192:3 243:22 <b>laughing</b> 219:10 <b>laughs</b> 219:14 <b>laughter</b> 250:1 <b>Laura</b> 272:5 276:11 277:23 <b>lawsuit</b> 194:16 197:1 198:15,19 271:1,9 281:4,10 281:15 282:19 283:11 284:3 301:9 <b>lawyer</b> 243:20 278:14 279:20 280:7 <b>lawyers</b> 193:24 194:2,4 195:14,18 196:12 198:23 199:13 271:16,19 277:8,11,20,24 278:2,6,18,19 279:3 283:4 284:14,15 298:8 298:17 302:1,8,11 303:6,7 <b>leader</b> 206:23 207:1 <b>leaders</b> 206:18 207:23 <b>leading</b> 244:13				

<b>lean</b> 266:10	230:15,17 232:9	204:2 273:1	<b>Massachusetts</b>	239:19 255:15
<b>leaning</b> 266:12	233:1,17 234:16	<b>loss</b> 254:14	304:1,6	293:11
<b>learn</b> 183:3	243:9 246:12,15	<b>lot</b> 188:22 232:10	<b>matter</b> 271:15	<b>met</b> 199:6 241:10
<b>learned</b> 228:6,15	246:20 263:2	<b>lots</b> 189:10	288:20 298:11	241:22 242:19,19
<b>leave</b> 181:2	264:2 270:11	<b>loud</b> 180:5 192:13	<b>meals</b> 231:1 244:14	262:14 271:24
<b>led</b> 208:23 210:8,14	273:11 274:23	215:12,12 216:12	244:15,16	274:1 279:3,5
<b>left</b> 181:21,22	<b>life</b> 208:24 210:8	224:7 253:10	<b>mean</b> 184:10	282:2 290:4,8,10
188:23 218:6	262:1 263:1 264:1	<b>lower</b> 250:21,21	200:14,18 204:17	290:19,23 294:14
221:2 231:11	265:3	265:11	236:19 237:15	295:20 296:3
238:13 250:6	<b>LIFG</b> 186:17,21	<b>lunch</b> 231:20,21	256:4 291:13	<b>metal</b> 192:11
251:14 252:8,13	187:5,16,20	240:16 243:3	<b>meaning</b> 216:17	<b>methods</b> 188:21
252:21,23 253:5	202:16 206:19	244:16	<b>means</b> 198:7,8	210:16 215:4,15
253:15 266:4	207:3,23 208:13		236:18 256:5	224:17 299:22
<b>leg</b> 192:16 211:16	229:6 232:2,3,4	<b>M</b>	<b>meant</b> 286:8	<b>middle</b> 267:18
211:21,24 212:8	232:13 283:10	<b>M</b> 173:23 175:4	<b>media</b> 183:4,16,23	<b>militant</b> 206:16,17
215:20 220:18,22	284:4	304:4	184:4,11 193:20	<b>militants</b> 206:5
222:16 224:1	<b>light</b> 216:6,7	<b>madam</b> 201:20	213:20 214:11	<b>mindful</b> 178:24
236:6,7,17,18,19	250:17 253:23	202:9 280:1	<b>medical</b> 212:3	<b>mingling</b> 261:4
237:4 252:8	<b>LINE</b> 305:6	282:14	247:8,11 291:3,5	<b>ministry</b> 233:1,2
291:12,13	<b>little</b> 180:8 185:7	<b>maintained</b> 235:20	291:8,10,18,22	<b>minute</b> 269:10
<b>legs</b> 189:9,15,19,23	197:4 243:10	238:12	292:1,4,5	<b>minutes</b> 302:16
190:7 192:10	251:17 253:11	<b>Majed</b> 185:10	<b>medication</b> 254:20	<b>Misrata</b> 239:5,10
215:11 218:4	281:17	186:21,21,23	255:13	240:4 247:2,3
227:10 250:9	<b>live</b> 239:3,18 240:7	187:8 273:10	<b>medications</b> 257:10	249:5,7
252:3,5,7	<b>lived</b> 209:21 239:14	<b>making</b> 219:15	<b>meet</b> 240:15 272:4	<b>missed</b> 189:12
<b>lesser</b> 256:8	239:15 260:22	222:14 224:19	272:6 273:14,19	<b>Mitchell</b> 173:11
<b>letting</b> 204:4	267:9	225:1 250:1	290:5 295:10	193:1,6,10,13
<b>let's</b> 188:4 190:1	<b>living</b> 239:17	<b>males</b> 246:6	<b>meeting</b> 182:16	208:16 209:17
195:22 197:19,19	244:24	<b>manipulated</b>	273:3,5,8,9,17,21	210:4,13,21 211:1
202:13 205:12	<b>LLP</b> 175:20	222:13 249:24	273:22 275:12	211:5,11,17,19
220:6,8 230:3	<b>located</b> 183:13,19	<b>manipulation</b>	277:6,16,18,19	212:4,21 213:3,8
240:16 248:5	239:11 240:4	188:16 217:22	279:7 280:8,10,14	213:12,18,22,24
270:14	<b>LOCATION</b> 174:5	218:8 219:3,6,20	280:19 290:16	214:9,18 215:23
<b>LFIG</b> 187:3	<b>locked</b> 245:1,3,6,7	<b>manner</b> 219:8	296:9 297:1	217:5,10,14
<b>Liberties</b> 175:5	<b>long</b> 184:16 189:7,9	234:15	<b>member</b> 187:3,16	219:24 224:13
271:9 278:14	189:19 190:3,12	<b>march</b> 179:14	207:24 246:12	225:2,8 226:9,13
279:2 280:11	190:13 214:5	294:20	<b>members</b> 187:5,20	298:4,7,9,19,22
<b>Libya</b> 206:7,15,17	216:23 221:21	<b>mark</b> 195:22 237:3	229:11 246:16	299:14 300:2,15
218:21 228:23	227:15 229:19	<b>marked</b> 196:2,5	271:24 273:11	301:1,8 302:1,5
229:5,10 238:17	231:7 238:20	197:24 199:9,15	284:4	305:4
244:5 270:6 272:7	239:14 247:14	200:6 201:11,12	<b>memories</b> 261:6	<b>Mitchell's</b> 209:2
276:18	254:6,8 265:24	203:3 274:15	<b>memory</b> 291:1	212:6 214:6
<b>Libyan</b> 177:11	273:19	283:16,18 284:6	295:12	<b>mode</b> 278:5
182:7 201:24	<b>longer</b> 256:10	300:7,17	<b>men</b> 222:5	<b>model</b> 249:18
202:15 206:14	266:10	<b>masked</b> 268:15,15	<b>mental</b> 296:19	<b>Mohamed</b> 173:6,15
225:21 226:4,10	<b>look</b> 255:7	268:17	<b>mentioned</b> 214:16	174:4 177:2 178:3
