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18 UNITED STATES DISTRICT COURT
19 FOR THE EASTERN DISTRICT OF WASHINGTON

20 SULEIMAN ABDULLAH SALIM,
21 MOHAMED AHMED BEN SOUD, OBAID
22 ULLAH (AS PERSONAL
23 REPRESENTATIVE OF GUL RAHMAN),

24 Plaintiffs,

25 v.

26 JAMES ELMER MITCHELL and JOHN
"BRUCE" JESSEN

Defendants.

2:15-CV-286-JLQ

DECLARATION
OF MOHAMED
AHMED BEN
SOUD

1 I, **MOHAMED AHMED BEN SOUD**, make this declaration
2 pursuant to 28 U.S. Code § 1746:
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4 1. My name is Mohamed Ahmed Ben Soud, and I am one of the
5 Plaintiffs in this matter. Over the years I have also been known as Abdul
6 Karim/Abd al-Karim and Muhammad Ahmad al-Sharu'iya.
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8 2. I am over 18 years of age, have personal knowledge of all the facts
9 contained in this Declaration, and am competent to testify as a witness to these
10 facts.
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12 3. From April 2003 to April 2004, I was detained at a CIA-run
13 facility, known as COBALT.
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15 4. I make this declaration based on my personal experience of my
16 detention and interrogation at COBALT, and my abusive treatment there.
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18 5. CIA interrogators used excruciating and humiliating interrogation
19 methods on me repeatedly and in combination over a five or six week period,
20 beginning about two weeks after my initial detention.
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22 6. Beyond interrogation methods, CIA interrogators subjected me to
23 other forms of abusive treatment during my year-long detention at COBALT,
24 including methods of extreme sensory deprivation. I was held in solitary
25 confinement, chained and shackled in a small, windowless, filthy cell. For the
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1 first five months, my cell was kept pitch-black. The first time I saw sunlight
2 was September 2003, when interrogators took me outside for the first time. For
3 the entire year, western music blared continuously at deafening levels, inside
4 and outside my cell. I felt completely isolated and had little or no sense of time.
5 I did not know whether it was day or night. A nauseating stench pervaded the
6 entire building. The smell was particularly intense in my cell because I wasn't
7 provided with toilet facilities, other than an uncovered metal bucket. I wasn't
8 permitted to wash for five months, nor cut my hair, beard, or nails. I was
9 deprived of adequate food and water. I was almost starved in the first few
10 months, losing about 60 pounds in weight. These debilitating conditions caused
11 me to suffer severe mental anguish and distress. They have also permanently
12 affected my hearing and sense of taste and smell.

17 7. In my cell, guards chained me by my arms and legs to a rusty hoop
18 that was attached to the wall so that I was in one of three different painful
19 positions. These stressful positions caused me acute pain in my lower and upper
20 back and knees, and exacerbated the already-excruciating pain in my left foot,
21 which had been broken when I was captured in Pakistan the previous month.
22 Together with the putrid smell and deafening music, the pain from the positions
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1 I was put in also made it impossible for me to sleep, leaving me continually
2 physically and mentally exhausted.
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4 8. Guards also used two other methods to deprive me of sleep. When
5 I was unable to stand because of my broken foot, they would bang loudly on the
6 door of my cell every hour to keep me awake. Additionally, once medics
7 removed the cast from my leg, guards would enter my cell, unchain me, and
8 then forcibly march me around the prison naked every half-hour through the
9 night into the morning. This was an extremely humiliating and degrading
10 experience. It was also horribly painful, especially in my foot, which had only
11 recently healed. The constant lack of sleep also caused me profound mental
12 anguish. It drove me close to madness.
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16 9. CIA interrogators questioned me during the first two weeks of my
17 detention. They asked me the same questions repeatedly, and I gave them the
18 same truthful answers in response. In between their questions, interrogators
19 grabbed me by my shoulders and pulled and pushed me back and forth, and
20 slapped me forcefully in the face, and stomach.
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23 10. About two weeks after my initial detention, interrogators increased
24 the severity of my interrogation by introducing a number of especially
25 excruciating and humiliating methods. Two teams of interrogators applied these
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1 new methods – some of them repeatedly and in combination - in two distinct
2 phases. The first phase lasted some two or three weeks and the second another
3 two or three weeks. Around the end of May 2003, interrogators stopped using
4 some of these methods, but continued to question me and subject me to
5 humiliating and degrading conditions of confinement, including by various
6 methods of sensory deprivation.
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9 11. Until about the end of May 2003, I was kept naked or in diapers.
10 Interrogators provided me with clothing for the first time after they stopped the
11 worst of my treatment; a light pair of trousers and a t-shirt, but both were cut-up
12 oddly, missing a leg or a sleeve. I'm a devout Muslim and, based upon my faith,
13 found the forced nudity especially humiliating and degrading. It also left me
14 feeling extremely vulnerable and helpless.
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17 12. On the first day of the first phase of interrogation, guards took me
18 from my cell to a room in which a wooden wall had been constructed. One of
19 my interrogators placed a foam collar around my neck and then slapped me
20 forcefully, first in the face and then in the stomach. He then threw me repeatedly
21 and violently against a wooden wall. The noise made when my body slammed
22 into the wall was deafening and terrifying. Interrogators repeated this same
23 process for about 20 or 30 minutes before taking me for interrogation in another
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1 room, and then back again for another session. Interrogators continued these
2 violent sessions on a daily basis for many hours. As the sessions continued, they
3 became increasingly painful. I developed a severe headache and dizziness
4 immediately after a session ended, which lasted for hours thereafter. During the
5 second phase, the second team of interrogators applied the same violent methods
6 but with even increased ferocity. This resulted in even more acute pain in my
7 body, headaches and dizziness.
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10 13. After about a week of daily sessions of the wall method described
11 above, interrogators added another method involving water. Guards forced me,
12 naked, into the center of a large plastic sheet. With my hands cuffed at the
13 wrists, they forced my arms over my head. Four men pulled up the four corners
14 of the plastic sheet to form a shallow basin. They then threw buckets of ice-cold
15 water over my face and body until I was partially submerged and struggling to
16 breathe. The water seemed to have been treated with some substance and clung
17 to my body, like a gel. It was so cold as to be painful. I shivered violently. A
18 person whom I took to be a doctor monitored the proceedings, periodically
19 checking my vital signs. When the doctor decided that my temperature was
20 dangerously low, he would give instructions for warm water to be thrown over
21 me until my temperature raised slightly. Each session lasted about half an hour
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1 to forty minutes, sometimes longer. After each session, the interrogators took
2 me, naked and shivering, to another room to interrogate me. After about two
3 weeks, interrogators increased the intensity of the water method by placing a
4 hood over my head before pouring the ice-water over me. The addition of the
5 hood caused me to choke and suffocate as the water soaked into it. In addition
6 to feeling completely disoriented, I felt like I was drowning. Interrogators used
7 this water method in combination with the wall on multiple times a day for
8 about four or five weeks.
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12 14. During the second, most intense phase of my abuse, interrogators
13 introduced another method involving water. Interrogators strapped me to a
14 wooden board that could spin around 360 degrees. They then spun me around
15 on this board with a hood over my head, which covered my nose and mouth.
16 While strapped to the board with my feet above my head, interrogators poured
17 buckets of freezing cold water over me. It ran into my mouth and up my nose,
18 causing me to choke and suffocate. I struggled for breath. I felt I was drowning.
19 Although interrogators did not pour water directly over my mouth and nose,
20 they threatened to do so if I didn't cooperate. The threat of this procedure
21 terrified me.
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1 15. During the second most intense phase, Interrogators also crammed
2 me inside a tall, thin, wooden cupboard. It was one of several such cupboards
3 that were lined up. Once I was inside, interrogators chained my hands above my
4 head to the top of the cupboard. I could see speakers located at ear level on
5 either side of the cupboard. After forcing the door shut, interrogators turned the
6 speakers on at a deafening volume. The noise was unbearable. Interrogators left
7 me inside with the music blaring for hours. They eventually stopped the music
8 and released me. My ears ached and I had a severe headache for many hours
9 after. Standing for those long hours with my arms chained above my head also
10 caused severe pain in my legs, my left one in particular, my upper and lower
11 back and arms. Interrogators used this method only once but they threatened me
12 with it again if I didn't cooperate.

