

Middle East
For Trading & Investment
General - Trade
A. AIRachi's Sons Co.
Syria - Adra - Freezone
Tel : [REDACTED] - Mobile [REDACTED]

*Sale Contract
No. 0304*

First Party : [REDACTED]
Second Party : [REDACTED] of Swedish nationality

Both parties have agreed on the following :

On 14/07/2003, the First Party sold to the Second Party the car owned by him, Mercedes 300, model 1988, plate no. [REDACTED] chasis no. [REDACTED] at amount of **\$3,000 (only three thousand US Dollars)**.

The Second Party paid to the First Party the full amount. The Second Party agreed to purchase the car after checking it.

It was signed upon that

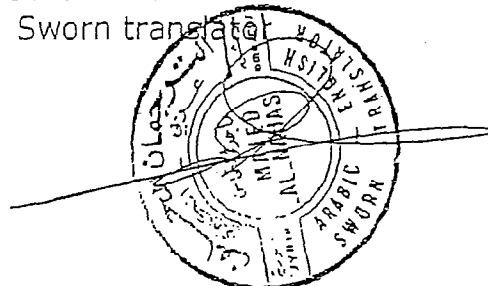
Note : The delivery shall be made inside the free zone in [REDACTED]

First Party (signature)
Second Party (signature)
Witness (signature)
Witness (signature)

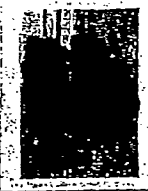
Middle East
A. AIRachi's Sons Co.
For Trading & Investment
(seal)

True translation from the attached document

Sworn translation



US



ID Number: [REDACTED] DOB: 1962/07/01
 [REDACTED] [REDACTED]
 Height (in): [REDACTED] Weight (lbs): [REDACTED] Hair: [REDACTED] UIC: [REDACTED]
 Sex: M ICRC: BCF
 Blood Type: [REDACTED] Date: 2009/11/26

N. [REDACTED]
ATTORNEYS AND COUNSELORS
[REDACTED]

[REDACTED]

FAX [REDACTED]

May 12, 2004

Via FedEx

Commander
U.S. Army Claims Service
Office of Judge Advocate General
4411 Llewellyn Avenue
Fort Meade, MD 20755-5360

RE: Claim of [REDACTED] for Detainee Mistreatment

Dear Commander:

This letter serves as a claim of our client, [REDACTED] pursuant to the Military Claims Act, 10 USC 2733 and 32 CFR Part 536. The claim is for compensation for torture and other mistreatment on account of and following his arrest in Baghdad, Iraq in September of 2003.

[REDACTED] an Iraqi, currently resides in Dearborn, Michigan, visiting and recovering with family and friends. He is a Swedish citizen. [REDACTED]s mother is an American citizen. A copy of his passport is enclosed. [REDACTED] was consistently a staunch advocate against the Baath Party and the Regime of Saddam Hussein. In fact, he was imprisoned in Abu Ghraib from 1980 to 1985 and tortured for his opposition to Saddam Hussein. [REDACTED] was again wanted by the regime of Saddam Hussein because of his continued opposition to the Baath Party and his assistance to the United States effort during the 1991 Gulf War. In fact, he was in the cities of Basra and Zubair distributing fliers to the Iraqi people encouraging resistance against Saddam Hussein's regime, and supporting the efforts of the United States.

After the 1991 Gulf War was won, Saddam Hussein's regime put a price tag on [REDACTED] head and destroyed his home in the city of El Muthana. [REDACTED] escaped to Saudi Arabia for approximately four years and then obtained refugee status in Sweden, eventually becoming a citizen. In Sweden, [REDACTED] continued to be a strong advocate and supporter for the United States and Mr. Hussein's removal.

[REDACTED]

U.S. Army Claims Service
May 12, 2004
Page 2

As you may be aware, after the regime fell, the United States was encouraging the return of Iraqi nationals to invest in their country. [REDACTED] was embarking on a new vision in 2003 after the topple of Saddam Hussein's regime, by returning to his country and investing in its economic future. He was going to purchase a home and invest in a mechanics shop or car outlet, such as a dealership. At the time he left for Iraq in September of 2003, he had in his possession his family savings of \$79,000, to be invested in a home and a business enterprise.