226:18 228:7,10	<b>looking</b> 191:10,12	<b>masks</b> 270:9,12	214:17 217:7	181:8 304:8 305:5

305:21	<b>naked</b> 189:6 217:22 217:24 222:5,12 222:17,19 226:24 226:24	<b>nightmares</b> 259:5 259:12,17 260:6,9 260:13,17 261:1 261:10,17 267:20 296:23 297:9	289:20	292:11,17 295:5 295:12,23 296:2,8 296:12 298:17 300:24 301:11,20 302:4,13
<b>moment</b> 189:11 208:11 229:5	<b>name</b> 183:10 185:23 186:3,4 201:7 206:10 239:21	<b>night's</b> 181:17 <b>nine</b> 231:11 <b>noise</b> 223:10,11 269:2,9	<b>obtained</b> 248:14 258:6	<b>Omission</b> 227:23 <b>once</b> 218:12 255:13 256:18 287:4
<b>month</b> 188:1,1 233:8,9 243:18,23 243:24 260:7,12 260:17 267:1,2 269:22,23 285:12 285:12 290:6 297:1,2	<b>named</b> 186:10,13 187:15 217:8	<b>nonresponsive</b> 211:13 217:12 292:23	<b>obviously</b> 241:7 273:17	<b>ones</b> 179:18 <b>open</b> 244:12 245:5 270:3
<b>monthly</b> 260:15	<b>names</b> 185:4,8,13 250:3 278:19	<b>nostrils</b> 254:11	<b>occasion</b> 271:18	<b>opinion</b> 211:2 219:22 299:16
<b>months</b> 191:5 221:23 222:1,18 222:21,23 223:3 224:6,12,21,24 225:17 229:21,22 229:23 231:11 235:8 243:16,22 245:2 250:19	<b>narrate</b> 190:22	<b>Notary</b> 304:5,20 305:25	<b>occasions</b> 219:21	<b>opinions</b> 296:16,18 297:18
<b>month-by-month</b> 190:20,23	<b>National</b> 233:3	<b>notes</b> 302:16 NW 175:21	<b>occurred</b> 194:3 215:24	<b>opportunity</b> 229:17 <b>opposed</b> 270:7 <b>opposition</b> 199:7 199:14,20
<b>morning</b> 181:15,16 231:17 245:4	<b>nearly</b> 192:3 216:21 221:23 230:24 234:7 235:7 246:3 256:18 260:14,18 285:13,15 290:24 294:20 296:7	<b>Ob</b> 178:1	<b>October</b> 198:16 271:8	<b>optimism</b> 209:12
<b>mother</b> 231:4 239:18 240:10 246:5	<b>need</b> 204:7 249:3 257:12,17,18 281:17,18 282:5	<b>OBAID</b> 173:6	<b>Oh</b> 203:6 265:8 282:5,8	<b>order</b> 230:4 300:6 <b>ordered</b> 300:2,15 301:1
<b>Moussa</b> 230:18	<b>needed</b> 248:21 249:7 250:7	<b>object</b> 281:16	<b>okay</b> 180:13,16 184:22 186:2 187:24 191:6,13 192:4 196:9 198:15 201:16 203:4 204:6,12,17 205:12 207:11 211:4 220:8,8 221:1,20 222:22 225:17 227:23 229:24 237:16 239:21 240:12 242:15 244:1,2 246:23 247:3 248:5,18 254:3 260:19 263:8 265:8 267:4,23 268:2 270:14 273:7 274:1,20 275:2,5,22 276:14 276:22 278:13 279:1 280:21 281:9,22 282:8 284:15,19 285:4 285:16 287:22 288:17 289:17 290:3,10,15,19 291:18,21 292:3	<b>orders</b> 213:6
<b>move</b> 179:18 217:11 227:2 292:22	<b>neither</b> 304:12	<b>objection</b> 182:11 183:20 184:7 187:9 188:8 198:2 199:1,10,17,24 200:7,16 201:2,18 202:23 203:13,20 206:20 207:6 213:9 220:1 225:4 225:13 229:2,12 234:6 248:23 256:11 258:3 261:2 263:15 264:5 271:2 272:19,20 275:7 277:21 281:5 283:5,12 284:23 286:10 287:18 288:1,11,21,23 293:7,17 294:5 300:8,20 301:4,17	<b>Oh</b> 203:6 265:8 282:5,8	<b>organization</b> 272:16,23 273:1 277:9,14 278:3,7 278:11
<b>moved</b> 219:9 225:18 229:24 269:3,9	<b>never</b> 208:11 248:20 251:1 265:2 286:21 292:17 293:4,14	<b>objectionable</b> 241:17 242:5,12 242:14,17,23	<b>official</b> 200:9,20	<b>organizer</b> 206:6 207:5
<b>movement</b> 264:10	<b>Nevine</b> 176:2	<b>obtain</b> 251:19 287:3,11,13	<b>officials</b> 226:18 234:16	<b>organs</b> 217:23 218:9 219:3,11 222:13
<b>movements</b> 253:7 259:7	<b>new</b> 175:7,7,14 188:12 215:3,15 218:17,19 219:9 232:20 305:2,2		<b>officials</b> 226:18 234:16	<b>outside</b> 192:14 <b>overturning</b> 229:7 <b>over-the-counter</b> 257:12,15
<b>moving</b> 178:8	<b>Newark</b> 175:14		<b>Oh</b> 203:6 265:8 282:5,8	<b>owns</b> 240:10
<b>music</b> 189:4 192:13 215:12,12 216:12 224:7	<b>news</b> 183:17 184:11 214:12 231:6 261:3		<b>okay</b> 180:13,16 184:22 186:2 187:24 191:6,13 192:4 196:9 198:15 201:16 203:4 204:6,12,17 205:12 207:11 211:4 220:8,8 221:1,20 222:22 225:17 227:23 229:24 237:16 239:21 240:12 242:15 244:1,2 246:23 247:3 248:5,18 254:3 260:19 263:8 265:8 267:4,23 268:2 270:14 273:7 274:1,20 275:2,5,22 276:14 276:22 278:13 279:1 280:21 281:9,22 282:8 284:15,19 285:4 285:16 287:22 288:17 289:17 290:3,10,15,19 291:18,21 292:3	<b>o'clock</b> 220:11
<b>mutual</b> 193:24	<b>night</b> 188:24 191:3 245:6,7 261:12 267:18		<b>Oh</b> 203:6 265:8 282:5,8	
<b>M-A-J-E-D</b> 185:11	<b>nightmare</b> 259:22 260:20 261:12,14 266:24,24 267:4 267:19 269:24		<b>officials</b> 226:18 234:16	