17 16. Interrogators also forced me into an even smaller wooden box,
18 measuring approximately 3 ft. by 3 ft. The box had a series of small holes on
19 each side. Once squeezed inside, interrogators locked the box and left me inside
20 for some forty-five minutes. Like the larger box method, this experience was
21 both physically and mentally excruciating. I suffered acute lower back pain
22 when I was squeezed inside, as well as severe pain in my legs, the left one
23 especially, my knees, neck and elbows. The thought of being forced inside the
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1 box again filled me with dread. I was subjected to this method only once or
2 twice, but interrogators threatened me with its use on numerous other occasions.
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4 17. Also during the second most intense phase, interrogators subjected
5 me to another form of sleep deprivation using an extremely painful, prolonged
6 standing position to keep me awake. For one and a half days, interrogators hung
7 me by the arms from a metal rod that ran the width of a small cell. I was naked
8 and positioned with my arms over my head and so that the balls of my feet—
9 including the ball of my broken left foot—were barely able to touch the ground.
10 If I loosened my arms, they felt like they would come out of their sockets. It
11 was impossible for me to fall asleep. The room was small and pitch-black
12 except for a tiny blinking red light level with my head. Loud rock music was
13 blasted directly into the room for the duration of my suspension from the ceiling.
14 After a very short time, alone in that room and unable to sleep, I began to
15 hallucinate and slowly became hysterical. After a day and a half, the guards
16 released me. I wasn't able to walk and they had to carry me to an examination
17 room for treatment. My legs had become engorged and swollen with fluid, my
18 left leg especially. I had excruciating pain in both limbs as well as in my arms
19 and my upper and lower back. This pain lasted for many days after the
20 examination, and it remains with me to this day.
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1 18. Interrogators interspersed violent and terrifying sessions as
2 described above with interrogation sessions, when interrogators would ask me
3 the same questions over and over again. During these sessions, interrogators
4 would beat me repeatedly using a combination of methods involving forcefully
5 grabbing and shoving me, violently shaking me, and painfully striking my face
6 and stomach. These beatings caused me acute pain in my jaw, face and stomach,
7 which lasted for many hours after.
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10 19. These various methods, applied in addition to the harsh conditions
11 of my prolonged confinement, made me feel completely hopeless and helpless.
12 They instilled in me a constant state of terror, apprehension, and dread. These
13 feelings started to lessen only once interrogators stopped using some of the
14 worst of their interrogation methods, around the end of May 2003. However, to
15 this day, I continue to suffer severe physical pain and mental distress from my
16 time at COBALT.
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20 20. I do not know why the CIA detained and interrogated me. I have
21 never been involved in terrorism. I have never been a member of Al Qaeda, nor
22 associated with that organization. I opposed and fought against the Gaddafi
23 dictatorship, but I have never taken up arms against the United States.
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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.
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4 Executed on May 22, 2017

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9 **Mohamed Ahmed Ben Soud**