

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

- - - - - x

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 I

January 31, 2017

Reported by:

Jane M. Borrowman, RPR, CSR

Job no: 17957

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1 Dominica?
2 A. I entered on the day 25th January.
3 Q. What name did you use when you entered this
4 country, sir?
5 A. The official name -- my official name, Mohamed
6 Ahmed Ben Soud.
7 Q. Mr. Soud, how did you come to be known as
8 Abdul (sic) Kareem?
9 A. I did not understand the question.
10 Q. Did there come a time when you started using
11 the name Abdul Kareem?
12 A. Yes.
13 Q. When?
14 A. At different times.
15 Q. When did he first start using the name?
16 A. In 1995.
17 Q. And why did he start using that name in 1995?
18 A. I used these names, and Abdel Kareem is one of
19 them, to secure myself and to secure my
20 movement through or during my affiliation with
21 LFG (sic) and in fear of the chase of the
22 dictatorial Gaddafi regime for me.
23 MS. SHAMSI: Jim, just one more
24 thing, I think the words were "LIFG," or the

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1 letters were "LIFG."
2 MR. SMITH: Did you get the whole
3 answer?
4 INTERPRETER: Yes.
5 MR. SMITH: Do we agree with LIFG?
6 INTERPRETER: Yes.
7 MR. SMITH: Okay. Thank you.
8 BY MR. SMITH:
9 Q. How did you get that name?
10 A. Personal choice.
11 Q. And did you have identification that actually
12 identified you by the name Abdul Kareem?
13 A. No.
14 Q. Do you have any official identification for
15 the person that you identified yourself on the
16 record as?
17 MS. SHAMSI: Objection. You may --
18 THE WITNESS: Yes.
19 MS. SHAMSI: -- answer.
20 I just want it to be clear that I
21 objected.
22 MR. SMITH: Do you speak Arabic?
23 MS. SHAMSI: No, I don't. I was
24 just -- it was just a formal objection.

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1 And I'll just say that I objected
2 and so there should be time for me to object
3 just as a -- but you may still answer.
4 BY MR. SMITH:
5 Q. Mr. Soud, when did you start using the name
6 Mohamed Ahmed Al-Zabandar?
7 A. I used it in 2000.
8 Q. And why did you start using that name in 2000?
9 A. I used it to secure myself.
10 Q. And why was it necessary -- strike that.
11 Was this a false name?
12 A. Yes.
13 Q. And why was it necessary to use a false name
14 in 2000 to secure yourself?
15 A. We, I, through my affiliation with LIFG and my
16 opposition to the unjust regime of Gaddafi in
17 Libya, I had to do so to secure myself from
18 them -- from that regime following me.
19 That, for me, meant a matter of life
20 or death. That meant a matter of freedom or
21 to be kept in an unjust regime of Gaddafi's
22 prisons, that there is no human rights
23 connected with it, related to it or in it.
24 Q. Mr. Soud, who was following you in 2000?

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1 A. The unjust dictatorial regime of Gaddafi.
2 Q. And why was Gaddafi following you in 2000, his
3 regime?
4 A. Through my affiliation with LIFG.
5 Q. What about your affiliation with LIFG caused
6 Gaddafi's regime to follow you?
7 A. It's a group that opposes the unjust regime of
8 Gaddafi and resisting the Gaddafi regime and
9 against injustice after the Gaddafi regime
10 confiscated freedoms and ruptured human
11 rights, kidnapping and torture, and trials
12 outside of the law frame, that was the reason
13 for setting up the LIFG and was a reason for
14 me to be affiliated with the LIFG, to
15 overthrow this unjust regime.
16 Q. Mr. Soud, when did you start using the name
17 Mohamed Ahmed Al-Shareaia?
18 A. This name, Al-Shareaia, I used since my --
19 since I was young, and that was the name that
20 my family had. My family was named
21 Al-Shareaia. And for family reasons that
22 could -- that I can explain, I changed that
23 name through the Libyan courts and -- already,
24 and a judgment was issued in that regard.

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1 Q. Do you still use that name, sir?
 2 MS. SHAMSI: Objection.
 3 THE WITNESS: I did not use this
 4 name because the court abolished that family
 5 name and so I used -- started to use the name
 6 Ben Soud instead of Al-Shareaia.
 7 BY MR. SMITH:
 8 Q. And when did you start using the name Ben
 9 Soud?
 10 A. In the year 2013.
 11 MS. SHAMSI: Jim, when you get to a
 12 point where it makes sense, I'd like to just
 13 take a quick break just to talk about some
 14 translation and transcription --
 15 MR. SMITH: Sure.
 16 MS. SHAMSI: -- issues that I think
 17 are arising.
 18 MR. SMITH: Okay. So how about
 19 right now?
 20 MS. SHAMSI: Sure.
 21 MR. SMITH: Since we're here all day
 22 and night.
 23 VIDEOGRAPHER: The time is 10:21.
 24 We're off the record.

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1 (Discussion held off the record.)
 2 VIDEOGRAPHER: We're back on the
 3 record. The time is 10:36 -- or 26. Sorry.
 4 MS. SHAMSI: So I just wanted to
 5 make clear that my concern was that what was
 6 being interpreted was not Mr. Ben Soud's exact
 7 words and, therefore, what was being
 8 transcribed was not his exact words as opposed
 9 to the interpreter getting to his exact words.
 10 And so we have our interpreter sitting here
 11 trying to make sure that it's his exact words
 12 that are transcribed.
 13 MR. SMITH: Sure. And just so we're
 14 clear on the record, your interpreter, in
 15 addition to ours, has been here since the
 16 start of the deposition. And I've invited
 17 your interpreter at any time, if he thinks
 18 there's an issue about the correctness of the
 19 interpretation, to speak up, and let's make
 20 sure we get it down right in the record.
 21 MS. SHAMSI: That's absolutely --
 22 MR. SMITH: And just so we're clear,
 23 Bashar, you haven't spoken up, so I'm assuming
 24 there haven't been any issues.

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1 MR. ALHALABI: No.
 2 MR. SMITH: Okay. No, there have
 3 been no issues?
 4 MR. ALHALABI: There have been no
 5 issues.
 6 MR. SMITH: Okay.
 7 MS. SHAMSI: And I appreciate that,
 8 Jim, but what Bashar was not able to see was
 9 the transcription and wouldn't know whether
 10 there are issues because there's a difference
 11 between what's being said and what's being
 12 written and that was the concern I was trying
 13 to address.
 14 MR. SMITH: Okay. So the issue now,
 15 so I understand it, is not the interpreter's
 16 interpretation of what Mr. Soud is saying, but
 17 the court reporter's placement in the record
 18 of what the interpreter is saying, is that
 19 correct?
 20 MS. SHAMSI: Yes.
 21 MR. SMITH: Okay.
 22 MS. SHAMSI: Because it seemed
 23 like --
 24 MR. SMITH: Hundred percent. Okay.

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1 So to accommodate that concern, I've asked the
 2 court -- your court reporter (sic), who was
 3 sitting next to me and the witness, to move
 4 over and actually look at the -- at the laptop
 5 as the testimony is being transcribed by the
 6 court reporter. So, hopefully, that will
 7 address everything.
 8 MS. SHAMSI: Our interpreter. And,
 9 yes, we appreciate that.
 10 MR. SMITH: Okay. So is it time to
 11 break for lunch?
 12 BY MR. SMITH:
 13 Q. Okay. So let me go back to the name Rbuie.
 14 When did you start using that name, Mr. Soud?
 15 A. I started using it while I was in Afghanistan
 16 in 1991.
 17 Q. And why were you in Afghanistan in 1991?
 18 A. I was, in the year 1991, in Afghanistan
 19 because I joined the LIFG and I was working
 20 towards the resistance of the Russian
 21 occupation to Afghanistan.
 22 Q. And who -- who were you assisting in
 23 connection with that resistance?
 24 A. I was helping the Afghani resistance.

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1 Q. Who from the Afghanis?
 2 A. The Afghani resistance, in general, who was --
 3 in general or generally, who was resisting the
 4 occupation.
 5 Q. Was there a particular group or groups of
 6 Afghanis who were resisting and were they
 7 known by any names?
 8 MS. SHAMSI: Objection. You may
 9 answer.
 10 THE WITNESS: Groups like the group
 11 of Professor Burhan Adeen Ratani (sic).
 12 MR. SMITH: Could you spell that,
 13 please?
 14 Oh, did I interrupt your answer? I
 15 apologize. Let me -- why don't you finish
 16 your answer and, then, if you could spell the
 17 names.
 18 And could I just ask, on a
 19 go-forward basis, any time there's a name,
 20 just so we have the record correct, if you
 21 could spell it, that would help.
 22 INTERPRETER: Sure.
 23 MR. SMITH: Thank you.
 24 Sorry I interrupted.

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1 INTERPRETER: Burhan, B-U-R-H-A-N,
 2 A-L-D-E-E-N, G-E-E-D-A-N-I (sic). And the
 3 group of Abdel Rassul Essyef, A-B-D-E-L,
 4 R-A-S-S-U-L, A-S-S-E-E-F -- sorry, E-Y --
 5 S-S-Y-E-F (sic). And the group of Sheikh Dr.
 6 Mohamed Nabi, M-O-H-A-E-D (sic), N-A-B-I. And
 7 the group of -- the group of Al-Sheikh
 8 Ajeelani, A-J-E-E-L-A-N-I, all these groups
 9 were resisting the Russian occupation.
 10 MR. ALHALABI: I'm sorry. Excuse
 11 me. Professor Burhanuddin Rabbani.
 12 INTERPRETER: Rabbani.
 13 THE WITNESS: Rabbani.
 14 INTERPRETER: Rabbani.
 15 MR. ALHALABI: I'm not sure that's
 16 what was said or spelled.
 17 INTERPRETER: I said Rabbani.
 18 MR. ALHALABI: Yeah. Okay.
 19 INTERPRETER: Correction for the
 20 record, the group of Burhan Adeen (sic)
 21 Rabbani. Rabbani is R-A-B-B-A-N-I.
 22 MR. ALHALABI: And, also, one more
 23 thing on the record, that said "shake," but
 24 it's "sheikh."

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1 COURT REPORTER: I'll make the
 2 correction when we're finished.
 3 MR. ALHALABI: Okay.
 4 COURT REPORTER: I'll go through
 5 this word for word.
 6 MR. ALHALABI: No problem.
 7 BY MR. SMITH:
 8 Q. Why did you elect to use -- strike that.
 9 The name Rbuie was a false name?
 10 A. Yes.
 11 Q. And why was it necessary in 1991 to use a
 12 false name while you were in Afghanistan?
 13 A. Yes, we were using the same false names the
 14 same way, to secure ourselves from the
 15 following up of the Gaddafi regime. This
 16 chase happened everywhere, in the Sudan, in
 17 Turkey, in Afghanistan -- in Afghanistan,
 18 Sudan, Turkey and everywhere.
 19 Q. So, Mr. Soud, the name that you go by today
 20 became your official name in 2013?
 21 A. Yes.
 22 Q. In 2002, you were captured by Pakistani
 23 forces, is that correct?
 24 A. In 2003.