<b>M-O-U-S-T-R-A...</b> 239:7			<b>Oh</b> 203:6 265:8 282:5,8	
<b>N</b>			<b>Oh</b> 203:6 265:8 282:5,8	
<b>N</b> 177:1 178:1			<b>Oh</b> 203:6 265:8 282:5,8	

252:8,10,12,14,17	244:24 263:5,5,6	<b>pertains</b> 301:16	256:23 293:1	251:22 254:4
252:19,21,23	263:9,9,11,13,14	<b>Peter</b> 272:5 276:12	298:14	256:9 287:15
253:3,5,15,17	263:17,19,20	277:23	<b>point</b> 204:18 209:7	288:17
266:1,2,6	270:5,9 299:11	<b>Peters</b> 273:3,8,15	243:4 279:14	<b>press</b> 266:1
<b>painkiller</b> 257:2	300:2	275:12,20 276:9	280:3	<b>prevent</b> 209:12
<b>pains</b> 249:19	<b>perceived</b> 237:18	276:14 278:5	<b>police</b> 218:14	<b>prevented</b> 243:19
<b>Pakistan</b> 206:15	<b>perform</b> 231:22	<b>pharmacies</b> 257:11	220:23 265:14	<b>previous</b> 290:6
<b>Pakistani</b> 218:14	253:7	<b>pharmacy</b> 257:16	291:16 292:9	<b>previously</b> 181:7
220:23 265:13	<b>performed</b> 241:5	<b>phone</b> 278:8	293:22,24 294:4	181:10 289:20
291:16 292:9	<b>performing</b> 189:1,2	<b>phonetic</b> 208:8	<b>political</b> 262:20	<b>pride</b> 217:23
293:22	252:22	<b>photographed</b>	<b>pose</b> 302:17	<b>print</b> 202:1
<b>Panadol</b> 256:20	<b>period</b> 185:14,17	222:8,9	<b>position</b> 206:7	<b>prior</b> 269:21
257:1,22	191:24 192:24	<b>pick</b> 181:19,21	251:8	294:16
<b>paracetamol</b> 257:4	216:5 217:2	<b>pipe</b> 204:16	<b>positions</b> 189:8,16	<b>prison</b> 182:21
257:6,8,9,20	224:24 234:4	<b>pipes</b> 234:19	<b>possible</b> 249:10,11	184:20 208:24
<b>paragraph</b> 202:10	245:4,4,5,11	<b>Pitman</b> 241:23	286:16	209:21 211:23
202:14 203:18	247:10,17 265:1	242:19	<b>Possibly</b> 282:23	216:5 228:16
205:17	266:11 273:20	<b>place</b> 182:17,20,23	<b>pouring</b> 215:17	229:19 230:13
<b>part</b> 178:10 186:17	282:1 298:2	183:6,17,18	<b>practicing</b> 242:10	232:20,24 233:9
186:21,23 203:3	<b>periodic</b> 251:23	184:13 188:12	<b>pray</b> 253:6	235:9,11,13,14
207:3 210:3,24	<b>periodically</b> 251:16	191:17,18 192:2	<b>prayer</b> 189:2	238:17,21 243:5,9
211:12,16 214:5	252:1	192:19,20 196:4	231:22,23 252:22	243:14 244:6,11
219:16,19,23	<b>periods</b> 189:7,9,19	217:19 218:6,6,17	<b>prayers</b> 240:14	244:12,19,23
224:12 239:11	190:12 214:5	218:17,19 219:9	<b>praying</b> 253:7,17	245:10,18,24
262:24 264:1,9	233:8 267:21	221:5 222:2,12	253:18	246:18,22,24
273:17 283:10	<b>permission</b> 205:1	226:20 227:16	<b>precise</b> 180:2	247:4,22 248:2,3
299:20	289:18	228:7,15 230:17	<b>precisely</b> 214:3	248:4,6,19 249:17
<b>participate</b> 253:19	<b>person</b> 185:20	230:20 233:1,6	289:13	250:6 251:6
283:1	186:6,7,9,13	259:15 267:5,6,7	<b>prepared</b> 199:14	252:16 254:19,21
<b>participation</b> 263:1	188:17 206:14,23	267:8 277:16	208:17 211:11,20	255:3,4,8,12,20
<b>particular</b> 208:14	206:24 207:14	280:14 296:10	212:4 213:12	255:24 256:2
214:12 275:23	221:8 232:5	299:12	214:18 217:9	258:6,20 260:22
<b>parties</b> 304:13	258:16 262:10	<b>placed</b> 284:6	224:12 264:10	261:4,7 265:4,6,7
<b>parts</b> 222:7,9	277:17 286:14	<b>Plaintiffs</b> 173:9	274:21 275:24	265:8 270:1,7,11
249:24	300:24	175:2	292:11,18 293:5	298:9 300:11
<b>passed</b> 210:15	<b>personal</b> 173:7	<b>plane</b> 218:7 221:12	295:15	<b>prisoner</b> 235:20,23
243:17 262:22	191:22 193:12	227:12,14,14	<b>prescription</b>	236:2,11 238:13
<b>passing</b> 193:19	208:23 210:7	228:1,4,5,9,23	257:13,17,19,21	238:24 245:12
<b>pause</b> 195:7 220:12	211:1,3 213:19	<b>plastic</b> 234:19	<b>present</b> 176:1	249:20,20
230:7 270:18	219:22 299:16	<b>play</b> 253:21 254:1	228:23 229:9	<b>prisoners</b> 214:19
282:11 302:22	300:11	<b>played</b> 249:18	273:7 280:18,21	272:1 274:22
<b>paying</b> 283:2,4,10	<b>personally</b> 209:20	301:12	280:23 284:18,21	<b>prisons</b> 226:6 272:2
<b>pays</b> 239:16	209:23	<b>please</b> 179:4 185:8	287:2 290:11	<b>private</b> 194:5 222:7
<b>pending</b> 195:12	<b>personnel</b> 230:16	186:3 202:9	294:21 295:23	222:9 249:24
202:4 282:15	<b>persons</b> 187:23	205:15 207:11	<b>presented</b> 285:2	<b>privilege</b> 194:8,11
<b>people</b> 185:1,4	232:4,12 261:4	228:17 233:11	286:15	279:20 298:13
192:17 213:2,5,13	<b>pertaining</b> 248:22	238:5 239:6,24	<b>presently</b> 239:3	<b>privileged</b> 301:18

<b>problems</b> 265:11	290:15	<b>reaction</b> 249:21,22	<b>recount</b> 190:19	<b>repeatedly</b> 230:24