While he was driving his Mercedes in Iraq, on or about September 25, 2003, he was stopped by military personnel. One was named [REDACTED]. As he was trying to explain his presence, and that he was from Sweden, they told him to "shut up", and then they tied his hands with white plastic, put a black cover over his head, and placed him in the trunk of a vehicle. The money that he had in his car and his automobile were confiscated. [REDACTED] saw the money. Attached is a copy of the proof of ownership of his vehicle.

He was then imprisoned in El-Najaf for approximately 8 days. [REDACTED] was taken to a city in Dewaniya where he was subjected to beatings with a stick, along with other detainees, causing him to lose consciousness. [REDACTED] remained in Dewaniya for approximately two days, and was then taken to Abu Ghraib Prison (also known as the Baghdad Central Confinement Facility) on October 4, 2003, the same prison he was sent to by Saddam Hussein. See attached wrist bracelet showing his identification and the name of the camp. In that camp, Mr. [REDACTED] was subjected to horrific abuse and humiliation at the hands of American personnel.

In the prison, through an interpreter, [REDACTED] was asked where he was from and he advised that he was from Sweden. He was then told that he was a "liar". A uniformed man with a name sounding like [REDACTED] accompanied by an interpreter in a military uniform, stated that he was a lawyer and [REDACTED] was asked to sign an admission statement written in Arabic that he was against the United States. [REDACTED] came daily seeking [REDACTED] signature on the admission. Mr. [REDACTED] refused because it was not true. He was then threatened with torture and being shipped to Guantanamo Bay, and subjected to unspeakable and demoralizing acts, for his continued refusal to sign an admission statement.

AFI [REDACTED]
U.S. Army Claims Service

May 12, 2004

Page 3

[REDACTED] and 12 other naked prisoners were roped together by their genitals. A laughing guard then pushed one of the male detainees on the ground, causing the other detainees to suffer extreme physical, mental and emotional distress. They also stretched his penis with a rope and beat it with a stick. He was also stripped naked for periods of time, as long as a day and a half, with a hood over his head. He was forced to ejaculate in a plastic cup, with the semen being poured over his head and body. He was made to lay naked over another male with his penis touching the buttocks of the male, causing both males to cry profusely and ask for forgiveness from God. Cold water was then poured over them.

[REDACTED] was repeatedly shocked with an electric stick and beaten with a cable, and repeatedly made to stay awake by very loud music. Cold water was poured over him when he attempted to sleep and holes were ripped in the tents to let in the wind, causing severe chills. He was also subjected to dehumanizing name-calling by American personnel using Arabic phrases such as "minuk" which means "bitch" and "ishtah", meaning worthless scum, and being constantly called "gay".

On one occasion, a belt was tied around his neck and he was dragged approximately 70 feet. A dog was used to threaten and intimidate him. On several occasions, [REDACTED] was beaten and threatened with a pistol pressed to his head and his head was slammed against the wall.

In another episode, an American guard shot randomly at a crowd, killing approximately five prisoners, including an individual by the name of [REDACTED], whom [REDACTED] had befriended. [REDACTED] was shot in the neck and chest and left to bleed to death on the ground for a couple hours. Mr. [REDACTED] witnessed two men dying slowly, without being provided medical treatment. Chemicals from neon light fixtures were sprinkled on his body, causing him to itch.

In another incident, in one of the tents within the prison, two American guards stripped two young male prisoners, tied their hands, and raped them in front of [REDACTED] and other prisoners. The guards then warned the prisoners that if they told anyone, they would be next.

In another episode, three male Iraqi prisoners were stripped naked and hung by their hands from a hook in the ceiling, while a laughing guard beat on their genitals and sodomized them with a stick in front of other prisoners. [REDACTED] hands were tied above his head, with his heels barely touching the ground, while he was naked, and sodomized with a stick. [REDACTED] was made to lay naked on a chair with a hood on his head while his head was slapped back and forth and he was beaten with a cable while being called degrading names. On one occasion, he almost died from suffocation.

[REDACTED] was placed naked on a table, face down with a hood over his head, and American personnel grabbed his penis and inserted fingers up his anus. On two occasions, American personnel urinated on him. One detainee confided to [REDACTED] that he was forced to have sex with another male detainee.

Upon information and belief, local females were rounded up and imprisoned. For approximately 13 days, [REDACTED] heard constant screaming and crying at night from many females. [REDACTED] heard some females screaming "No! No! Shame on you! This is against God's laws". Although he did not see the acts, he is convinced they were being raped, by their cries and pleas.

In another episode, [REDACTED] was trying to call for prayer and was shot with plastic bullets to his chest, causing great pain. On many occasions, he experienced extreme hunger and thirst, and lost much weight from malnutrition.