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1 Q. I may have my year mixed up. Okay. So you
 2 were captured in 2003?
 3 A. Yes.
 4 Q. And at that time, did you have identification
 5 on you?
 6 A. No.
 7 Q. Were you asked by the Pakistani forces to
 8 identify yourself?
 9 A. Yes.
 10 Q. And what name did you tell them was your name?
 11 A. Mohamed Ahmed Al-Shareaia.
 12 Q. And was that your real name at the time?
 13 A. Yes.
 14 Q. And you said that that name was abolished by a
 15 court.
 16 A. That name.
 17 Q. Yes, has been abolished.
 18 A. Yes. It was abolished by a decree or a
 19 judgment from the court.
 20 Q. Okay. Which court?
 21 A. The criminal -- or the Circuit Court of
 22 Misrata for criminal -- for the criminal
 23 justice in Libya, Misrata, Libya.
 24 Q. And why was the name abolished by the court?

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1 A. Yes. Let me explain to you. My family was
 2 known by the name Al-Shareaia and the tribe
 3 that we belonged to is Ben Soud. So my uncles
 4 and all my cousins are carrying that name, Ben
 5 Soud. This difference, this name and the
 6 difference, has caused me problems between
 7 myself, my uncles and my cousins.
 8 As a result of these problems,
 9 because of these problems, I filed litigation
 10 to change my name, to change my surname. I
 11 produced the court with old documents and
 12 these documents got the satisfaction of the
 13 court, that led the court to change the name
 14 from Al-Shareaia to Ben Soud.
 15 MR. ALHALABI: Excuse me. And it's
 16 "old" documents, not "all" documents.
 17 BY MR. SMITH:
 18 Q. Mr. Soud, when were you born?
 19 A. I was born on the 22nd of the third month in
 20 1969.
 21 Q. So you're 47 years old?
 22 A. Yes.
 23 Q. And where were you born, sir?
 24 A. In the city of Misrata, M-U-S-S-A-R-A-T-A

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1 (sic), in Libya.
 2 Q. And can you tell me, briefly, about your
 3 educational background.
 4 A. I was born in Misrata, in a rural area, and
 5 had a simple upbringing. My father was the
 6 imam, I-M-A-M, for one of the mosques of the
 7 village, in a mosque in the village, and I
 8 studied at the elementary school in that
 9 village.
 10 Q. And do you have any formal education past
 11 elementary school?
 12 A. I had my middle education in a nearby village,
 13 as well, a secondary education, till I reached
 14 the university stage in another city called
 15 Sabha. S-A-B-A-H-A -- S-A-B-H-A.
 16 Q. And did you get a degree from the university?
 17 A. No.
 18 Q. How many years did you attend the university?
 19 A. Two years.
 20 Q. And what was the name of the university?
 21 A. Sabha University, the faculty of science, or
 22 the school of science.
 23 Q. Could you spell the name of the university,
 24 please?

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1 INTERPRETER: S-A-B-H-A University.
 2 Q. And what were you trying to get a degree in?
 3 A. In the faculty of science.
 4 Q. Was that chemistry, biology?
 5 A. Chemistry, the section of chemistry.
 6 Q. And what -- during what two years did you
 7 attend the university, sir?
 8 A. '89 and '90.
 9 Q. And why did you stop attending the university?
 10 A. Because of the Gaddafi regime and the
 11 oppressive apparatus of that regime who were
 12 squashing freedoms and refusing to -- refusing
 13 any opposition to that regime. I was not with
 14 the Gaddafi regime and I had been living
 15 within the university that was supervised by
 16 this security apparatus, which led to cause me
 17 a lot -- cause me trouble in the university,
 18 that -- that's why I had to get out and flee
 19 in fear of the oppression of those oppressive
 20 apparatuses.
 21 Q. Were you asked to leave the university?
 22 A. No. I was not asked to leave the university,
 23 but staying there and continuing there means
 24 that, eventually, I would be -- I would be

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1 detained and put in prison.
 2 Some of my friends who stayed in the
 3 university were detained and they had to leave
 4 their studies. They were detained, they were
 5 put in prison, and after that, they were
 6 executed in a collective massacre that was
 7 called the "massacre of Abu Salim,"
 8 B-U-E-S-E-L-E-E-M (sic), in the year 1996,
 9 where 1,200 individuals were executed in just
 10 a few hours.
 11 Q. Are you finished?
 12 A. Yes.
 13 MR. ALHALABI: If I may bring
 14 something up. As to the previous question,
 15 the translation was "security apparatus." I
 16 would use "forces," instead.
 17 Agreed?
 18 INTERPRETER: Sure.
 19 MR. ALHALABI: Yeah.
 20 MR. SMITH: Is it necessary for me
 21 to object and move to strike, nonresponsive,
 22 or can we agree that all that's reserved?
 23 MS. SHAMSI: I think we can agree.
 24 I just want to make sure that the questions

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1 are being understood, and I'm not sure about
 2 that, so that's my only issue.
 3 MR. SMITH: Yeah. This process is
 4 going to take a long time, to begin with, and
 5 adding to the record. I'm just trying to
 6 streamline this.
 7 Do we have a deal? If you want me
 8 to just pipe up otherwise.
 9 MS. SHAMSI: Why don't you just pipe
 10 up.
 11 MR. SMITH: All right. I will.
 12 MS. SHAMSI: We'll do it that way.
 13 MR. SMITH: So note my objection and
 14 move to strike the nonresponsive part of the
 15 answer.
 16 And I'll continue to do that, unless
 17 you tell me not to.
 18 BY MR. SMITH:
 19 Q. When you left the university in 1990, where
 20 did you go?
 21 A. I went to Algiers.
 22 Q. And how long did you stay in Algiers?
 23 A. One month.
 24 Q. And why did you go to Algiers?

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1 A. To prepare to go to Pakistan.
 2 Q. And what did you need to do to prepare?
 3 A. To obtain a visa.
 4 Q. So you went to Algiers for the sole purpose of
 5 getting a visa to go to Pakistan?
 6 A. Yes.
 7 Q. And why did you want to go to Pakistan?
 8 A. First of all, to join the Afghani resistance
 9 to the Russian occupation.
 10 Q. And why did you want to do that?
 11 A. For my personal conviction for helping the
 12 Afghani resistance against the Russian
 13 occupation. This resistance that we
 14 contribute -- contributed to with the Afghani
 15 resistance had the support, it had the
 16 support, direct and blessed support, of the
 17 USA.
 18 Q. So did you leave Algiers for Pakistan a month
 19 later?
 20 A. Yes.
 21 Q. And how long did you stay in Pakistan?
 22 A. Few months. I moved between Pakistan and
 23 Afghanistan.
 24 Q. And for what period of time did you go between

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1 Pakistan and Afghanistan, Mr. Soud?
 2 A. In 1991 and '92.
 3 Q. Okay. And was it in 1991 that you became
 4 affiliated with the LIFG?
 5 A. It was in the year 1992.
 6 Q. 1992. Okay.
 7 And in that period of time, in 1991
 8 and 1992, what exactly were you doing in
 9 Pakistan and in Afghanistan?
 10 A. It was joining or contributing to helping the
 11 Afghani resistance.
 12 Q. And what exactly were you doing to help?
 13 A. I contributed in the war and staying at
 14 fronts.
 15 Q. What exactly was your contribution?
 16 A. Direct combatant.
 17 Q. So you were involved in actual combat?
 18 A. Yes. I joined the direct combat.
 19 Q. Okay. And were you given a gun?
 20 A. Yes.
 21 Q. What kind of gun?
 22 A. Kalashnikov.
 23 MR. SMITH: Could you spell that,
 24 please?

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1 INTERPRETER: Maybe. I don't know.
 2 MR. SMITH: Okay. All right. We'll
 3 do our best.
 4 INTERPRETER: The interpreter
 5 doesn't know.
 6 MR. SMITH: Can you help out?
 7 MR. ALHALABI: The meaning of
 8 Kalashnikov, it's an AK-47.
 9 MR. SMITH: Okay.
 10 BY MR. SMITH:
 11 Q. Is a Kalashnikov an AK-47?
 12 A. Yes.
 13 Q. Now, during this period of time, 1991 and
 14 1992, when you were in combat, did you have a
 15 job?
 16 A. No.
 17 Q. Who paid to feed you?
 18 A. Through the affiliation with the LIFG, that
 19 group had took upon itself our daily expenses.
 20 Q. Mr. Soud, I thought that you didn't join the
 21 LIFG until 1992.
 22 A. Yes.
 23 Q. Was LIFG paying for your shelter and clothing
 24 and food even before you joined?

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1 A. That is because the LIFG is a Libyan group. I
 2 was living within this group since my arrival
 3 to Pakistan and Afghanistan, but my initial --
 4 my principal affiliation was in 1992.
 5 Q. Okay. Now, in the period 1991 and 1992, were
 6 you involved in actual combat?
 7 A. Yes.
 8 Q. How many times?
 9 A. Several times.
 10 Q. Did you actually fire the AK-47?
 11 A. Firing the Kalashnikov, I do not understand.
 12 You mean --
 13 Q. Did you shoot the gun?
 14 A. -- using it?
 15 Q. Yes.
 16 A. Yes.
 17 Q. How many times?
 18 A. Several times.
 19 Q. Who did you shoot at?
 20 A. To the enemy, to the Russian occupation.
 21 Q. Did you kill anyone?
 22 A. It didn't come to my knowledge that I killed
 23 anyone.
 24 Q. Did you actually put bullets into other

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1 people's bodies?
 2 A. I don't know exactly.
 3 Q. Did they shoot back?
 4 A. Yes. There were confrontations, yes.
 5 Q. Now, in 1992, you became affiliated with the
 6 LIFG, correct?
 7 A. Yes.
 8 Q. And LIFG stands for Libyan Islamic Fighting
 9 Group, is that correct?
 10 A. Yes. The Islamic fighting group.
 11 Q. The Libyan Islamic Fighting Group?
 12 A. Yes.
 13 Q. When was that group formed?
 14 A. Initially, it was formed -- that group was
 15 formed in 1989.
 16 Q. Who formed it?
 17 A. It was set up by a person called Awad Azouwi.
 18 Awad, A-W-A-D. Azouwi, A-Z-O-U-Y or W-I.
 19 (Sic.)
 20 Q. Did you ever meet with Awad Azouwi?
 21 A. No. No. I did not meet him because he was
 22 killed previously in the Libyan prison.
 23 Q. Now, I want to move forward from 1992, the
 24 period 1992, so let's say through 2000, did

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1 you continue to be a member of the LIFG?
 2 A. Yes.
 3 Q. And did that participation with LIFG continue
 4 up until the time in 2003 when you were
 5 arrested by the Pakistani government?
 6 A. Yes.
 7 Q. Now, during the period from 1992, when you
 8 joined the LIFG, up until 2003, did you ever
 9 have a job?
 10 A. No. I did not have a job, only it was -- the
 11 job was my affiliation with this group.
 12 Q. Okay. So let's break that down, then.
 13 Between 1992 and 1995, what were you doing for
 14 the LIFG?
 15 A. I was working with the military faction or
 16 part of this group.
 17 Q. So were you continuing to be in combat?
 18 A. Yes.
 19 Q. So you, essentially, were a soldier for the
 20 LIFG?
 21 A. Yes.
 22 Q. So during that period from 1992 through 1995,
 23 as a soldier for the LIFG, what were you
 24 trying to accomplish?