<b>procedure</b> 245:8	<b>pursue</b> 297:15,21	<b>read</b> 193:21 197:18	<b>recur</b> 252:21	<b>repetition</b> 223:5
<b>procedures</b> 217:21	<b>pursuing</b> 208:14	198:4,8,9,11,14	<b>recurs</b> 253:2	262:21 267:12
<b>proceed</b> 179:9	<b>pushed</b> 267:6	201:14,21 202:24	<b>REF</b> 305:5	<b>report</b> 193:21
188:1 220:16	268:10 270:3	203:2,5 280:2	<b>refer</b> 217:3	195:18 197:23
226:22	<b>put</b> 178:5 192:12	282:17 293:2	<b>reference</b> 216:16	198:19 200:5,9
<b>proceeds</b> 227:7	227:9	<b>Reading</b> 245:19	220:21	214:12 262:7
<b>process</b> 226:22	<b>putting</b> 217:24	<b>ready</b> 220:16	<b>reflect</b> 202:5 205:5	274:4,5,13,15,18
<b>profession</b> 242:9	<b>P-A-R-C</b> 257:6	302:19	<b>reflected</b> 180:3,6	274:20,21 275:3,6
<b>Professional</b> 304:5	<b>P-A-R-C-E-T-M-...</b>	<b>real</b> 210:8,14	<b>regime</b> 225:23	275:20,24 276:3,6
<b>program</b> 193:15,16	257:7	<b>reason</b> 286:24	226:6,15 229:1,7	276:8,19 290:17
208:17,20 209:3,4	<b>P.C</b> 175:12	287:2 288:14,15	229:11 263:7,14	292:12,14,15,18
209:16 210:3,12	<b>p.m</b> 303:15	<b>reasons</b> 279:20	272:3 275:1	293:4,10,15
210:24 211:9,16		286:4,4	<b>Registered</b> 304:4	295:15,18 300:7
212:7 213:15,22	<b>Q</b>	<b>recall</b> 185:13,16	<b>related</b> 265:12	300:12,19
214:6,8,8,16,17	<b>Qibla</b> 189:3	189:14,22 196:24	304:13	<b>Reported</b> 173:22
214:20 219:17,19	<b>question</b> 178:18	198:14 218:9	<b>relating</b> 292:12	<b>reporter</b> 269:7
219:23 224:12	186:9 190:6	234:1 241:24	<b>relation</b> 232:1	280:1 282:14
299:13,20,23	194:11 195:11	243:6 267:23	265:17	304:5
<b>promised</b> 188:12	202:3,4,14,21	275:23	<b>release</b> 226:3	<b>reports</b> 184:11
<b>promptly</b> 180:24	203:12 205:13,15	<b>receipt</b> 275:6	<b>released</b> 226:5	<b>Representative</b>
<b>prone</b> 188:16	212:10 253:10	<b>receive</b> 243:19	238:21,22 239:15	173:8
<b>pronounced</b> 256:20	263:23 271:5	244:14 247:11	246:18 247:9	<b>representatives</b>
<b>proposal</b> 178:6,12	272:20 275:10	254:9	248:19 258:20	271:14
<b>protect</b> 251:20	279:22 280:1	<b>received</b> 233:6	261:19	<b>respect</b> 180:1
<b>provide</b> 196:18	282:15 283:3	247:7 248:1	<b>relied</b> 184:1	<b>respond</b> 286:11
<b>provided</b> 196:13	293:1 302:3	274:13	<b>relying</b> 194:14	<b>response</b> 199:8,15
<b>psyche</b> 297:8	<b>questioning</b> 232:2	<b>recognize</b> 196:6	214:13	<b>responsible</b> 264:3
<b>psychiatrist</b> 258:12	<b>questions</b> 232:3,6	231:13	<b>remain</b> 222:19	268:22
258:14 294:14,17	242:8,11,13,16	<b>recommend</b> 297:12	229:19	<b>rest</b> 181:17
<b>psychiatrists</b>	279:17 302:14,17	297:21	<b>remained</b> 184:22	<b>result</b> 210:12
258:21	303:4,9,11	<b>record</b> 178:4,6,14	261:18	255:14 259:1
<b>psychological</b>	<b>quick</b> 272:19	178:15 179:1,21	<b>remember</b> 187:6	275:5 297:18
258:17,18,24	<b>quickly</b> 179:10,13	180:7 186:12	195:11,15 198:13	<b>resulted</b> 249:21
259:6 264:3	227:3 243:17	194:13 195:6,9	208:18 264:16	<b>retaining</b> 243:20
294:15 297:8	<b>quote</b> 202:14,15	201:22 202:4	269:14 273:24	<b>revealing</b> 298:11
<b>psychologist</b>	<b>Quran</b> 245:19	204:8,14 205:5,9	274:3 275:2,22,24	298:12
258:10	<b>Q-E-B-L-A</b> 189:3	220:11,13 230:6,8	276:21,23 277:3,3	<b>review</b> 197:22
<b>public</b> 235:11,12	<b>R</b>	240:16,18,23	279:22 289:12	198:21,23 199:5
235:13,14 244:12	<b>R</b> 178:1	270:17,19 273:21	291:8,20,21	199:14 300:6
244:19 304:5,20	<b>RAHMAN</b> 173:8	280:2 281:23	<b>repeat</b> 185:23	<b>reviewed</b> 196:20
305:25	<b>raise</b> 197:4	282:10,12,17	201:7 203:7	198:18 293:14
<b>publicly</b> 196:16	<b>raising</b> 194:11	284:7 293:2	205:15 212:10	295:18
<b>published</b> 274:6,9	227:17	294:10 302:21,23	223:7 279:24	<b>revolution</b> 246:20
<b>punching</b> 215:18	<b>reach</b> 209:6	303:14 304:11	282:15 288:24	<b>revolutionary</b>
234:17	<b>reached</b> 227:16	<b>recorded</b> 273:23	292:24	264:10
<b>purpose</b> 218:24		<b>record's</b> 204:15	<b>repeated</b> 262:3	<b>rid</b> 263:6