He was ordered to carry feces from port-a-potties with American personnel bumping the bucket, causing it to be spilled on him, while they laughed. He was made to sleep on sand, without heat. On several occasions, because of the rain, he had to walk in mud which rose to his calves.

Most of the instances related above occurred before soldiers and plain-clothed American personnel.

When [REDACTED] was released, on or about December 23, 2003, one brave guard gave him the bracelet as evidence of his imprisonment and told [REDACTED] through an interpreter, to go to America to tell everyone what had happened and seek legal recourse. [REDACTED] was released along with two crying females, who looked to

[REDACTED]

U.S. Army Claims Service
May 12, 2004
Page 5

be about 16 and 70. After his release, [REDACTED] sought medical treatment in Syria. Dr [REDACTED] observed physical injuries to [REDACTED] left leg and right hand. [REDACTED] arrived in the United States on March 19, 2004. He is currently seeking psychiatric treatment in Michigan. He has been diagnosed with closed head injuries. The records of treatment will be furnished when they become available, to provide you with a better understanding of this claim.

As you know, a recent investigation was conducted of the 800th Military Police Brigade, which is commonly known as the Taguba Report. In that report, findings were made of unconscionable and unspeakable crimes against humanity perpetrated at the Abu Ghraib Detention Facility during the same time period [REDACTED] was detained.

My client has suffered extreme mental, physical and emotional injuries and distress as a result of the unspeakable crimes and extreme torture by American personnel, including but not limited to nightmares, insomnia, depression; loss of memory, headaches, and vision problems.

[REDACTED] is seeking return of his personal property, including his documents, \$79,000.00 in U.S. dollars, and his Mercedes, valued at \$3,000.00. He is also entitled to compensation for the pain and suffering and the mental and emotional distress which he has and will suffer for the rest of his life as a result of the unspeakable crimes against him. It is evident from the substance of this claim that the harm the U.S. Army inflicted on [REDACTED] far exceeds \$100,000.00 and is meritorious.

We hope that you treat this matter very seriously. The persons involved never deserved to wear a United States uniform. It would be unconscionable if my client is not adequately compensated.

Please call me to discuss possible settlement options. Thank you, and we look forward to hearing from you.

Very truly yours,

[REDACTED]

SHA/11
Enclosures



رقم ١٢٢٠٣٥
١٩

To whom it may concern:

I would like to inform you that [REDACTED]

[REDACTED] has an accident at 26 of september 2003 which has caused an injury of the iniiencephanly.

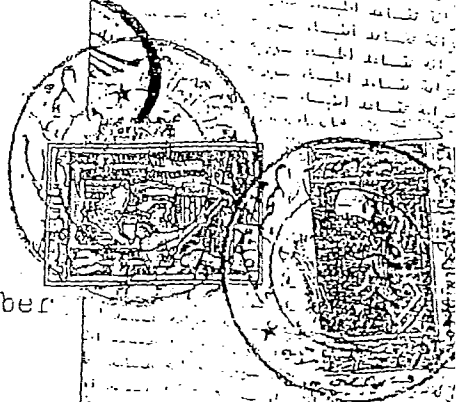
This injury affected the movement of his right hand and left leg about%30.

[REDACTED] started physical treatment in [REDACTED] clinic at 25.12.2003.

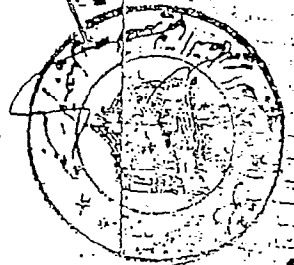
He achieved alittle improvement after six weeks till 15.2.2004 but he can not resume his work yet.

He needs along time for recovery.

[REDACTED]