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1 A. Through joining this group, and the Gaddafi
 2 regime had stopped political life and
 3 abolishing the constitution, and showing
 4 opposition as being demons, demonizing the
 5 opposition, and considering that each one who
 6 would oppose the Gaddafi regime is a traitor
 7 who deserves to be killed within these
 8 circumstances, the group decided that its goal
 9 is the -- is opposing the Gaddafi regime and
 10 making it fall down through armed opposition,
 11 thus, there was the presence of LIFG to
 12 prepare itself for this goal.
 13 Q. How did aiding the Afghanis against Russian
 14 opposition further your goals in 1992 through
 15 1995?
 16 MS. SHAMSI: Objection. You may
 17 answer.
 18 THE WITNESS: Resisting the Russian
 19 occupation, it was a personal conviction.
 20 BY MR. SMITH:
 21 Q. How did that relate, if at all, to your
 22 opposition to Gaddafi?
 23 A. I did not understand the question.
 24 Q. I'm trying to understand why -- strike that.

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1 Let me start all over again.
 2 In your mind, was there a connection
 3 between aiding the Afghanis through your
 4 participation in the LIFG and your opposition
 5 to Gaddafi?
 6 A. Through participating in -- I did not
 7 understand the last word.
 8 MR. SMITH: Could you read the
 9 question back for the interpreter and, then,
 10 we'll see if that corrects the problem.
 11 (Whereupon, the record was read by
 12 the court reporter as follows:
 13 "In your mind, was there a
 14 connection between aiding the
 15 Afghanis through your participation
 16 in the LIFG and your opposition to
 17 Gaddafi?")
 18 THE WITNESS: This period, where we
 19 participated in resisting the occupation, was
 20 to prepare and train and to adopt a military
 21 way that we were going to take to -- in order
 22 to put down the Gaddafi regime.
 23 BY MR. SMITH:
 24 Q. Now, during this period from '92 to '95, how

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1 many times were you in active combat,
 2 Mr. Soud?
 3 A. Which military resistance, the Libyan one or
 4 the Afghani one?
 5 Q. 1992 through '95 was the Afghani one, was it
 6 not?
 7 A. Yes.
 8 Q. How many times were you in active combat
 9 during that period of time?
 10 A. At the end of '92 -- at the beginning of '92
 11 to '95, I did not participate in killing
 12 anyone.
 13 Q. Why not?
 14 A. Because of the end of the Russian occupation.
 15 Q. Now, from 1995 -- strike that.
 16 During that period of time between
 17 '92 and '95, were you continuing to cross over
 18 the border between Afghanistan and Pakistan?
 19 A. Yes.
 20 Q. And why were you doing that?
 21 A. Sometimes to get a sort of -- or some medical
 22 services that were not available in
 23 Afghanistan; some other times, to get some
 24 services that is not, as well, in Afghanistan;

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1 some other times, to get Sharia trainings.
 2 Sharia, S-H --
 3 (Translation.)
 4 A. Sharia, yeah, Islamic Sharia training sessions
 5 that is for the group LIFG, and these training
 6 sessions were for the members.
 7 Q. Mr. Soud, is it your testimony that you were
 8 not in combat in 1993, not involved in combat?
 9 A. Yes.
 10 Q. Now, you sustained an injury to your right
 11 hand in 1993, is that correct?
 12 A. Yes.
 13 Q. And is that on your right hand? I think your
 14 thumb and a part of your right hand and your
 15 -- your smallest finger, you lost both of
 16 them?
 17 A. Yes.
 18 Q. And you were trying to detonate a bomb, if I
 19 understand, is that right?
 20 A. Yes.
 21 Q. And where was that bomb at the time you were
 22 trying to detonate it?
 23 A. In Afghanistan, in the region of Jalalabad.
 24 J-A-L-A-L-A-B-A-D.

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1 Q. And was that attempt by you to detonate the
 2 bomb in connection with actual combat?
 3 A. Yes.
 4 Q. And tell me what the circumstances were that
 5 caused you to be in a position where you
 6 needed to detonate a bomb.
 7 A. The bomb was there and because of the
 8 requirement of safety and security, I did
 9 that.
 10 Q. Where was the bomb?
 11 A. In Jalalabad.
 12 Q. Was it in a house, in a car, on the roadside?
 13 A. Roadside.
 14 Q. And why were you selected to detonate the
 15 bomb?
 16 A. Because I have some idea about these things or
 17 these matters.
 18 Q. What kind of bomb was it?
 19 MR. ALHALABI: I'm sorry. Before --
 20 INTERPRETER: I'm sorry, I did
 21 not --
 22 MR. SMITH: Sure.
 23 MR. ALHALABI: You keep saying
 24 "detonate the bottom."

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1 MR. SMITH: Yes.
 2 MR. ALHALABI: Do you mean disabling
 3 the bomb, because that's what she's
 4 translating.
 5 MR. SMITH: Okay. So we'll go with
 6 disabling.
 7 INTERPRETER: Detonating is
 8 disabling.
 9 MR. ALHALABI: No. Sometimes, it
 10 can mean (speaking in Arabic) --
 11 INTERPRETER: (Speaking in Arabic.)
 12 MR. ALHALABI: No. Sometimes, it
 13 can mean blowing it up.
 14 Am I right?
 15 MR. SMITH: I don't think so.
 16 MR. ALHALABI: I believe so.
 17 MR. SMITH: All right. We'll check
 18 it at the break. All right.
 19 MS. SHAMSI: It does seem like you
 20 want to clarify the difference between
 21 defusing and detonating.
 22 BY MR. SMITH:
 23 Q. Okay. So let's make sure we're all on the
 24 same page. When I -- when we use the word

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1 "detonate," which we won't use anymore, but up
 2 until now we mean defusing the bomb, disarming
 3 it.
 4 Can you explain that to the witness
 5 and see if it changes any of his answers?
 6 INTERPRETER: The interpreter would
 7 explain the differences in using (Arabic) for
 8 detonating a bomb and defusing a bomb.
 9 (Translation.)
 10 THE WITNESS: To stop it from
 11 working.
 12 BY MR. SMITH:
 13 Q. Yes.
 14 A. So.
 15 Q. Okay. We're all on the same page.
 16 A. Yes.
 17 Q. Now, have you been trained by the LIFG about
 18 bombs?
 19 A. No, that was not the way, but it was through
 20 what we have learned in the Afghani war,
 21 during the Afghani war.
 22 Q. Did you receive any training from anyone at
 23 any time about matters pertaining to bombs?
 24 A. Yes.

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1 Q. Can you explain what training you received?
 2 A. I received training from the Red Cross and I
 3 received training from the English forces in
 4 Libya.
 5 Q. Tell me about the training you received from
 6 the English forces in Libya.
 7 A. When I was participating in the war in Libya
 8 against DAASH, ISIL.
 9 Q. Sorry. Can you -- can you repeat?
 10 INTERPRETER: Spell DAASH.
 11 MR. ALHALABI: It's ISIL. She means
 12 ISIS. I'm sorry. I'm trying to clarify.
 13 DAASH is ISIS or ISIL, for clarification.
 14 INTERPRETER: DASH, D-A-S-H.
 15 D-A-A-S-H, DAASH, which is, as my colleague
 16 said, ISIL or ISIS.
 17 MR. SMITH: Have you finished your
 18 answer?
 19 INTERPRETER: Yes.
 20 MR. SMITH: Can you repeat the
 21 answer?
 22 (Whereupon, the last answer was read
 23 back as follows: "DAASH, D-A-A-S-H,
 24 DAASH, which is, as my colleague

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1 said, ISIL or ISIS.")
 2 BY MR. SMITH:
 3 Q. I want to make sure we're clear here. What
 4 training did Mr. Soud -- or, Mr. Soud, did you
 5 receive from the English forces in Libya with
 6 respect to bombs?
 7 A. Yes.
 8 Q. Can you explain to me the training you
 9 received from the English forces?
 10 A. Through the participation -- our participation
 11 against the organization DAASH. Of course,
 12 this training was using different methods when
 13 they plant bombs and mines.
 14 And after the Libyan government
 15 decided to attack the city Sirte, S-E-R-T
 16 (sic), to liberate, to liberate Sirte, sorry,
 17 to liberate Sirte, I participated personally
 18 in these troops, and because of the simple
 19 background that these forces, these attacking
 20 forces, were using against DAASH, I -- we
 21 received -- I received within these groups
 22 special training from the British forces.
 23 Q. What -- go ahead.
 24 A. This training, in essence, is about how to

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1 recognize these bombs, how to defuse them and
 2 how to rid people of their danger.
 3 Q. Can you identify the names of these English or
 4 British forces?
 5 A. It's clear for me, I don't know.
 6 MR. ALHALABI: It's not clear for
 7 me.
 8 INTERPRETER: It's not clear?
 9 MR. ALHALABI: It's not clear for
 10 me.
 11 (Translation.)
 12 THE WITNESS: But these are forces
 13 that participate with the Libyan government in
 14 its efforts attacking DAASH.
 15 BY MR. SMITH:
 16 Q. In what years did you get this training from
 17 the British government?
 18 A. 2016.
 19 Q. 2016?
 20 A. Yes.
 21 Q. So, in 1993, when you were attempting to
 22 defuse the roadside bomb that caused the
 23 injuries to your hand, had you had any
 24 training?

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1 A. Through our participation in the war, there
 2 were general information about such issues and
 3 there was no specific training pertaining to
 4 that and, for that reason, it happened that
 5 the bomb exploded in my hand.
 6 Q. Do you know who put the bomb there?
 7 A. I don't know.
 8 Q. During this period of time, in the nine --
 9 1992 through 1995, were you ever involved in
 10 constructing bombs?
 11 A. No.
 12 Q. During that period from 1992 through 1995, did
 13 you still possess an AK-47?
 14 A. Yes.
 15 Q. Did you possess any other weapons?
 16 A. No.
 17 Q. Where did you keep your AK-47?
 18 A. In the -- in the place or the camp of the
 19 LIFG.
 20 Q. And where was the camp of the LIFG?
 21 A. It was in Afghanistan, in the region of
 22 Jalalabad.
 23 Q. Were there other LIFG camps in Afghanistan in
 24 addition to the one you were in?

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1 A. No.
 2 Q. So that was the only LIFG camp in Afghanistan,
 3 at least during that time?
 4 A. Yes.
 5 Q. How many people lived at that camp?
 6 A. Twenty people.
 7 Q. Twenty. And that would be during the period
 8 from 1992 through 1995?
 9 A. Yes.
 10 Q. Was there a leader of the camp?
 11 A. Yes.
 12 Q. What was that person's name?
 13 A. The names were varied about who was to lead
 14 the camp. From the period '92 to '95, there
 15 was a person named Abu Sufian. A-B-U,
 16 S-U-F-I-A-N.
 17 Q. Now, let me go from 1995 to 2000. You
 18 continued to be a member of the LIFG?
 19 A. Yes.
 20 Q. And did you remain at the camp in Afghanistan?
 21 A. Yes.
 22 Q. And were you involved in combat during that
 23 period of time?
 24 A. No.