<b>right</b> 191:13 194:16 194:19 201:14 202:20 205:21 221:1 238:11 241:8,11 243:10 247:22 252:24 253:1 263:3,5 267:24 268:3 269:1 275:12,15 277:9 278:3 288:20 293:16	<b>sander</b> 223:13 <b>sanding</b> 223:14 <b>saw</b> 196:9 247:12 247:21 248:5,7,9 248:12,13 267:5 268:14 269:24 292:15 <b>saying</b> 189:15,23 200:4,23 210:1 237:2 251:10 260:16 261:9 <b>says</b> 202:15,21 206:4 <b>scene</b> 260:21 <b>scenes</b> 260:21 <b>seal</b> 304:17 <b>seaside</b> 239:12 <b>seat</b> 227:22,24 <b>seats</b> 227:14 <b>second</b> 207:11 215:5 218:16 277:10,12,19 <b>security</b> 233:3,4,4 <b>see</b> 179:6,15 181:3 193:1,3 195:3 202:15,20 203:12 203:14,15,17,21 205:19 240:12 247:5 248:21 249:3,7 250:7,22 258:21 268:12 276:6 281:11 292:15 298:3,19 299:1,4,8 302:17 <b>seeing</b> 179:17 <b>seek</b> 254:21 255:5 <b>seen</b> 196:7 201:16 249:17 258:1 292:14 297:24 298:9 <b>seep</b> 254:10 <b>segment</b> 267:14 <b>Select</b> 177:9 200:24 300:6,18 <b>Senate</b> 177:9 197:22 198:19 200:5,24 300:6,18	<b>sensation</b> 254:15 <b>sent</b> 196:17 274:5 <b>sentence</b> 203:1,5,7 203:18 205:17,22 206:4 <b>separate</b> 269:4,10 275:16 <b>September</b> 181:23 184:18 <b>SERVICES</b> 305:1 <b>SESSION</b> 240:20 <b>set</b> 289:9 304:9,17 <b>seventh</b> 243:18,24 <b>severe</b> 215:4 <b>sexual</b> 217:22 218:9 219:3,11,20 222:13 <b>shackle</b> 236:9 237:9,10 <b>shackled</b> 189:7,18 192:10 215:10 218:4,5 222:16 223:24 227:21,24 251:8 259:16 260:1,4 267:8 268:5 <b>shackles</b> 192:11,11 222:4,21 227:9 <b>shackling</b> 189:14 216:6,10 224:8 251:7 <b>Shamsi</b> 175:3 177:4 178:5 179:16,22 180:15,21 181:5 182:11 183:20 184:7 187:9 188:8 190:4,9 191:7,13 194:7,18,24 196:15 198:2 199:1,10,17,24 200:7,16 201:2,18 202:2,23 203:13 203:20,23 204:1 204:10,13,19,22 205:4,10 206:20 207:6 213:9 220:1 220:5 225:4,13	227:17 229:2,12 234:6 248:23 253:9 256:11 258:3 261:2 263:15 264:5 268:16,18 269:3,8 271:2 272:18 275:7 277:21 279:16 281:5,16 282:1,7 283:5,12 284:23 286:10 287:18 288:1,11 288:21,23 293:7 293:17 294:5 298:10 300:8,20 301:4,17 302:15 303:2,8 <b>share</b> 179:18 296:18,20,24 297:17 <b>Sharif</b> 221:20 272:14 275:14 280:21 281:1,4,9 281:23 <b>SHEET</b> 305:1 <b>Shield</b> 206:7 <b>shifted</b> 218:15 <b>shipped</b> 218:20 <b>shock</b> 209:7 <b>shooting</b> 231:9 264:15 <b>shootouts</b> 264:15 <b>short</b> 182:19 218:1 228:6 <b>shot</b> 220:23 252:10 265:13,20 266:3 291:15 293:24 294:9 <b>shoulders</b> 234:17 <b>shoved</b> 227:12 228:12 <b>show</b> 194:6 195:17 195:20 201:12 283:18 <b>showed</b> 277:7 284:13 293:22 <b>shower</b> 216:8	<b>shown</b> 193:24 194:2,20 195:14 195:18 196:11,23 284:10,17 <b>sic</b> 185:9 187:3 189:3 202:10 239:8 240:2,5 247:20 256:22,24 257:7 272:5 276:12 277:23 <b>sideways</b> 266:12 <b>similar</b> 257:3 262:5 <b>simple</b> 254:2 264:22 <b>single</b> 208:11 <b>sinus</b> 250:10 254:3 254:4,6,12,22 255:6,6 258:7 291:11 <b>sinuses</b> 291:11 <b>sir</b> 179:2 196:6 210:9 214:4 216:2 219:4,21 246:19 259:13 271:7 274:16 285:4 <b>sisters</b> 246:10 <b>sit</b> 227:13 <b>sitting</b> 245:20 <b>situation</b> 262:20 <b>skim</b> 197:9,24 <b>skimming</b> 196:22 <b>skin</b> 237:21,21 238:4 <b>slamming</b> 215:17 <b>slapping</b> 234:17,17 <b>Slater</b> 176:4 <b>sleep</b> 188:19 259:14 <b>slower</b> 185:7 <b>smelling</b> 254:15 <b>smelly</b> 254:8 <b>Smith</b> 175:18 177:3 178:7,11,13 179:19 180:13,16 180:22 181:14 182:14 183:24 184:15 185:24 186:4,14 187:12
<b>S</b>				
<b>S</b> 177:7 178:1 <b>Saleh</b> 185:11 187:15 273:10 <b>Salim</b> 173:5 185:19 185:24 186:2,3,5 233:10,14 238:18 239:1 243:5,13 244:7 245:12,24 247:9 248:4 254:19 255:3,4,9 258:6 305:4 <b>Sami</b> 273:10				

189:21,24 190:14 190:18 191:11,19 194:12,23 195:2 195:10,22 196:3 196:13,19 197:6,7 197:10,15,19,21 198:6 199:4,12,21 200:3,13,22 201:5 201:19 202:7,8 203:4,11,16,22,24 204:4,12,15,21,24 205:8,11,22 206:1 207:2,10 213:16 220:8,15 223:8,13 223:18 225:10,16 227:20 228:3,21 229:8,15 230:3,10 234:9 235:15 236:15,24 238:6 238:10 240:12,24 244:2,3 249:1 253:13,14 256:13 258:9 261:8 263:22 264:8 267:11,16 268:20 269:5,12,13 270:14,21 271:6 272:22 274:14 275:11 278:4 279:21,24 281:8 281:20,22 282:5,8 282:14,21 283:9 283:17 284:1 285:3 286:18 287:14,21 288:6 288:16 289:4 292:24 293:12,20 294:10,12 298:15 300:13,23 301:7 301:20,22 302:13 302:18 303:3,10 <b>Smith-JT@Blan...