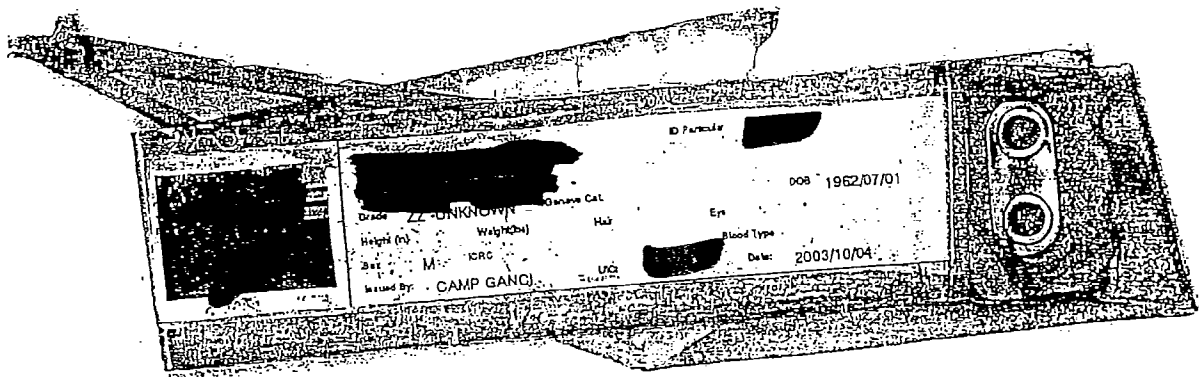


هذا التوقيع هو توقيع الطبيب
السيد [REDACTED] وان التوقيع
هذا التوقيع على مسؤولية السووية
رئيس في ١٢/٩/٢٠٠٣
أول طبيب تحية السبل في مستشفى [REDACTED]



١٩ ٦٩٧٩٠٤٠

تفريظي



4411 LLEWELLYN AVENUE



DEPARTMENT OF THE ARMY
U.S. ARMY CLAIMS SERVICE
OFFICE OF THE JUDGE ADVOCATE GENERAL
4411 LLEWELLYN AVENUE
FORT GEORGE G. MEADE, MARYLAND 20755-5360



MAY 25 2004
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 24, 2004

Foreign Torts Branch

Subject: Claim of [REDACTED]

[REDACTED]

Huntington Woods, MI 48070-1332

Dear Mr. [REDACTED]

This letter acknowledges receipt on May 18, 2004 of the claim and accompanying documents you submitted related to the above-captioned claim of your client, [REDACTED] against the United States in the amount of \$100,000. The claim alleges that United States military personnel in Iraq mistreated and tortured your client in Abu Ghraib prison after his arrest in Baghdad, Iraq, from September to December 2003.

You submitted this claim under the Military Claims Act (MCA) Title 10, United States Code, Section 2733, as you allege [REDACTED] is a resident of the United States and the claim arose in Iraq. However, there is no evidence in the documents you submitted that [REDACTED] was a resident in the US before he went to Iraq. This is required in order to be adjudicated under the MCA. Absent prove of residence prior to his going to Iraq in September 2003, this claim will be adjudicated under the Foreign Claims Act (FCA), Title 10, United States Code, Section 2734.

If we receive proof of US residency, we will adjudicate the claim under the MCA. The MCA is a purely administrative remedy; no judicial remedy is available under the MCA. Unfavorable action on the claim may be appealed to higher authority. Under the MCA, attorney fees are limited to 20 percent of any settlement and are paid by the claimant out of the settlement. The claims investigation will be informal. There are no depositions or other formal discovery procedures required or followed under the MCA. I will contact you concerning the specifics of the investigation.

Alternatively, absent receipt of proof of residence, this Service will process your client's claim under the FCA. The FCA is purely an administrative remedy; no judicial remedy is

available under the FCA. A Foreign Claims Commission (FCC) will adjudicate the claim. Under the FCA, the claims investigation will also be informal; there are no depositions or other formal discovery procedures required or followed.

In addition, the law requires that a claimant sign the claim or provide written authority for someone else to sign on his behalf. I am enclosing a standard form (SF) 95 for your use. Please complete the relevant portions of the form and have your client sign the SF 95 where indicated. Alternatively, please provide a signed authorization from your client for you or someone else to sign the claim form on his behalf.

The MCA requires that the alleged Government tortfeasors be acting within the scope of their authority when they cause injury to a claimant. Some of the conduct you allege occurred appears to be clearly outside the scope of duty required of a military member to arrest and detain someone. Please explain why you believe that this conduct falls within the coverage of the MCA. We are in receipt of some of the factual allegations of his claim; could you please have him explain and itemize the claimed damages, including the \$79,000.00 in cash he claims was lost and an itemization of the personal property which was taken.

If this Service adjudicates the claim under the FCA, the FCC will notify you of the proposed final action on your client's claim no later than 30 days before taking final action. If you are dissatisfied with it, during that 30 day period, you may request (in writing) that the FCC reconsider its proposed final action. The FCC's final action on your claim cannot be appealed.

If you have any questions, you may contact me at [REDACTED] extension [REDACTED]. Please refer to your claim number in all correspondence.