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1 Q. What were you doing?
 2 A. I lived at the camp and I participated in
 3 training.
 4 Q. So for five years, you were in training?
 5 A. Five years, how come?
 6 Q. 1995 to 2000, you lived at the camp, and are
 7 you saying that during those five years you
 8 were in training?
 9 A. Allow me to give you the details.
 10 Q. Please do.
 11 MR. ALHALABI: Excuse me. I didn't
 12 say anything.
 13 MR. SMITH: Oh, I thought you wanted
 14 to say something.
 15 MR. ALHALABI: No. No. Just
 16 clearing my throat. I'm sorry.
 17 MR. SMITH: You're allowed to do
 18 that.
 19 MR. ALHALABI: I'm sorry.
 20 THE WITNESS: In 1995, I left
 21 Pakistan and Afghanistan. I returned to
 22 Afghanistan in 1997 and I stayed between
 23 Pakistan and Afghanistan till 2000. I left
 24 Pakistan and Afghanistan in 2000 and I

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1 returned to Pakistan and Afghanistan at the
 2 end of 2000. I stayed there till I was
 3 captured.
 4 MR. SMITH: Okay. So --
 5 INTERPRETER: Just a correction for
 6 the record.
 7 MR. SMITH: Sure.
 8 INTERPRETER: The interpretation
 9 could bear two words, either captured or
 10 detained.
 11 MR. ALHALABI: We're good.
 12 BY MR. SMITH:
 13 Q. So let me focus, Mr. Soud, on the years 1995
 14 to 1997. You said that you left Pakistan and
 15 Afghanistan, to go where?
 16 A. I left to the Sudan. S-U-D-A-N.
 17 Q. And why did you do that?
 18 A. Because the group LIFG moved to the Sudan.
 19 Q. And why did the group move to the Sudan?
 20 A. To start in the actual direct confrontation
 21 with the Gaddafi regime and because the Sudan,
 22 geographically, is close to Libya.
 23 Q. Okay. And the entire camp left?
 24 A. Yes, all the camp, all the camp.

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1 Q. And at the time --
 2 A. As persons. All the members of LIFG moved to
 3 the Sudan.
 4 Q. And at the time, were there still 20 members?
 5 A. Of course, I am talking about the whole group
 6 that has moved to the Sudan, the persons that
 7 have moved to the Sudan.
 8 Q. At the time you left Afghanistan, the camp in
 9 Afghanistan, I think you said there were 20
 10 members of the LIFG there, is that correct?
 11 A. Yes.
 12 MS. SHAMSI: Objection. You may
 13 answer.
 14 BY MR. SMITH:
 15 Q. And all 20 of you left for the Sudan?
 16 A. Yes.
 17 Q. And where did you go in the Sudan?
 18 A. To Khartoum.
 19 Q. Spell that, please.
 20 A. K-H-A-R-T-O-U-M.
 21 Q. And what type of living facility did you have
 22 in Khartoum?
 23 A. I lived in one of the houses, rental houses,
 24 that was rented by LFG -- LIFG.

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1 Q. Okay. And were there other members of the
 2 LIFG who joined the 20 of you in Khartoum?
 3 A. Yes.
 4 Q. How many?
 5 A. I don't know exactly.
 6 Q. Was it more than a hundred?
 7 A. I don't know exactly. Tens. Tens. Tens of
 8 them.
 9 Q. Okay. And during this period of time, what
 10 exactly did you do in Khartoum?
 11 A. We were bringing people to the Sudan, the LIFG
 12 was bringing people to the Sudan -- to Libya.
 13 Q. So you were recruiting additional members?
 14 A. The present group were entering inside Libya
 15 to start the actual movement against
 16 Al-Gaddafi regime and to make that regime
 17 drop.
 18 Q. And this was in 1995?
 19 A. Yes. Yes.
 20 Q. Okay. So between 1995 and 1997, what exactly
 21 did you do for the LIFG?
 22 A. At that time, I passed through a period of
 23 illness or sickness. We were encouraging
 24 people to resist Gaddafi and to direct them

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1 for fighting against Al-Gaddafi and what they
 2 have to be doing.
 3 Q. Were you involved in combat during that
 4 period, 1995 through '97?
 5 A. No. Directly, no.
 6 Q. What about indirectly?
 7 A. In the support and encouragement or invoking
 8 and enlightenment.
 9 Q. Now, you said during this period of time, the
 10 LIFG was paying for your expenses, for housing
 11 and clothing and food and the like?
 12 A. Yes.
 13 Q. Where did the LIFG get its money?
 14 A. From charities and the Zakah. Z-A-K-A-H.
 15 Q. What were the names of the charities?
 16 A. I do not understand.
 17 Q. Okay. I think, Mr. Soud, you said that the
 18 LIFG received its money from charities and the
 19 Zakah, is that correct?
 20 A. No, not from charities. I did not mention
 21 charities. What I mentioned is Sadaqt.
 22 Q. Spell that, please.
 23 A. S-A-D-A-Q-T.
 24 Q. And what is Sadaqt?

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1 A. I mean that there are individuals who have
 2 convictions, they are convinced that the
 3 Gaddafi regime is an unjust regime, and have a
 4 conviction that that regime is a dictatorial
 5 one and that it's a must to get rid of the
 6 regime of Gaddafi. Those individuals are
 7 totally convinced that the LIFG is doing this
 8 task.
 9 Q. Do you know the names of those individuals?
 10 A. No.
 11 Q. Do you know the names of any of them?
 12 A. No. This is none of my business and within
 13 the group this is not my business to know and
 14 I don't know.
 15 Q. Now, during this period of time, did you get
 16 any form of salary from the LIFG?
 17 A. Not as salaried, but it's like they take over
 18 the daily -- my daily living, and I obtained
 19 assistance to get married.
 20 Q. Any cash? Were you given cash periodically?
 21 A. Yes. The cash was at the time where I was
 22 assisted to get married, for like assistance
 23 to be married.
 24 Q. And when did you get married?

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1 A. I married in 2000.
 2 Q. 2000?
 3 A. I got married in 2000.
 4 Q. So let me just cover the period 1997 through
 5 2000. You left the Sudan and returned to
 6 Afghanistan?
 7 A. And Pakistan.
 8 Q. Why did you do that?
 9 A. Because of the noticeable activity that the
 10 group adopted towards the regime of Gaddafi.
 11 Q. Did the entire LIFG camp leave the Sudan and
 12 return to Afghanistan and Pakistan?
 13 MS. SHAMSI: Objection. You may
 14 answer.
 15 THE WITNESS: No.
 16 BY MR. SMITH:
 17 Q. So some people stayed in Khartoum?
 18 A. For a period of time, yes.
 19 Q. How many people left Khartoum with you to
 20 return to Afghanistan and Pakistan?
 21 A. About from 20 to 25.
 22 Q. Okay. And why is it that 20 to 25 people
 23 left?
 24 A. They left, as I mentioned to you, because of

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1 the actual activity against the Gaddafi
 2 regime, and the LFG (sic) was adopting several
 3 activities aiming at the person Al-Gaddafi.
 4 Because of this activities, a lot -- a big
 5 pressure was imposed by Gaddafi upon the
 6 Sudanese government to expel all the Libyans
 7 from Sudan, the Sudan. That was the reason
 8 for me, personally, to move to Pakistan and
 9 Afghanistan.
 10 Q. Were you expelled from the Sudan?
 11 A. Yes. Correct. Yes.
 12 Q. And the other 20 or 25 people that left with
 13 you, were they expelled, also?
 14 A. Yes.
 15 Q. And what was the name that you were using when
 16 you were expelled from the Sudan?
 17 A. Abdel Kareem.
 18 Q. When you left the Sudan, did you go to
 19 Pakistan or Afghanistan?
 20 A. Initially, I went to Pakistan and I stayed
 21 there for a period of time. After that, I was
 22 moving between Pakistan and Afghanistan.
 23 Q. And were you moving with the 20 or 25 other
 24 people?

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1 A. No. No. Alone.
 2 Q. Why were you alone at that point?
 3 A. I was moving alone and without the rest of the
 4 group because I traveled there on my own and I
 5 was moving on my own between these two
 6 countries, Pakistan and Afghanistan.
 7 Q. Why were you moving alone?
 8 A. That suited me. I was going, I knew the way,
 9 I knew how to move from one place to the
 10 other. I did not need anybody to accompany
 11 me.
 12 Q. And do you know what the other members of that
 13 20 to 25 person group that left the Sudan,
 14 what they were doing?
 15 A. Not exactly I knew what they were doing, but I
 16 know that some of them were -- were studying
 17 the Sharia studies in Pakistan.
 18 Q. Where in Pakistan were you?
 19 A. In Peshawar.
 20 Q. And when you would go back and forth from
 21 Pakistan to Afghanistan, where would you go in
 22 Afghanistan?
 23 A. To Jalalabad and Kabul.
 24 Q. And why did you go there?

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1 INTERPRETER: The interpreter would
 2 just like to clarify something.
 3 (Translation.)
 4 THE WITNESS: Some of the LIFG, the
 5 Libyan group, was there in Jalalabad.
 6 BY MR. SMITH:
 7 Q. Now, during what period of time did you
 8 continue to move from Pakistan to Afghanistan
 9 during this '97 through 2000 period?
 10 MS. SHAMSI: Objection. You may
 11 answer.
 12 THE WITNESS: May I have a
 13 repetition for the question?
 14 BY MR. SMITH:
 15 Q. I'm sorry?
 16 A. May I have a repetition of the question?
 17 Q. Does the witness want it read back?
 18 A. A repetition.
 19 Q. Do you want me to rephrase it?
 20 Let me do this, I'll withdraw the
 21 question. Let's try this.
 22 A. No. No.
 23 Q. You left the Sudan in 1997, correct?
 24 A. Yes.

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1 Q. And then you returned to Pakistan, and then
 2 for some period of time went from Pakistan to
 3 Afghanistan and back and forth, correct?
 4 A. Yes.
 5 Q. And how long did that go on?
 6 A. It continued for the lengths of this period.
 7 Q. Up until I think you left in 2000?
 8 A. Yes.
 9 Q. Now, what were you doing with yourself in
 10 Pakistan and Afghanistan during this time?
 11 A. I frequented the camp belonging to LIFG.
 12 Q. And was that the camp in Afghanistan?
 13 A. Yes.
 14 Q. And was there a camp in Kabul and a camp in
 15 Jaleel (sic)?
 16 A. No. It was a camp in Jalalabad that moved to
 17 Kabul.
 18 Q. Okay. And when you were in Pakistan, were you
 19 at a camp in Pakistan?
 20 MS. SHAMSI: Objection. You may
 21 answer.
 22 THE WITNESS: No. No.
 23 BY MR. SMITH:
 24 Q. No. Okay.