</b> 175:23 <b>sold</b> 257:10,12 <b>sole</b> 301:23 <b>solitary</b> 189:12,12 189:12 230:15,22	230:23 235:7,16 244:9,17,18 <b>son</b> 246:5 <b>soon</b> 182:20 222:2 <b>sorry</b> 190:4 221:18 233:4 237:17 243:21 249:2,14 257:5 269:8 276:22 286:15 288:23 <b>sort</b> 179:23 180:11 291:8 <b>Soud</b> 173:6,15 174:4 177:2 178:3 180:2 181:8,15 190:19 193:18 194:10 195:11,22 196:1,5,20,21 197:22,24 198:11 198:15 199:9,15 199:23 200:6 201:10,12,22 202:10 208:16 210:1 211:14 212:12 220:18 228:22 229:9 230:11 237:8 239:4 241:1,2,22 244:4 262:24 267:17 268:21 269:14 270:22,24 283:15 284:2 287:15 293:21 297:24 298:16 303:3,10 304:8 305:5,21 <b>source</b> 184:1 302:10 <b>speak</b> 178:19 179:4 180:13 253:11 262:11 274:2 276:8,14,19 294:10 <b>specialist</b> 258:15 <b>specific</b> 194:19 211:6 <b>specifics</b> 209:2,16	<b>spell</b> 185:7 228:17 233:11 239:6,24 256:23 <b>spend</b> 263:24 290:22 291:24 295:5 296:5 <b>spent</b> 241:23 262:24 <b>spirit</b> 209:11 <b>spoke</b> 178:21 294:21 <b>spoken</b> 272:9 <b>sporting</b> 253:19,21 <b>sports</b> 253:23,24 254:1 <b>squatting</b> 251:8 <b>SS</b> 304:2 <b>stage</b> 192:1,2,5,5,7 192:8,9 214:24 215:1 216:3,4 217:4,9,15,18 223:20,23,24 224:2,3,5 <b>stages</b> 191:16,17,17 191:20,23 210:16 214:23 <b>stand</b> 216:18 222:3 <b>standing</b> 212:1,1 222:6 <b>stark</b> 222:5 <b>start</b> 187:24 188:4 251:2 252:14 255:17,21 271:13 <b>started</b> 215:15 226:21,22 227:2,8 289:23 <b>Starting</b> 251:5 <b>state</b> 178:14 194:12 296:19 <b>statement</b> 189:20 <b>States</b> 173:1 182:8 197:2 271:10 285:5 287:16,17 287:23,24 288:8,9 289:18,24 <b>stay</b> 238:20 258:5 <b>stayed</b> 216:5	222:16,21 232:21 235:7 <b>steel</b> 192:11 <b>stepped</b> 229:5 <b>steps</b> 223:14 227:13 254:17 297:15 <b>Steven</b> 175:4 278:21,22,23 282:4,6 290:12,13 <b>stick</b> 235:1 <b>sticks</b> 234:18 <b>stood</b> 236:7,17 237:10 243:15 <b>stop</b> 202:20 204:5,9 220:8 <b>stopped</b> 227:3,4 <b>story</b> 190:23 <b>Street</b> 174:5 175:6 175:21 305:2 <b>strenuous</b> 189:8 <b>strike</b> 211:12 217:11 246:23 258:23 292:22 298:1 <b>stronger</b> 250:18 <b>struggling</b> 178:23 <b>subject</b> 245:12,15 296:4,5 298:11 <b>subjected</b> 192:17 193:11 223:19,22 224:4 <b>Subscribed</b> 305:22 <b>substituted</b> 179:7 <b>suffer</b> 224:16 236:8 <b>suffered</b> 189:10 237:11 254:14 258:24 <b>SUFFOLK</b> 304:2 <b>suggesting</b> 234:2 <b>Suite</b> 305:2 <b>Suleiman</b> 173:5 185:19,23 186:5 305:4 <b>Summary</b> 177:10 <b>sun</b> 231:2 <b>support</b> 187:8,13 187:18	<b>supported</b> 187:5 <b>sure</b> 185:24 197:6 205:16 216:19 236:15 238:6 253:13 267:11,17 269:12 271:7 281:18 <b>surrounded</b> 219:14 <b>surrounding</b> 263:18 <b>surroundings</b> 191:1 <b>sustain</b> 235:19,22 236:1,4 238:11 <b>sustained</b> 220:22 <b>sworn</b> 181:7,11 301:9 304:10 305:22 <b>sympathy</b> 277:7 <b>system</b> 246:21 251:20 <b>S-A-L-E-H</b> 185:12 <b>S-A-L-I-M</b> 186:1 233:12 <b>S-I-T-I</b> 240:5 <b>S-L</b> 185:11 <hr/> <b>T</b> <b>T</b> 175:18 177:7 <b>Tajora</b> 228:16,18 228:19,20 229:20 229:24 230:1,13 231:16 235:23 <b>take</b> 191:7 192:9 194:9 195:3 211:6 220:6,9 230:3 231:21 256:19 257:14,20 269:10 270:14 280:14 281:17 288:17 292:17 293:3 302:15 <b>taken</b> 181:22 182:4 183:8 221:2,5,12 222:10,15 227:6 230:23 232:20 243:23 254:17
--	---	--	--	--

285:6 297:14	<b>tests</b> 291:10	273:20 275:14	<b>times</b> 178:21 191:2	<b>training</b> 263:6,13
<b>takes</b> 179:15 181:4	<b>thank</b> 241:21	290:24 291:1	218:12,13 219:2	<b>transcript</b> 180:7,11
<b>talk</b> 191:8,15	303:10	295:2,3	223:1,2,16,17,17	<b>transfer</b> 202:10
257:23 261:9	<b>Thanks</b> 302:15	<b>threw</b> 227:5	233:7,19 234:1,2	<b>transferred</b> 188:11
277:4 278:17	<b>theory</b> 210:20	<b>throwing</b> 215:16,19	234:4,8,13,14	217:19,20 219:7
282:5 294:19	<b>thing</b> 211:9	<b>Tibisti</b> 239:23	244:15 246:1	228:14 230:1
295:21 296:2,14	<b>things</b> 178:8 179:9	240:3	253:17	232:19 233:8,13
298:6,22 299:1,4	179:23 195:15	<b>tiers</b> 207:22	<b>today</b> 180:9,10	235:9 238:17
299:8	204:16 212:13	<b>till</b> 203:2 205:21	203:19 239:15	243:4,14
<b>talked</b> 262:9,13	213:2,6 262:9	208:15 218:6	241:10 248:20	<b>translate</b> 190:5
276:10,23 277:1,4	264:22,23 281:18	222:5 226:23	253:16 284:16	205:18
277:6 278:13,18	282:4 283:7	227:4,8 229:4	297:24 303:13	<b>translated</b> 203:19
278:20 279:14	299:11 300:3,16	231:20 232:22	<b>told</b> 182:15,21	<b>translation</b> 182:1
280:4,7 291:2,3	301:2	233:8 238:21	184:5,11 187:4	186:8,15 190:17
292:20 294:14,16	<b>think</b> 178:22 179:3	239:15 251:15,15	193:18 194:17	196:16,21 202:22
295:3,13,22,24	179:17,20,22	254:16 290:2	207:14 209:22	203:9,24 205:6,20