Sincerely,

[REDACTED]
Lieutenant Colonel, US Army
Chief, Foreign Torts Branch

Enclosure

Office of the Principal Legal Advisor

U.S. Department of Homeland Security
425 I Street, N.W., Room 6100
Washington, DC 20536



U.S. Immigration
and Customs
Enforcement

June 2, 2004

[REDACTED]
Chief Claims Investigator
Foreign Torts Branch
United States Army Claims Service
Office of the Judge Advocate General
4411 Llewellyn Avenue
Fort George G. Meade, Maryland 20755-5360

Dear [REDACTED]

In reply to your request that this office determine the immigration status of the two claimants, [REDACTED], we have done a preliminary computer search. Our records show that [REDACTED] is a Swedish citizen, arrived on March 19, 2004, with visitor status that will expire on June 18, 2004. He has no "green card" or immigration file other than the record of his entry as a visitor. Since he is a Swedish citizen he is allowed to visit without a visa pursuant to the Visa Waiver Program, which allows visitors from specified countries to enter this country for short periods of time without a visa.

[REDACTED] has received a Permanent Resident Card, immigration [REDACTED] as a result of his emigration from Canada. [REDACTED] can request a replacement for his Permanent Resident Card by submitting a completed form I-90. The replacement process is sometimes a long wait, however, the submission of the request form generates file-stamped paperwork that will suffice as proof of his residency for any travel he needs to accomplish in the interim.

I hope this information is helpful. Please contact me at your earliest convenience if you have any further questions.

Sincerely,

[REDACTED]

Chief [REDACTED]
Commercial and Administrative Law Division



DEPARTMENT OF THE ARMY
U.S. ARMY CLAIMS SERVICE
OFFICE OF THE JUDGE ADVOCATE GENERAL
4411 LLEWELLYN AVENUE
FORT GEORGE G. MEADE, MARYLAND 20755-5360



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 9, 2004

Foreign Torts Branch

Subject: Claim of [REDACTED]

[REDACTED] P.C.
[REDACTED] ae
Huntington Woods, MI 48070-1332

Dear Mr. [REDACTED]

This letter acknowledges receipt on June 8, 2004 of the amended claim and accompanying documents you submitted by hand related to the above-captioned claim of your client, [REDACTED] against the United States in the amount of \$82,000.00 for property loss and \$3.5 million dollars for personal injury. The claim alleges that United States military personnel in Iraq mistreated and tortured your client in Abu Ghraib prison after his arrest in Baghdad, Iraq, from September to December 2003. Your client alleges insomnia, depression, loss of memory, post traumatic stress disorder, injury to his left leg and right hand, and closed head injury.

As we discussed yesterday, I will consider this claim under the Foreign Claims Act (FCA), Title 10, United States Code, Section 2734, as [REDACTED] is a resident of Sweden and the alleged injuries took place outside of the United States.

If you have any questions, you may contact me at [REDACTED] extension [REDACTED] or by email at [REDACTED]. Please refer to your claim number in all correspondence.

Sincerely,

[REDACTED]
Lieutenant Colonel, US Army
Chief, Foreign Torts Branch



DEPARTMENT OF THE ARMY
U.S. ARMY CLAIMS SERVICE
OFFICE OF THE JUDGE ADVOCATE GENERAL
4411 LLEWELLYN AVENUE
FORT GEORGE G. MEADE, MARYLAND 20755-5360



Foreign Torts Branch

JUN 15 2004

[REDACTED]
Department of Homeland Security
Office of General Counsel
Immigration and Naturalization Service
Washington, DC

Dear [REDACTED]

I would like to take this opportunity to thank you for your prompt reply to our letter dated May 20, 2004, concerning claimants, [REDACTED] and [REDACTED].

On June 8, 2004, Lt. [REDACTED], Chief of Foreign Torts Branch at the United States Army Claims Service and I interviewed [REDACTED] at his attorney's office in Dearborn, Michigan. [REDACTED] stated that his mother [REDACTED] of Dearborn, Michigan a naturalized United States Citizen traveled to Baghdad, Iraq during the period September thru December 2003, to talk to the General's once she found out that he was incarcerated. It is possible that she first went to Syria and traveled overland to Baghdad.

Could you please check your computer to determine if his statement is true or not. If you have any questions, you can reach me at [REDACTED] extension [REDACTED] or [REDACTED] extension [REDACTED].