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1 Where did you stay in Pakistan?
 2 A. In rented houses by the LIFG.
 3 Q. In which towns?
 4 A. In Peshawar.
 5 MR. SMITH: Could you spell that,
 6 please?
 7 INTERPRETER: P-I-S-H-A-W-E-R.
 8 MS. SHAMSI: Let me just -- this one
 9 I know. Let me correct that. It's
 10 P-E-S-H-A-W-A-R.
 11 MR. SMITH: Thank you.
 12 Do you agree with that? Everybody?
 13 (All nodding.)
 14 MR. SMITH: Okay.
 15 BY MR. SMITH:
 16 Q. When you were in Peshawar, what would you do?
 17 A. It was only for visiting the others, for
 18 buying private things or personal things for
 19 me, receiving treatment.
 20 Q. And then you would return from Peshawar back
 21 to the camp at either Jalalabad or Kabul, is
 22 that right?
 23 A. Yes.
 24 MR. SMITH: Okay. Now, I think we

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1 need to stop.
 2 MS. SHAMSI: Yes.
 3 MR. SMITH: Yeah. So let's go off
 4 the record.
 5 VIDEOGRAPHER: The time is 12:14.
 6 We're off the record.
 7 (Break: 12:14 p.m.)
 8 * * * * *
 9 AFTERNOON SESSION
 10 * * * * *
 11 VIDEOGRAPHER: Back on the record.
 12 The time is 1:22.
 13 BY MR. SMITH:
 14 Q. Mr. Soud, are you ready to proceed?
 15 A. Yes.
 16 Q. Are you feeling okay? Are you able to go
 17 forward?
 18 A. Yes.
 19 Q. Now, just before the lunch break, we were
 20 talking about that period of time between 1997
 21 and 2000. Do you remember that?
 22 A. Yes.
 23 Q. Now, during that period of time, did you
 24 participate in any combat?

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1 A. No.
 2 Q. During that period of time, did you hold any
 3 leadership positions in the LIFG?
 4 A. Yes. From the period from '98 to 2000, I was
 5 a responsible about the management of -- or
 6 the administration, administering the camp.
 7 Q. Who put you in charge of that?
 8 INTERPRETER: The -- the interpreter
 9 is going to ask for a clarification.
 10 (Translation.)
 11 A. The responsible of the LIFG. (Sic.)
 12 Q. Who is the person who put you in charge of the
 13 administrative activities at the camp in
 14 Afghanistan, what's that person's name?
 15 A. It was Mr. Abdelhakim Belhadj. Abdelhakim,
 16 A-B-D-A-L-H-A-K-E-E-D (sic), Belhadj,
 17 B-L-H-A-J (sic), is responsible about LIFG, he
 18 was the one who gave the order that I
 19 administer or manage the camp, the training
 20 camp. I received this appointment through
 21 Khalid al-Sharif. K-H-A-L-E-D (sic).
 22 A-S-H-A-R-E-E-F (sic).
 23 MR. ALHALABI: Just a correction.
 24 It should be an "M" at the end of the

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1 "Abdelhakim." It's not "Abdelhakeed." It's
 2 "Abdelhakim."
 3 INTERPRETER: Abdelhakim, yeah.
 4 MR. SMITH: Do you -- just so we're
 5 clear here, you're the official interpreter,
 6 but we want to hear from the ACLU's
 7 interpreter, but I want to make sure that you
 8 accept what he's saying.
 9 INTERPRETER: Yes. I accept what
 10 he's saying.
 11 MR. SMITH: Okay. And can you give
 12 me the full name of that person, again, while
 13 there's no question pending?
 14 INTERPRETER: Abdelhakim Belhadj.
 15 It's A-B-A-D-A-L-H-A-K-E-E-M (sic). B --
 16 last, B-E-L-H-A-J (sic).
 17 BY MR. SMITH:
 18 Q. Okay. Now, Mr. Soud, was it Abdelhakim
 19 Belhadj who put you in charge of the
 20 administrative responsibilities?
 21 MS. SHAMSI: Objection. You may
 22 answer.
 23 THE WITNESS: Yes. And that is
 24 Khalid al-Sharif, from Abdelhakim to Khalid

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1 al-Sharif.
 2 BY MR. SMITH:
 3 Q. Okay. So Abdelhakim Belhadj advised Khalid
 4 al-Sharif and Sharif told you that you're in
 5 charge, is that how it went?
 6 A. Yes.
 7 Q. Okay. So who is Khalid al-Sharif?
 8 A. Khalid al-Sharif, he is one of the leaders of
 9 LIFG group and he is the second man in the
 10 LIFG.
 11 Q. Okay. Who --
 12 A. And he is the military responsible person in
 13 the LIFG.
 14 Q. And was he on the camp with you or at the camp
 15 with you?
 16 A. He lived at Peshawar and he would come from
 17 time to time.
 18 Q. And who is Abdelhakim Belhadj?
 19 A. Abdelhakim Belhadj, he is the person who is
 20 responsible about the LIFG and he is the first
 21 lead -- leader for the LIFG.
 22 Q. And was he at the camp with you in
 23 Afghanistan?
 24 A. No.

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1 Q. Did you ever meet with him?
 2 A. Yes, several times.
 3 Q. Now, what were your duties and
 4 responsibilities as the person in charge of
 5 the administrative parts of the camp?
 6 MS. SHAMSI: Objection. You may
 7 answer.
 8 THE WITNESS: My responsibility was
 9 to administer the camp and to supervise the
 10 training.
 11 BY MR. SMITH:
 12 Q. Tell me what you mean by administer the camp.
 13 A. It means to oversee the logistics of the camp,
 14 how -- to oversee about the personnel who are
 15 there inside the camp.
 16 Q. What logistics did you oversee?
 17 A. To give training sessions and to supervise the
 18 training sessions.
 19 Q. We're going to get to training, but I want to
 20 understand logistics. What logistics did you
 21 oversee?
 22 A. The meaning of the giving the logistics is to
 23 supervise the daily life inside the camp,
 24 whether in the presence of training or no

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1 training.

2 Q. During this period of time, 1998 to 2000, was

3 there anyone who had more authority at the

4 camp than you?

5 MS. SHAMSI: Objection. You may

6 answer.

7 THE WITNESS: From the period of '98

8 to ninety -- to the end of '99, I was the

9 responsible person about managing or

10 administering the camp.

11 BY MR. SMITH:

12 Q. Was there anyone between the period 1998

13 through 2000 who had more authority at the

14 camp than you?

15 MS. SHAMSI: Objection. You may

16 answer.

17 THE WITNESS: No. I was the

18 responsible one.

19 BY MR. SMITH:

20 Q. Now, did part of your oversight of logistics

21 include planned attacks?

22 INTERPRETER: The interpreter didn't

23 get the last word.

24 MR. SMITH: Okay. Could you repeat

Page 75

1 the question, madam court reporter, and I'll

2 rephrase it, if I need to.

3 (Whereupon, the last question was

4 read back by the court reporter as

5 requested.)

6 THE WITNESS: No.

7 BY MR. SMITH:

8 Q. You said that you supervised training. What

9 kind of training did you supervise?

10 A. The training at the camp was for LI -- the

11 camp of LIFG, it was representing the virtual

12 reality that personnel would work in at the

13 LIFG. We were training using weapons, using

14 weapons, the sports-like training how to

15 defend oneself.

16 INTERPRETER: And the interpreter

17 would like to make a correction. We were

18 training concerning the types of weapons --

19 MR. SMITH: I'm sorry. The types?

20 INTERPRETER: The types of weapons.

21 We were training about how to use the weapons

22 and sports activities that enable us to

23 protect ourselves.

24 MR. ALHALABI: Also, if I may add,

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1 I'm sorry, I don't know about virtual reality.

2 He didn't say that. He said it's about

3 reality and circumstances.

4 INTERPRETER: No. He said (speaking

5 in Arabic.)

6 (Conversation between interpreters

7 in Arabic.)

8 INTERPRETER: I couldn't -- it could

9 be a mistake, but this is what he had uttered.

10 MR. ALHALABI: Okay.

11 INTERPRETER: There was a

12 clarification about the interpreter mentioning

13 the virtual reality that personnel are working

14 in in the LFG (sic) camp.

15 BY MR. SMITH:

16 Q. How many people were you training, Mr. Soud,

17 during this period of time?

18 A. At the period that I was responsible about

19 this camp, about 30 persons.

20 Q. And where did these people come from?

21 A. Those persons, some were from the Sudan and

22 some came from Libya.

23 Q. And what types of weapons were you training

24 these individuals?

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1 A. Light weaponry and in personal weapon.

2 Q. Can you identify the weapons for the record?

3 A. Probably, it's possible that one trains to use

4 a pistol or a handgun. We are talking about

5 the Kalashnikov, which is the AK-47.

6 Q. What kind of pistols were you training these

7 individuals with?

8 A. I used the general knowledge about these

9 weapons and I teach -- or I trained how to aim

10 and how to use these weapons.

11 Q. Can you identify what types of pistols you

12 trained these individuals with?

13 A. Russian-made pistols.

14 Q. Can you be for specific?

15 A. A pistol, Tokarev, a Makarov.

16 Q. Can you spell these, please?

17 A. A .9 millimeter.

18 Q. Nine millimeter?

19 A. Yes.

20 Q. Okay.

21 INTERPRETER: Tokarev, Makarov, the

22 interpreter has no idea how to spell that

23 except that how it's pronounced.

24 MR. SMITH: Maybe our other

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1 interpreter could help us out.
 2 MR. ALHALABI: Possibly, how it's
 3 pronounced. I'm not familiar with the
 4 spelling.
 5 MR. SMITH: I'll take whatever one
 6 either one of you want to give me.
 7 (Conversation between interpreters.)
 8 THE INTERPRETER: Makarov and
 9 Tokarev.
 10 BY MR. SMITH:
 11 Q. Can you give us your best spelling on the
 12 record, please?
 13 A. A-M-A-R-A-O-O-F and T-A-C-R-O-O-F (sic),
 14 Makarov, Tokarev.
 15 Q. Who supplied these pistols to you?
 16 A. These pistols are provided by the Libyan
 17 group, the fighting Libyan group, the LIFG.
 18 Q. And where did the LIFG acquire these guns?
 19 A. They buy it from the market, buy it from
 20 Pakistan.
 21 Q. Did you ever buy guns from Pakistan?
 22 A. No.
 23 Q. Did you ever buy guns in the market?
 24 A. No.

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1 Q. Are you familiar with the term "black market"?
 2 A. There is a region in Pakistan where weaponry
 3 would be sold there in a usual and normal
 4 fashion.
 5 Q. Is that part of the black market?
 6 MS. SHAMSI: Objection. You may
 7 answer.
 8 THE WITNESS: Nearly.
 9 BY MR. SMITH:
 10 Q. Can you explain, Mr. Soud, what you understand
 11 the black market to be?
 12 A. Would you repeat the question?
 13 MR. SMITH: Could you read back,
 14 please.
 15 (Whereupon, the last question was
 16 read back by the court reporter as
 17 requested.)
 18 THE WITNESS: I do not know the
 19 exact meaning of the word "black market," but
 20 what was there in Pakistan, that there were
 21 some market -- markets outside of the -- or
 22 not under the control of the government and
 23 that is within the tribal areas where weaponry
 24 was sold.