296:12 298:8,16	180:1 191:21	<b>time</b> 174:8 178:4,16	210:6 211:10	212:15,23 223:9
<b>talking</b> 261:5,6	194:8,21 223:13	183:8,14 185:2,15	214:10 215:2	228:2 236:23
264:4 291:24	224:14,15,19	185:17 188:24	217:7 230:16	238:7 240:1
296:17	225:1 243:8 245:8	189:4,19 190:3,13	232:11 237:7	241:18 257:6
<b>tape</b> 273:21,23	251:12 260:19	191:24 192:13,14	255:9 264:14,16	267:13 281:21
<b>teach</b> 263:9,10	261:1 263:24	192:15,15 193:6	269:15 272:12	287:7,10 288:22
<b>team</b> 196:11	264:9,14 265:15	193:11 195:5,9	274:4 278:10	289:2 301:21
<b>teeth</b> 247:11 258:7	265:17 266:13,16	196:9 211:22	291:19,21 296:20	<b>TRANSPERFECT</b>
258:8	266:18,21 269:21	214:5 216:24	297:14 301:15	305:1
<b>tell</b> 184:10 185:4	272:16 273:9	217:2 218:13,16	302:2	<b>travel</b> 227:7
192:6 198:7	281:7 290:8,9	218:18,20,22,23	<b>tool</b> 263:18	<b>treat</b> 241:13 242:2
200:14 208:20	299:18	220:10,14 227:15	<b>tools</b> 210:17	243:1 255:11
209:1 237:1	<b>thinking</b> 180:4	228:22 229:4	<b>tooth</b> 247:19	<b>treated</b> 214:1
259:12 267:4	<b>third</b> 216:2,4	230:5,9 231:7,12	<b>tooths</b> 247:20	<b>treating</b> 258:16
281:9,11 285:4	218:18	231:20,23 232:9	<b>top</b> 206:16 216:21	<b>treatment</b> 224:20
297:5 301:1,3	<b>thought</b> 178:17	232:17 234:4,10	216:21,22	254:24 255:1,2,5
<b>telling</b> 184:5	181:1 208:8,9,11	240:17,23 241:23	<b>topic</b> 220:6 261:5,6	258:19 297:12,15
<b>ten</b> 247:17,18	231:7 242:8	246:2 247:7,24	269:4,10	297:22
<b>tension</b> 259:5	248:20 250:7	248:7,11,13,19	<b>toppling</b> 246:21	<b>trial</b> 177:12 243:19
<b>term</b> 258:11	263:12 267:6	250:6 253:2,2	<b>torture</b> 188:21	243:22 244:4
<b>terms</b> 298:11	286:3	254:8 255:18,19	191:17 215:17	288:20 289:6,8,11
<b>testified</b> 181:11	<b>thoughts</b> 296:24	260:5,8,10,10,11	224:17 263:19	289:15 290:1
243:8 294:2	<b>thousand</b> 285:10	260:12,16 261:14	299:22	<b>tribe</b> 268:21
301:11 302:5	<b>threats</b> 188:18	266:11,23 270:16	<b>tortured</b> 236:7	<b>tried</b> 289:20 294:8
<b>testify</b> 288:19 289:5	<b>three</b> 191:22	270:20 278:13	254:10	<b>trigger</b> 260:23
289:14,24	214:23 215:6,8,9	279:3 282:9,13	<b>torturing</b> 249:20	<b>triggers</b> 260:20
<b>testimony</b> 214:4	217:4,9,16,18	286:17,19,23	<b>totally</b> 196:22	261:1
219:22 287:22	218:12,13 224:3,5	290:22 291:24	226:24	<b>Tripoli</b> 239:13
288:10 289:16	231:1 234:4,14	295:5,20,22 296:5	<b>touched</b> 232:16	<b>true</b> 199:23 200:6
294:7 301:9,16,24	235:8 241:5	298:2,18 302:20	<b>tough</b> 192:5	206:2 236:20
304:11	244:15 250:19	302:24 303:14	<b>train</b> 263:5	304:10

<b>truth</b> 293:11,14	287:15,23 288:7	245:23 249:10	212:12 226:9	200:1,8,18 201:4
<b>truthfully</b> 232:6	301:23 302:4	<b>visited</b> 246:4	232:16 239:12	203:14,21 205:2
<b>try</b> 254:17,22	<b>understood</b> 238:2	247:15	255:11 262:21	205:12,16,24
<b>trying</b> 178:10 210:9	290:17	<b>visiting</b> 249:12	264:2 265:12	206:22 207:8
212:20	<b>undone</b> 222:4	<b>visitors</b> 245:21	269:24	213:11 220:3
<b>Turkey</b> 280:15,16	<b>Unfortunately</b>	<b>voice</b> 197:4	<b>ways</b> 259:24	223:11,15 225:6
295:11	231:12 254:14	<b>Volume</b> 173:16	<b>wear</b> 218:1 270:9	225:15 228:19
<b>Turkish</b> 287:3,12	<b>Union</b> 175:5 271:9	174:4 177:2	270:11	229:4,14 234:7
<b>Turn</b> 207:11	278:15 279:2	303:13	<b>wearing</b> 267:15	237:1 238:8
<b>turned</b> 225:21	280:11	<b>vs</b> 173:10	270:9	248:24 256:12
226:14,17	<b>United</b> 173:1 182:8		<b>week</b> 192:24 231:2	258:5 261:3
<b>twice</b> 231:2 256:18	197:2 271:10	<b>W</b>	231:5 256:5,18	263:17 264:7
<b>two</b> 178:2,14 179:5	285:5 287:16,17	<b>wake</b> 216:17	261:13,15 267:1,1	271:4 272:21
179:7,10 192:3,7	287:23,24 288:7,9	267:18,21,21	267:2,3 269:22	275:9 277:23
192:24 214:24	289:18,24	<b>walk</b> 192:16 211:15	<b>weeks</b> 192:3,7	281:7 282:16,20
223:23,24 228:11	<b>unreal</b> 219:13	212:2,7 215:19,19	215:6,8,9	283:7,14 285:1
234:3 235:8	<b>unrelated</b> 213:7	265:24 266:8,10	<b>weight</b> 200:21	286:14 287:11,20
242:16 247:10,21	<b>unsettled</b> 262:20	266:11	<b>went</b> 191:16,18	288:3,13,24 289:3
248:8 273:20,20	<b>unsteady</b> 266:8	<b>wall</b> 192:12 215:12	218:16 221:16	293:1,9,19 294:7
285:10 292:2	<b>uprising</b> 246:20	215:16 216:12	230:14 233:5,7	300:10,22 301:6
294:24	<b>urge</b> 179:2	251:8	247:2,11 248:13	302:14 304:8,11