Sincerely,

[REDACTED]
Chief Claims Investigator
Foreign Torts Branch

[REDACTED]
ATTORNEYS AND COUNSELORS
26611 WOODWARD AVENUE
[REDACTED]

[REDACTED] ED
[REDACTED] ASSEL
[REDACTED]

FAX: [REDACTED]
e-mail: [REDACTED]

August 6, 2004

[REDACTED]
Chief Foreign Torts Branch
Department of the U.S. Army
U.S. Army Claims Service
Office of the Judge Advocate General
4411 Llewellyn Avenue
Fort George G. Mead, MD 20755-5360

RE: Claim [REDACTED]
04-C01-T065

Dear Lieutenant [REDACTED]

This is a follow up pertaining to [REDACTED] claim. As you know, it has been three months since we filed the claim. My client is in desperate need of the funds that were taken away from him. Could we agree that the \$79,000 be returned to my client while the remaining claim is being considered?

Your prompt attention to this matter would be greatly appreciated. Thank you.

Very truly yours,
[REDACTED]
[REDACTED]

SHA/le

[REDACTED]
ATTORNEYS AND COUNSELORS
26611 WOODWARD AVENUE
[REDACTED]

[REDACTED]
FAX: ([REDACTED])
e-mail: [REDACTED]

August 6, 2004

[REDACTED]
Chief Foreign Torts Branch
Department of the U.S. Army
U.S. Army Claims Service
Office of the Judge Advocate General
4411 Llewellyn Avenue
Fort George G. Mead, MD 20755-5360

RE: Claim [REDACTED] eh
04-C01-T065

Dear Lieutenant [REDACTED]

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Your prompt attention to this matter would be greatly appreciated. Thank you.

Very truly yours,
[REDACTED]
[REDACTED]

SHA/le

**CLAIM FOR DAMAGE,
INJURY, OR DEATH**

INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.

FORM APPROVED
OMB NO.
1105-0008

1. Submit To Appropriate Federal Agency:
U.S. Army Claims Service
Office of Judge Advocate General
4411 Llewellyn Avenue
Fort Meade, MD 20755-5360

2. Name, Address of claimant and claimant's personal representative, if any. (See instructions on reverse.) (Number, street, city, State and Zip Code)
[REDACTED] .C.
[REDACTED]

3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input type="checkbox"/> CIVILIAN	4. DATE OF BIRTH 01/07/1962	5. MARITAL STATUS Married	6. DATE AND DAY OF ACCIDENT 09/25/2003 to aprox. 12/23/03	7. TIME (A.M. OR P.M.)
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8. Basis of Claim (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof) (Use additional pages if necessary.)

Please see enclosed letter.

9. PROPERTY DAMAGE

NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, street, city, State, and Zip Code)

BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF DAMAGE AND THE LOCATION WHERE PROPERTY MAY BE INSPECTED. (See instructions on reverse side.) Please see enclosed letter.
Note: There was no property damage. Simply, \$79,000 in addition to a vehicle value at \$3,000 remain in possession with the army.

10. PERSONAL INJURY/WRONGFUL DEATH

STATE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE NAME OF INJURED PERSON OR DECEDENT.

Please see enclosed letter.

11. WITNESSES

NAME	ADDRESS (Number, street, city, State, and Zip Code)
[REDACTED]	[REDACTED] .C.

Names of other witnesses will be furnished.

12. (See instructions on reverse) AMOUNT OF CLAIM (in dollars)

12a. PROPERTY DAMAGE Money \$79,000 Vehicle \$3,000	12b. PERSONAL INJURY \$3,500,000	12c. WRONGFUL DEATH	12d. TOTAL (Failure to specify may cause forfeiture of your rights.)
---	-------------------------------------	---------------------	--

I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE ACCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM

13a. SIGNATURE OF CLAIMANT (See instructions on reverse side.) [REDACTED]	13b. Phone number of signatory (248)591-5000	14. DATE OF CLAIM 05/12/2004
--	---	---------------------------------

CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM
The claimant shall forfeit and pay to the United States the sum of \$2,000, plus double the amount of damages sustained by the United States. (See 31 U.S.C. 3729.)

CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS
Fines of not more than \$10,000 or imprisonment for not more than 5 years or both. (See 18 U.S.C. 287, 1001.)

Previous editions not usable.

Received
8 Jun 04
[REDACTED]

STANDARD FORM 95 (Rev. 7-85)
PRESCRIBED BY DEPT. OF JUSTICE
28 CFR 14.2
USAPPC V1.00