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1 BY MR. SMITH:
 2 Q. And where is that in Pakistan?
 3 A. In Peshawar.
 4 Q. And what form of currency was used to pay for
 5 the weapons?
 6 A. The Pakistani currency.
 7 Q. Did the training that you supplied during the
 8 years 1998 through 2000 involve anything in
 9 addition to training with weaponry?
 10 MS. SHAMSI: Objection. You may
 11 answer.
 12 THE WITNESS: There was the written
 13 side of it and the -- it's like to invoke the
 14 efforts, that's what we used to do in the
 15 training camp, and that is to direct the
 16 personnel for the real goals of the LIFG,
 17 which is, per se, the only thing that was
 18 directed towards, was to topple off the
 19 Gaddafi regime.
 20 BY MR. SMITH:
 21 Q. Was there any training related to bombs?
 22 A. There was a training on how to use hand
 23 grenades.
 24 Q. Who supplied the hand grenades?

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1 A. They're from market, from the market.
 2 Q. The same market where you purchased the
 3 weaponry in Pakistan?
 4 MS. SHAMSI: Objection.
 5 THE WITNESS: Yes.
 6 BY MR. SMITH:
 7 Q. Were these -- what country was the manufacture
 8 of these grenades?
 9 A. Russia. Russia.
 10 Q. Now, was part of the purpose of the training
 11 to teach people how to kill people?
 12 A. We were being trained as to how to kill
 13 Gaddafi because Gaddafi is our first and last
 14 enemy.
 15 Q. And did you also train these people to kill
 16 anyone associated with Gaddafi?
 17 A. Gaddafi was a person who had a regime, who had
 18 security establishments or security
 19 departments through which he -- they would
 20 kill, torture, abduct people, and we aimed to
 21 kill him, that was our aim, and those who
 22 would obstruct our way to do that. There is
 23 no differentiation for us between Gaddafi and
 24 his oppressive practice that aim at killing

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1 and maiming and torturing people.
 2 Q. So you trained these people to kill anyone
 3 associated with Gaddafi, as well?
 4 MS. SHAMSI: Objection.
 5 THE WITNESS: No.
 6 MS. SHAMSI: You may answer.
 7 BY MR. SMITH:
 8 Q. Well, who were they trained to kill in
 9 addition to Gaddafi?
 10 A. His oppressive entourage that are protecting
 11 him, defending him, and who are killing and
 12 torturing people, who are responsible about
 13 killing and torturing people. There are
 14 persons within the Gaddafi regime we do not
 15 consider them our enemy because Gaddafi does
 16 not use them in killing people.
 17 Q. Mr. Soud, have you ever killed a man?
 18 A. No.
 19 Q. Now, in 2000, you left Afghanistan for about
 20 ten months, is that correct?
 21 A. Correct.
 22 Q. Where did you go?
 23 A. I went to Turkey.
 24 Q. Why did you do that?

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1 A. I went to Turkey for the purpose of getting
 2 married.
 3 Q. Any other purpose?
 4 A. No other purpose.
 5 Q. Okay. And you were in Turkey for about ten
 6 months?
 7 A. About, yes.
 8 Q. And why did you go to Turkey to get married?
 9 A. Because my wife, I could not meet my wife
 10 except in Turkey.
 11 Q. When did you meet your wife?
 12 A. At the beginning of 2000.
 13 Q. And where did you meet?
 14 A. In Istanbul, Turkey.
 15 Q. And how long were you together before you got
 16 married?
 17 MS. SHAMSI: Objection. You may
 18 answer.
 19 THE WITNESS: We married right away.
 20 BY MR. SMITH:
 21 Q. So I understand, you went to Turkey, you met
 22 your wife, and then you got married almost at
 23 the same time?
 24 A. Yes.

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1 Q. And did you know her before you met her in
 2 Turkey?
 3 A. It was through one of the acquaintances, he
 4 was the one who has helped me to get in
 5 contact with this family and that helped me to
 6 get to marry her.
 7 Q. And you stayed in Turkey for about ten months?
 8 A. Yes.
 9 Q. What did you do while you were there?
 10 A. Nothing.
 11 Q. No job?
 12 A. No.
 13 Q. And how did --
 14 A. There is no work.
 15 Q. How were you able to support yourself and your
 16 new wife?
 17 A. That was -- that was done through the LIFG.
 18 Q. And how was it done through the LIFG?
 19 A. That was by giving me a sum of money that I
 20 got married using and I spent -- I was
 21 spending it over -- for -- for my like daily
 22 life for the period that I stayed over there.
 23 Q. And where were you living in Turkey?
 24 A. Istanbul.

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1 Q. So the entire ten months, you were in
 2 Istanbul?
 3 A. Yes.
 4 Q. And did you remain in communication with
 5 representatives from the LIFG while you were
 6 in Istanbul?
 7 A. Yes.
 8 Q. Who were you in communication with?
 9 A. With Abdelhakim Belhadj.
 10 Q. Anyone else?
 11 THE INTERPRETER: Anybody else?
 12 MR. SMITH: I think you need a
 13 translation. It's all right.
 14 I looked up that name over lunch.
 15 MR. ALHALABI: Was I right or was I
 16 right?
 17 MR. SMITH: You were right.
 18 THE WITNESS: Abdel Saber.
 19 A-B-D-E-L. S-A-B-E-R. And Abu Mohamed.
 20 A-B-U. M-O-H-A-D (sic.) Zoubeer,
 21 Z-O-U-B-E-E-R.
 22 BY MR. SMITH:
 23 Q. And what were you and Mr. Belhadj talking
 24 about during this period of time?

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1 A. Personal matters, because at that time I was
 2 in a period of marriage and the LIFG have
 3 considered that I am at this particular
 4 specific period, marriage period, so they were
 5 asking me about my marriage, how things are
 6 going, and that after the end of that period,
 7 I have to go back to Afghanistan.
 8 Q. Now, how did you communicate with Mr. Belhadj?
 9 A. He was there in Turkey with me.
 10 Q. So you had face-to-face meetings with him?
 11 A. Yes.
 12 Q. Did you have a cell phone at that point in
 13 time?
 14 A. No.
 15 Q. Who is Abdel Saber?
 16 A. He was a person from the group of LIFG and he
 17 was there, he resided in Istanbul.
 18 Q. And what was his position with the LIFG?
 19 A. He was a person, he was a member of the LIFG,
 20 he was a normal person. He did not have any
 21 responsibilities within the LIFG.
 22 Q. And who is Abdul Mohamed?
 23 A. Abu Mohamed and Abu Zoubeer were also members
 24 in the LIFG.

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1 Q. What did they do for the LIFG?
 2 A. I did not know about the responsibilities they
 3 were asked to carry. All I -- what I know is
 4 that they have been captured and were
 5 delivered to the Gaddafi regime. I knew,
 6 later, that one of them was executed.
 7 Q. Okay. Why did you return to Afghanistan at
 8 the end of 2000?
 9 A. Abdelhakim Belhadj asked me to go back.
 10 Q. Were you in charge of the camp when you
 11 returned?
 12 A. No. I was not responsible.
 13 Q. Who was responsible for the camp when you
 14 returned?
 15 A. It was another person who was called Abu
 16 Sahel. A-B-U. S-A-H-E-L.
 17 Q. What was your position when you returned?
 18 A. I was still -- I was still like on -- at my
 19 level in the camp without any -- without
 20 responsibility for this place.
 21 Q. What was your understanding about why you were
 22 sent back to the camp?
 23 A. Because of the bad situation in Turkey
 24 concerning security and capturing some of the

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1 personnel -- or the members from LIFG and
 2 giving -- handing them over to Gaddafi,
 3 Abdelhakim Belhadj asked me to go back to
 4 Afghanistan to secure myself.
 5 Q. Did you believe you were at risk if you stayed
 6 in Istanbul?
 7 A. Yes, a big danger.
 8 Q. And why did you think you were at risk?
 9 A. The Gaddafi regime assumed going after members
 10 of LIFG who are outside, or outside Libya,
 11 because of all those activities that the LIFG
 12 assumed, targeting, toppling Gaddafi, and he
 13 dealt with a lot of countries to help him, in
 14 a way, to obtain information in how to get us
 15 and how to get us back to him.
 16 When the two persons -- or the two
 17 members of LIFG were captured in Turkey,
 18 Al-Gaddafi intelligence made a deal with the
 19 head of the prison outside the boundary of law
 20 and in exchange of monetary sums. The
 21 custodian of the prison delivered those -- or
 22 handed over these persons to Gaddafi. For
 23 this, I had to get out and secure myself.
 24 Q. So you thought that the Turkish officials

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1 would take you into custody if you stayed in
 2 Turkey?
 3 A. Who detains me or who captures me, it would be
 4 the Gaddafi intelligence or those who are
 5 collaborating with the Gaddafi and this is to
 6 hand me over to them.
 7 Q. And did you have any knowledge that Turkish
 8 officials were collaborating with Gaddafi?
 9 A. Yes, through the deal that was effected and
 10 that which resulted in handing of the two
 11 persons, the two members.
 12 Q. Now, when you left Turkey to return to
 13 Afghanistan, did your wife go with you?
 14 A. Yes.
 15 Q. And, at that time, did you have a child?
 16 A. No. Later --
 17 Q. Okay.
 18 A. -- on.
 19 Q. And how long did you stay in Afghanistan once
 20 you arrived at the camp?
 21 A. Till sometime before the events of September.
 22 Q. September, being 9-11?
 23 A. Yes.
 24 Q. Now, when you returned to Afghanistan with

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1 your wife in the end of 2000, was she aware of
 2 your participation in the LIFG?
 3 MS. SHAMSI: Objection. You may
 4 answer.
 5 THE WITNESS: Semi or partial
 6 knowledge. She knows that I am opposing the
 7 Gaddafi regime and that I am amongst those who
 8 are opposing this regime.
 9 BY MR. SMITH:
 10 Q. Did she know that you were a part of an armed
 11 Islamic group designed to overthrow Gaddafi
 12 since you had left college?
 13 A. Yes.
 14 Q. During the period of time that you were back
 15 in Afghanistan on the camp, what -- what were
 16 your duties and responsibilities?
 17 A. There were no big responsibilities and that is
 18 because I was consumed with my marital life
 19 more than before, only administering some
 20 training sessions at the camp.
 21 Q. And this is training with weaponry?
 22 A. Yes.
 23 Q. And the training, was it how to shoot the gun?
 24 A. How to use the pistol and how to use the

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1 weapon.
 2 Q. And you said that you left the camp in
 3 Afghanistan sometime before September 11,
 4 2001, is that right?
 5 A. Yes.
 6 Q. Why did you leave?
 7 A. That is because my wife wanted to move to --
 8 wanted to move and to live in Pakistan to
 9 receive some medical care related to her.
 10 Q. Did you need to get permission from the LIFG
 11 to leave Afghanistan?
 12 A. They were not objecting to these personal
 13 matters, that I would receive medical care.
 14 Q. Who did you ask?
 15 A. I told them. I told them that I would go to
 16 Pakistan to receive some medical attention. I
 17 told Khalid al-Sharif about this.
 18 Q. I'm sorry. Who did he tell?
 19 A. Khalid al-Sharif.
 20 Q. Where was Sharif when you told him?
 21 A. He was with us in Afghanistan.
 22 Q. Did you communicate with Belhadj your
 23 intention to leave Afghanistan?
 24 A. No.