<b>types</b> 180:23	<b>urged</b> 178:19	<b>want</b> 179:1,12,19	251:13,19	304:16 305:5
<b>tyrant</b> 263:10	180:22	180:9 181:19,21	<b>weren't</b> 270:6	<b>women</b> 222:6
<b>T-A-J-O-R-A</b>	<b>USA</b> 182:22	187:24 188:1	<b>west</b> 174:6 239:13	246:16
228:18,20	<b>use</b> 188:21 215:15	194:24 202:4,9	<b>western/northern</b>	<b>word</b> 180:5 183:2,3
<b>T-I-B</b> 240:3	254:20 264:10	298:16,18 302:15	239:11	<b>words</b> 180:2 206:9
<b>T-I-B-I-T-S-I</b>	<b>Usually</b> 256:20	<b>wanted</b> 178:5 203:4	<b>we'll</b> 179:15 181:3	<b>work</b> 195:3 239:18
240:2		282:22,23,24	195:3	239:19,22
	<b>V</b>	283:1	<b>we're</b> 178:4 190:15	<b>worries</b> 297:11
<b>U</b>	<b>v</b> 305:4	<b>Washington</b> 173:2	190:16 195:6,8	<b>worry</b> 259:9 262:2
<b>ULLAH</b> 173:7	<b>version</b> 197:23	175:22 271:11	220:11 230:6	<b>worst</b> 215:9
<b>uncomfortable</b>	198:11,18 274:12	<b>wasn't</b> 224:1 287:1	240:18,22 270:17	<b>written</b> 199:8 205:6
189:15	<b>victims</b> 193:16	<b>Watch</b> 272:1,4,21	282:10 302:20	297:6
<b>understand</b> 178:23	213:14	274:22 276:1	303:14	<b>wrong</b> 250:23
180:1 197:13	<b>Victoria</b> 174:5	<b>watched</b> 193:19	<b>we've</b> 196:4 241:2	<b>wrote</b> 273:22
198:22 203:17,22	<b>Videographer</b>	<b>watching</b> 222:7	<b>whereof</b> 304:16	292:21 293:13,15
205:13,19 208:20	176:4 178:2 195:5	261:3	<b>wife</b> 231:4,6 240:7	
209:1,4 210:9	195:8 220:10,13	<b>water</b> 215:17 236:6	246:5 262:9	<b>X</b>
212:9,12,14,16,18	230:5,8 240:17,22	251:9,10 254:10	<b>Wikipedia</b> 177:11	<b>x</b> 173:4,14 177:1,7
212:19,20,22,24	270:16,19 302:23	254:10	201:6,8,23	<b>x-ray</b> 248:15,16
262:17 267:17	303:12	<b>Watt</b> 175:4 278:22	<b>wish</b> 209:11	
271:4 272:23	<b>view</b> 197:12	278:23 279:10,15	<b>witness</b> 177:2 181:7	<b>Y</b>
275:9 283:3 286:8	<b>visa</b> 285:8,17,24	280:4,19 281:1	181:9 182:13	<b>yeah</b> 178:13 179:19
288:13,14,15	286:5,6,16,22	284:20,21 290:13	183:22 184:9	191:14 194:12
290:15 302:3	287:3,12,13	<b>way</b> 180:5 190:21	187:11 188:10	197:15,18 205:23
<b>understanding</b>	289:20,23 303:4	191:8 198:5 200:4	191:15 197:4,20	220:4 237:15
208:22 209:15	<b>visit</b> 231:3,4,12	202:13 209:18	198:4 199:3,11,19	244:1 269:5

281:22 282:7 <b>year</b> 184:17 245:3 245:4 246:2 285:10 290:7 <b>years</b> 238:24 243:10 245:2 247:10,21 248:8 250:13,14 <b>yellow</b> 203:3 <b>yesterday</b> 178:16 181:21,22 187:4 207:15 263:12 264:17 294:2,7 <b>York</b> 175:7,7 305:2 305:2 <b>Young</b> 174:5	<b>12:03</b> 230:9 <b>12:30</b> 240:13,14,17 <b>125</b> 175:6 <b>13th</b> 271:8 304:17 <b>17958</b> 173:24 305:5 <b>18th</b> 175:6 <b>181</b> 177:3 <b>1825</b> 175:21 <b>196</b> 177:10	175:8 <b>216</b> 305:2 <b>25th</b> 217:20 <b>283</b> 177:12		
<hr/> <b>Z</b> <hr/>	<hr/> <b>2</b> <hr/>	<hr/> <b>3</b> <hr/>		
<b>Zara</b> 232:21,24 233:16 235:6,20 243:5 <b>Zuckerman</b> 241:10 <b>Z-A-R-A</b> 232:21	<b>2</b> 177:2,11 201:10 201:13,22 202:11 303:13 <b>2:15-CV-286-JLQ</b> 173:10 <b>2:30</b> 240:23 <b>20</b> 305:23 <b>200</b> 239:12 <b>20006-5403</b> 175:22 <b>2003</b> 181:24 184:21 188:4,7 <b>2004</b> 225:18 226:1 <b>2005</b> 230:1,2 232:18 <b>2006</b> 232:22 233:13 238:16,16 <b>201</b> 177:11 <b>2011</b> 238:21,22 246:19 248:20 249:8 250:6 258:21 <b>2012</b> 273:6 274:2 275:17 277:6 <b>2015</b> 198:16 271:8 271:17,20 278:16 279:4,6,8 280:8 <b>2016</b> 249:8 250:6 285:10,11,14 290:8,20,23 294:20 296:3 <b>2017</b> 173:17 174:7 202:1 304:7,18 305:4 <b>2023</b> 304:24 <b>212</b> 305:3 <b>212-284-7321</b>	<b>3</b> 177:12 283:15,19 284:7 <b>3:51</b> 270:16 <b>303</b> 177:4	<hr/> <b>4</b> <hr/>	
		<b>4:01</b> 270:20 <b>4:28</b> 282:9 <b>4:39</b> 282:13 <b>400-8845</b> 305:3 <b>45th</b> 305:2	<hr/> <b>5</b> <hr/>	
		<b>5:27</b> 302:20 <b>5:38</b> 302:24 <b>5:39</b> 303:14,15	<hr/> <b>7</b> <hr/>	
<hr/> <b>#</b> <hr/>		<b>7</b> 304:24	<hr/> <b>8</b> <hr/>	
<b>#903</b> 305:2		<b>8:59</b> 174:8 178:4	<hr/> <b>9</b> <hr/>	
<hr/> <b>0</b> <hr/>		<b>9:41</b> 195:5 <b>9:48</b> 195:9		
<b>001420</b> 304:21 <b>03</b> 184:19 <b>04</b> 184:23 <b>07102-5310</b> 175:14				
<hr/> <b>1</b> <hr/>				
<b>1</b> 173:17 174:7 177:9 195:23 196:1,5,21 197:24 198:12 199:9,16 199:23 200:6 274:16 300:7,17 304:7 305:4 <b>1-31</b> 202:1 <b>10004</b> 175:7 <b>10017</b> 305:2 <b>11:21</b> 220:14 <b>11:48</b> 230:5 <b>12/13/12</b> 177:10				