

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

- - -

SULEIMAN ABDULLAH :
SALIM, MOHOMED AHMED : DOCKET NO.
BEN SOUD, OBAID ULLAH :
(as personal : 2:15-CV-286-JLQ
representative of GUL :
RAHMAN), :

Plaintiffs, :

v. :

JAMES ELMER MITCHELL :
and JOHN "BRUCE" :
JESSEN, :

Defendants. :

- - -

Friday, January 20, 2017

- - -

Videotaped deposition of JOHN
BRUCE JESSEN, taken pursuant to notice,
was held at the law offices of Blank
Rome, 130 N. 18th Street, Philadelphia,
Pennsylvania 19103, beginning at 10:07
AM, on the above date, before Constance
S. Kent, a Registered Professional
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

* * *

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1	NO.	DESCRIPTION	NO.
2	Exhibit 23	Email dated 5/28/03, Bates USA 1588	248
3	Exhibit 35	Email, Subject: EIT	260
4		briefing for Sec State, labeled US Bates 1175	
5	Exhibit 21	CIA Comments on the	274
6		Senate Select Committee on Intelligence Report on the Rendition, Detention and Interrogation Program	
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1 THE VIDEOGRAPHER: We are
2 now on the record.
3 This begins DVD No. 1 in the
4 deposition of John Bruce Jessen in
5 the matter of Salim versus James
6 Elmer Mitchell and John Bruce
7 Jessen in the United States
8 District Court, Eastern District
9 of Washington.
10 Today is January 20th, 2017,
11 and the time is 10:07 AM.
12 This deposition is being
13 taken at 130 North 18th Street,
14 Philadelphia, Pennsylvania, at the
15 request of Gibbons, PC.
16 The videographer is Benjamin
17 Neate of Magna Legal Services, and
18 the court reporter is Connie Kent
19 of Magna Legal Services.
20 All counsel and parties
21 present will be noted on the
22 stenographic record.
23 Will the court reporter
24 please swear in the witness.

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1	- - -
2	DEPOSITION SUPPORT INDEX
3	- - -
4	
5	Direction to Witness Not to Answer
6	Page Line Page Line Page Line
7	None
8	
9	
10	Request for Production of Documents
11	Page Line Page Line Page Line
12	None
13	
14	
15	Stipulations
16	Page Line Page Line Page Line
17	None
18	
19	
20	Question Marked
21	Page Line Page Line Page Line
22	None
23	
24	

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1 JOHN BRUCE JESSEN, having
2 been first duly sworn, was
3 examined and testified as follows:
4 MR. WARDEN: Good morning,
5 I'm Andrew Warden from the US
6 Department of Justice and I
7 represent the United States
8 Government.
9 On behalf of the United
10 States Government, I have with me
11 here today Joseph Sweeney,
12 attorney with the CIA Office of
13 General Counsel, Cody Smith, an
14 attorney with the CIA Office of
15 General Counsel, Heather Walcott,
16 an attorney with the CIA Office of
17 General Counsel, Megan Beckman,
18 paralegal with the CIA Office of
19 the General Counsel, Antoinette
20 Shiner, Information Review Officer
21 with the CIA.
22 And on behalf of the
23 Department of Defense, Richard
24 Hatch, an attorney with the DOD,

1 these -- if these words don't make sense
 2 to you or seem inaccurate.
 3 A. We're on --
 4 Q. But on -- but on the very
 5 bottom of the page where we were on,
 6 which was 1051?
 7 A. The bottom of 1051, okay.
 8 Q. It says:
 9 "People can go hundreds of
 10 hours with sleep deprivation and not have
 11 ill effects."
 12 Do you believe that to be
 13 true?
 14 A. I -- you know, I'm not up on
 15 the literature right now. I know you can
 16 go a long, long time without -- and you
 17 bounce back, but I don't know the answer
 18 to that.
 19 Q. Do you know how Gul Rahman
 20 was deprived of sleep?
 21 A. No, I don't. You mean how
 22 they orchestrated it so he couldn't
 23 sleep? I don't know the answer to that.
 24 Q. Do you have a sense of how

1 sleep deprivation was accomplished with
 2 detainees?
 3 A. I know how sleep deprivation
 4 was accomplished on some detainees.
 5 Q. Did you know how it was
 6 accomplished on detainees at Cobalt?
 7 A. I do not.
 8 Q. Do you know how it was
 9 accomplished with Nashiri?
 10 A. I don't remember sleep
 11 deprivation being used with Nashiri, but
 12 I was only with him for a few days.
 13 Q. Why don't -- why don't we
 14 ask this in a different way: What
 15 methods have you seen for inducing sleep
 16 deprivation?
 17 A. I don't know if I'm allowed
 18 to tell you.
 19 MR. LAVIN: Is that -- we
 20 can take a moment.
 21 MR. WARDEN: Why don't we
 22 confer on that?
 23 MR. LAVIN: Sure.
 24 THE VIDEOGRAPHER: The time

1 is 4:10 PM. We are now off the
 2 video record.
 3 (Recess.)
 4 THE VIDEOGRAPHER: We are
 5 now back on the video record. The
 6 time is 4:22 PM.
 7 MR. LAVIN: Could you read
 8 back the last question, please?
 9 (Pertinent portion of the
 10 record is read.)
 11 THE WITNESS: I've seen one.
 12 The one that was authorized where
 13 I was working. I don't know what
 14 other people working for the
 15 agency interrogating people in
 16 other places did. I don't know
 17 what was done to Zubaydah before I
 18 got there, but this is how it was
 19 done.
 20 There is a tether anchored
 21 to the ceiling in the center of
 22 the detention cell. The detainee
 23 has handcuffs and they're attached
 24 to the tether in a way that they

1 can't lie down or rest against a
 2 wall.
 3 They're monitored to make
 4 sure they don't get edema if they
 5 hang on the cuffs too much. Well,
 6 they're monitored 24/7 anyway but
 7 it's -- after an hour or two, it's
 8 uncomfortable and you can't sleep,
 9 and that's the only method that I
 10 have observed used.
 11 BY MR. LAVIN:
 12 Q. Have you ever heard the
 13 phrase "to stand the detainee up"?
 14 A. No.
 15 Q. Before these interrogations
 16 of Gul Rahman that we're discussing, how
 17 many different detainees had you
 18 interrogated?
 19 A. Zubaydah, and I had
 20 questioned and assessed this Belushi (ph)
 21 smuggler that they had sent me to Cobalt
 22 to see. They were thinking about using
 23 him in a specific way and they wanted me
 24 to talk to him.

CERTIFICATE

I HEREBY CERTIFY that the witness was duly sworn by me and that the deposition is a true record of the testimony given by the witness.

It was requested before completion of the deposition that the witness, JOHN BRUCE JESSEN, have the opportunity to read and sign the deposition transcript.

Constance S. Kent



Constance S. Kent, CCR, RPR, CLR
Certified Court Reporter
Registered Professional Reporter
Certified LiveNote Reporter
and Notary Public in and for the
Commonwealth of Pennsylvania
Dated: January 23, 2017

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

ERRATA

PAGE LINE CHANGE

Table with 3 columns: Page, Line, Change. Rows 1-24.

ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby certify that I have read the foregoing pages, 1 - 294, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

JOHN BRUCE JESSEN DATE

Subscribed and sworn to before me this ____ day of _____, 20____. My commission expires: _____

Notary Public