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1 Q. So you left Pakistan -- strike that.
 2 You left Afghanistan when?
 3 A. Before the events of 11 (sic). I cannot
 4 recall exactly when, but about that time, I
 5 left.
 6 Q. Was it several days, several weeks before
 7 9-11?
 8 A. You can say weeks.
 9 Q. Okay. And who in addition to you and your
 10 wife left the camp to go to Pakistan?
 11 A. I don't know about anyone, they were there in
 12 Pakistan.
 13 Q. No, but when you left the camp in Afghanistan,
 14 was it just the two of you who left or were
 15 there people in addition to the two of you?
 16 A. Repeat the question, please.
 17 MR. SMITH: Could you read it back,
 18 please.
 19 (Whereupon, the last question was
 20 read back by the court reporter as
 21 requested.)
 22 THE WITNESS: Okay. When I got
 23 married, I did not live on camp. I had my
 24 separate residency in Kabul, and I left from

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1 Kabul to Pakistan, myself and my wife.
 2 BY MR. SMITH:
 3 Q. How did you travel from Istanbul to Kabul?
 4 A. By land, through Tehran.
 5 Q. Was it in an automobile?
 6 A. Yes, in a bus.
 7 Q. Okay. And who supplied the bus?
 8 A. Public transportation.
 9 Q. And when you were traveling from Istanbul to
 10 Kabul, were you carrying your weapons?
 11 A. No.
 12 Q. No. Okay.
 13 When you traveled from -- so you
 14 went -- you left Istanbul, through Tehran, to
 15 Kabul and you didn't go to the camp. Why?
 16 A. I left from Istanbul to Kabul and I told you
 17 that I went to the camp.
 18 Q. Oh. How long did you stay at the camp?
 19 A. Weeks.
 20 Q. And then you left the camp for your own
 21 private residence in Kabul?
 22 A. Yes.
 23 Q. And how long did you stay at that private
 24 residence?

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<p>1 A. The whole period, I stayed in Kabul.</p> <p>2 Q. Was it a year, a month?</p> <p>3 A. Months.</p> <p>4 Q. Okay. And then you left to go to where in</p> <p>5 Pakistan?</p> <p>6 A. I went to Karachi.</p> <p>7 Q. And where did you stay in Karachi?</p> <p>8 A. Karachi is a vast place and I was going from</p> <p>9 one place to the other.</p> <p>10 Q. With your wife?</p> <p>11 A. Yes.</p> <p>12 Q. And why were you going from one place to</p> <p>13 another?</p> <p>14 A. There, my wife was expecting. There was -- my</p> <p>15 wife and I was expecting a baby. I needed to</p> <p>16 move around, to move from one hospital to the</p> <p>17 other. I was moving from one place to the</p> <p>18 other and this is through the interest.</p> <p>19 Q. Why were you moving from one place to another?</p> <p>20 A. Of course, after the events of September, the</p> <p>21 security situation became very uptight in</p> <p>22 Karachi and there was -- you know, there was,</p> <p>23 you know, a problem for the Arab -- the Arab</p> <p>24 person in Karachi, being there.</p>	<p>1 my wife who needed some medical attention</p> <p>2 because of pregnancy.</p> <p>3 BY MR. SMITH:</p> <p>4 Q. Did you think that Pakistani officials were</p> <p>5 seeking to arrest you following the events of</p> <p>6 September 11th, 2001?</p> <p>7 MS. SHAMSI: Objection.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. SMITH:</p> <p>10 Q. Then, why were you jumping from place to</p> <p>11 place?</p> <p>12 A. To secure myself and for fear of a possible</p> <p>13 mistake.</p> <p>14 Q. I see.</p> <p>15 Now, how long did you continue</p> <p>16 moving from place to place?</p> <p>17 A. I stayed in Karachi till my wife delivered.</p> <p>18 Q. When was that?</p> <p>19 A. That was about -- in the seventh month of</p> <p>20 2002.</p> <p>21 Q. So that would be July of 2002?</p> <p>22 A. Yes.</p> <p>23 Q. And you left Karachi to go where?</p> <p>24 A. I left Karachi, went to Peshawar.</p>
<p>Page 95</p> <p>1 Q. So you thought --</p> <p>2 A. I was obligated to protect myself and secure</p> <p>3 my wife and myself.</p> <p>4 Q. Mr. Soud, is it your testimony that after 9-11</p> <p>5 you thought that Pakistani authorities were</p> <p>6 looking for you?</p> <p>7 MS. SHAMSI: Objection.</p> <p>8 THE WITNESS: No, does not look for</p> <p>9 me.</p> <p>10 BY MR. SMITH:</p> <p>11 Q. Well, why -- who did you think was pursuing</p> <p>12 you in Pakistan after 9-11?</p> <p>13 MS. SHAMSI: Objection.</p> <p>14 THE WITNESS: There was a huge</p> <p>15 security, like watch, on the watch, in</p> <p>16 Pakistan, and Pakistan was targeting any Arab,</p> <p>17 any Arab person who would be there in</p> <p>18 Pakistan.</p> <p>19 BY MR. SMITH:</p> <p>20 Q. Well, why did you leave Afghanistan to go to</p> <p>21 Pakistan knowing that?</p> <p>22 MS. SHAMSI: Objection.</p> <p>23 THE WITNESS: I left Afghanistan to</p> <p>24 go to Pakistan because of the circumstances of</p>	<p>Page 97</p> <p>1 Q. To Peshawar. To where?</p> <p>2 A. Peshawar.</p> <p>3 Q. And how long did you stay there?</p> <p>4 A. Till I was detained or captured in 2003.</p> <p>5 Q. Now, during the period -- well, strike that.</p> <p>6 When were you detained in 2003?</p> <p>7 A. 3-4, 2003.</p> <p>8 Q. 3-4, so March?</p> <p>9 A. April.</p> <p>10 Q. April. Now, between the period July of 2002</p> <p>11 until April 2003, what did you do in Peshawar?</p> <p>12 A. Repetition.</p> <p>13 MR. SMITH: Repeat it?</p> <p>14 INTERPRETER: Want me to repeat?</p> <p>15 MR. SMITH: Sure.</p> <p>16 (Translation.)</p> <p>17 THE WITNESS: I went to Peshawar</p> <p>18 because there was the remaining members of the</p> <p>19 LIFG, they were in Peshawar, and I was</p> <p>20 thinking with them about the way to get out of</p> <p>21 Pakistan.</p> <p>22 BY MR. SMITH:</p> <p>23 Q. Who supported you during that period of time?</p> <p>24 A. It was the LIFG.</p>

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1 Q. And how did they go about supporting you, did
2 they give you cash?
3 A. Yes.
4 Q. Who gave you the cash?
5 A. Khalid al-Sharif.
6 Q. Spell that, please.
7 A. K-A-H-A-L-E-D. A-L-S-H-A-R-E-E-F. (Sic.)
8 Q. And how much cash were you given by Sharif on
9 a monthly basis?
10 A. He took over the rent for the house and the
11 monthly expenses.
12 Q. How much cash would he give you on a monthly
13 basis?
14 A. Four thousand rupee, about, nearly.
15 Q. And what did you do, if anything, in exchange
16 for this cash?
17 A. I did not understand the question.
18 Q. So you were -- you were in Peshawar from July
19 of '02 through April '03, correct?
20 A. Yes.
21 Q. And the LIFG was paying all of your expenses
22 while you were there, correct?
23 A. Yes.
24 Q. What, if anything, did you do during that

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1 period of time for the LIFG?
2 A. We were being paid the -- these amount -- sums
3 of money and assistance not because of what we
4 were offering the LIFG, it was because we were
5 affiliated with the LIFG.
6 Q. Were you providing any services or assistance
7 to the LIFG during the period of time
8 July 2002 through April 2003?
9 A. At that time, I talked with Khalid al-Sharif
10 that I was going to leave Pakistan. And at
11 that time, the conditions of the travel did
12 not allow that and, in particular, the
13 situation of -- the health situation of my
14 wife did not allow for that. So the
15 circumstances were such that I didn't.
16 Q. Were you in hiding?
17 A. No.
18 Q. Did you walk the streets freely in Peshawar?
19 A. Yes.
20 Q. And did you apply for any jobs?
21 A. No.
22 Q. Why not?
23 A. I didn't want to do so. I was living in a --
24 normally and I was waiting for the -- the

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1 facilitating or the way that I can leave
2 Pakistan and travel.
3 Q. And where did you want to go if you could get
4 out of Pakistan?
5 A. I was thinking of going to Iran.
6 Q. Okay. And what did you intend to do in Iran?
7 A. Only to secure myself. And the group, LIFG,
8 asked me to do so.
9 Q. So did you intend to go to Iran to carry out
10 the causes of the LIFG?
11 MS. SHAMSI: Objection. You may
12 answer.
13 THE WITNESS: My goal was to join
14 some of the member of the LIFG who are there
15 in Iran.
16 BY MR. SMITH:
17 Q. To carry out their cause?
18 A. To continue our cause against the Gaddafi
19 regime.
20 Q. Mr. Soud, do you know the name Abu Faraj,
21 that's F-A-R-A-J, al-Libi, A-L hyphen L-I-B-I?
22 A. Yes.
23 Q. Who is that?
24 A. He is a Libyan national.

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1 Q. And how is it that you know him?
2 A. During my stay in Afghanistan.
3 Q. Was he part of the LIFG?
4 A. No.
5 Q. Why did you -- why were you with him in
6 Afghanistan?
7 A. I was not with him. I came to know him over
8 there, but I belonged to the LIFG and he
9 belongs to Al-Qaeda.
10 Q. How did you come to meet him in Afghanistan?
11 A. This is because Abu Faraj al-Libi is a Libyan
12 national and the LIFG is considered a Libyan
13 group. He used to frequent us from time to
14 time, this is because of the acquaintance and
15 because he is a Libyan person.
16 Q. So he would frequent the camp in Afghanistan?
17 MS. SHAMSI: Objection. You may
18 answer.
19 THE WITNESS: No. He does not
20 frequent the camp.
21 BY MR. SMITH:
22 Q. Did he, during the period of time that you
23 were at the camp in Afghanistan, did he
24 frequent that camp?

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1 A. No.
 2 Q. Was he ever at the camp?
 3 A. No, he did not visit the camp.
 4 Q. Well, where did you meet him in Afghanistan?
 5 A. We have a gathering place that we call the
 6 house of receiving guests or visiting guests
 7 and this is a place for the LIFG and it is
 8 situated within the city, it's a house, a
 9 rented house, that is occupied by people from
 10 the LIFG who are not in the camp.
 11 Q. What city?
 12 A. Jalalabad.
 13 Q. And why did Abu Faraj al-Libi have occasion to
 14 visit that house?
 15 A. There was no reason. It was a visit. It was
 16 like haphazard chance for him to visit.
 17 Q. And you knew that he was part of the group
 18 Al-Qaeda?
 19 A. Yes.
 20 Q. And he was a welcome guest?
 21 A. We are under the umbrella of the Libyan
 22 nationals and he would be welcome as a Libyan
 23 national. And we oppose his -- we oppose his
 24 attitude, that when it comes to Al-Qaeda, we

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1 have a vast difference when it comes to their
 2 vision and the ideology, but still, we are
 3 under the Islamic fraternity, umbrella, and
 4 between us, that bond of being -- of being
 5 Libyans.
 6 Q. When did you learn that Abu Faraj al-Libi was
 7 affiliated with Al-Qaeda?
 8 A. About 1992.
 9 Q. And how did you demonstrate to him that you
 10 opposed his attitude toward the mission of
 11 Al-Qaeda?
 12 A. I would tell him you are Libyan, you are a
 13 Libyan national, and you have got out of Libya
 14 and you have left that Gaddafi regime that
 15 would -- disregards the human rights and that
 16 would kill, detain, and would confiscate the
 17 civil liberties, why don't you think about the
 18 way to change that. You are a Libyan and a
 19 special responsibility or emphasis befalls on
 20 you to change this situation.
 21 Q. Mr. Soud, do you have an understanding of what
 22 Al-Qaeda's mission was and is?
 23 A. I know.
 24 Q. Can you tell me your understanding?

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1 A. What I know, and this is through my knowing
 2 that -- the Qaeda organization, or Al-Qaeda,
 3 there was a long period where -- within which
 4 the Al-Qaeda organization had changed. That
 5 changed was -- that change was from one idea
 6 to another idea. The Al-Qaeda organization,
 7 up till the events of September, were adopting
 8 some ideas that differed after September.
 9 Before September, Al-Qaeda was a
 10 group that was supporting resistance, the
 11 resistance movement. For example, in
 12 Afghanistan, against the Russians, and the
 13 resistance, as well, that happened by the
 14 Chechens against the Russians, the Turkishstan
 15 (sic), Turkishstan against the Russians, as
 16 well, and the Al-Qaeda group was supporting
 17 the Army or the Sudanese government against
 18 the separatists in the southern Sudan.
 19 Q. Let me make sure I understand, Mr. Soud. Are
 20 you saying that Al-Qaeda, to your
 21 understanding, was supporting the Afghanis
 22 against the Russians prior to 9-11?
 23 A. Yes.
 24 Q. And the --

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1 MR. ALHALABI: I'm sorry. I'm
 2 sorry. Your question was prior to 9-11. The
 3 translation was prior to 2011.
 4 MR. SMITH: Okay. So let's correct
 5 that, then.
 6 INTERPRETER: September 11.
 7 Correction for the record, the interpreter
 8 would like to add before September 11.
 9 MR. SMITH: The same answer?
 10 INTERPRETER: I'm sorry. I didn't
 11 catch the -- the interpreter did not catch the
 12 question.
 13 MR. SMITH: Let's have the question
 14 read back.
 15 (Whereupon, the record was read
 16 back by the court reporter as
 17 follows:
 18 QUESTION: "Let me make sure I
 19 understand, Mr. Soud. Are you
 20 saying that Al-Qaeda, to your
 21 understanding, was supporting the
 22 Afghanis against the Russians prior
 23 to 9-11?
 24 "ANSWER: Yes.")

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1 BY MR. SMITH:
 2 Q. Is that your answer?
 3 (Translation.)
 4 INTERPRETER: 2011, right? 9/11.
 5 MR. ALHALABI: 9/11 is not 2011.
 6 9/11 is 2001.
 7 INTERPRETER: Oh.
 8 (Translation.)
 9 THE WITNESS: What I know is that
 10 the Afghani resistance, it was supported by
 11 Al-Qaeda in its war against Russia.
 12 BY MR. SMITH:
 13 Q. So, when you were fighting in the '90s with
 14 the LIFG, Al-Qaeda was fighting on the same
 15 side against the Russians, is that right?
 16 A. I have fought against the Russians, that was
 17 in 1991 and 1992, and that was supported by
 18 the American government. The American
 19 government was supporting the resistance over
 20 there in a direct manner, and politically,
 21 literally, and was supplying the resistance,
 22 the Afghani resistance, with weapons,
 23 necessary weapons, to carry that fight. I did
 24 not participate in combat against any other

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1 groups except only three times.
 2 MS. SHAMSI: Maybe we should take a
 3 break because I think everybody's getting
 4 tired, but I'm happy for you to go longer if
 5 you want.
 6 MR. SMITH: Let me just ask a couple
 7 follow-up questions, then we'll take a break.
 8 BY MR. SMITH:
 9 Q. Who is Brock Chisholm?
 10 INTERPRETER: Brock Chisholm?
 11 MR. SMITH: Yes.
 12 (Translation.)
 13 A. I don't know.
 14 Q. Did you ever tell Brock Chisholm that you were
 15 involved in 20 to 30 fire fights while in
 16 Afghanistan?
 17 MS. SHAMSI: Sorry to interrupt, but
 18 I think accents are getting in the way of
 19 communication here. So I think, why don't you
 20 just start off, if you don't mind, by asking
 21 who Brock Chisholm is, Dr. Brock Chisholm.
 22 MR. SMITH: I think I already asked
 23 that question.
 24 MS. SHAMSI: But I think that the

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1 accent was misunderstood, the --
 2 INTERPRETER: Chisholm.
 3 MS. SHAMSI: The way that the name
 4 is pronounced didn't come across.
 5 MR. SMITH: Well, I'm happy to have
 6 you repeat it again.
 7 INTERPRETER: Sure.
 8 (Translation.)
 9 THE WITNESS: I did not participate
 10 20 or 30 times, did not.
 11 BY MR. SMITH:
 12 Q. Does the name Brock Chisholm mean anything to
 13 you?
 14 A. Dr. Brock Chisholm, I met him in Turkey and I
 15 talked with him about my psychological
 16 condition. I only dealt with Dr. Brock, I
 17 only knew his first name, and I dealt with
 18 him, but the last name or the second name, I
 19 did not recognize. I didn't know.
 20 MR. SMITH: All right. So why don't
 21 we take a break, give your hands a rest.
 22 VIDEOGRAPHER: The time is 3:06.
 23 MR. SMITH: Give your voice a rest.
 24 VIDEOGRAPHER: We're off the record.

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1 (Brief pause.)
 2 VIDEOGRAPHER: Back on the record.
 3 The time is 3:24.
 4 BY MR. SMITH:
 5 Q. Mr. Soud, are you able to go forward?
 6 A. Yes.
 7 Q. Mr. Soud, when did you learn that one of
 8 Al-Qaeda's missions was to cause harm to the
 9 citizens of the United States of America?
 10 A. From the events of September.
 11 Q. So you're saying that you had no
 12 understanding, prior to September 11th, 2001,
 13 that Al-Qaeda had intentions to harm citizens
 14 of the United States of America, is that your
 15 testimony?
 16 A. I did not realize that Al-Qaeda had adopted
 17 the work against the USA in a particular way
 18 but after the events of 9-11.
 19 Q. So we're clear, Mr. Soud, I'm not asking you
 20 if you had knowledge about what the intention
 21 was on September 11th, 2001. I'll stop there
 22 and let you translate.
 23 (Translation.)
 24 Q. What I am asking you is when did you learn

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1 that the members of Al-Qaeda had an intention
 2 to cause harm to citizens of the United States
 3 of America, when did you learn that?
 4 A. I did not know when Al-Qaeda had thought about
 5 and guessed when it was to attack the United
 6 -- the USA.
 7 Q. I appreciate that, but I'm asking you a more
 8 fundamental question. When did you learn that
 9 the members of Al-Qaeda intended to cause harm
 10 to citizens of the United States of America?
 11 MS. SHAMSI: Objection.
 12 (Translation.)
 13 MS. SHAMSI: What did you ask of
 14 him?
 15 INTERPRETER: Can we proceed?
 16 MS. SHAMSI: Yes.
 17 INTERPRETER: Or objection and --
 18 MS. SHAMSI: I just said objection.
 19 INTERPRETER: Okay.
 20 (Translation.)
 21 THE WITNESS: I cannot say anything
 22 about something that is just mere guessing,
 23 but what I knew is that Al-Qaeda, when aimed
 24 at American targets in 1998, it wanted the

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1 war, it wanted the war with the USA.
 2 BY MR. SMITH:
 3 Q. When you occasionally met with Mr. Abu Faraj
 4 al-Libi at what you referred to as "the house
 5 of receiving guests," were you aware that he
 6 had the intention to harm Americans?
 7 A. What I know is that Abu Al-Faraj is a member
 8 of Al-Qaeda and that Al-Qaeda has a different
 9 -- a doctrine that is different from ours,
 10 from the LGIF (sic).
 11 Q. Mr. Soud, when you --
 12 A. LFIG (sic).
 13 Q. When you met at the house of receiving guests
 14 with Abu Faraj al-Libi, were you aware that
 15 he, as a member of Al-Qaeda, intended to cause
 16 harm to United States citizens? Were you
 17 aware of that?
 18 MS. SHAMSI: Objection.
 19 THE WITNESS: I didn't know that
 20 America was going to be targeted. I didn't
 21 know. I did not know.
 22 BY MR. SMITH:
 23 Q. I understand that. I'm asking you a different
 24 question. Were you aware that Al-Qaeda --

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1 well, let me start all over again. Strike
 2 that.
 3 Were you aware that Abu Faraj
 4 al-Libi, a member of Al-Qaeda, intended to
 5 cause harm to citizens of the United States,
 6 even though you didn't know what the harm was,
 7 were you aware of that?
 8 MS. SHAMSI: Objection. You may
 9 answer.
 10 THE WITNESS: What I know is that he
 11 belongs to Al-Qaeda and that Al-Qaeda had the
 12 intention to target America.
 13 BY MR. SMITH:
 14 Q. Now, did you think that as a compatriot Libyan
 15 citizen that you needed to protect that secret
 16 with Mr. Abu Faraj al-Libi?
 17 MS. SHAMSI: Objection.
 18 THE WITNESS: No.
 19 BY MR. SMITH:
 20 Q. Did you ever tell any Americans about your
 21 knowledge of Abu Faraj al-Libi?
 22 A. No.
 23 Q. Were you asked? Were you asked by Americans
 24 about your knowledge?

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1 A. Yes. I was asked by the CIA about Abu Faraj.
 2 Q. What did you tell them?
 3 A. What I have just said. What I have just said,
 4 that we don't have any affiliation with him
 5 except that he is a Libyan national and we are
 6 -- we belong to the Islamic fraternity. This
 7 is all I know.
 8 Q. Did you tell Americans that you and he would
 9 visit together at the house of receiving
 10 guests that you told me about earlier today?
 11 Did you tell the Americans that?
 12 A. Yes. I told that I have met him, yes.
 13 Q. Did you tell the Americans where you met him?
 14 A. At that visiting house.
 15 Q. So your testimony is that you told Americans
 16 about the visits that were made to the house
 17 of receiving guests, is that correct?
 18 MS. SHAMSI: Objection. You may
 19 answer.
 20 THE WITNESS: Yes.
 21 BY MR. SMITH:
 22 Q. Mr. Soud, do you know a person by the name of
 23 Abu Layth, that's L-A-Y-T-H, al-Libi
 24 (al-Libee) or Libi (Libuy)?

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<p>1 Who is he? 2 A. Yes. 3 Yes, he was a person -- yes, he was 4 a member, one of the members of the LIFG. 5 MR. ALHALABI: Yes, he was a Libyan 6 person. 7 INTERPRETER: Yes, he was a Libyan 8 person. 9 BY MR. SMITH: 10 Q. Okay. Was Abu Layth al-Libi a member of 11 Al-Qaeda? 12 A. Yes. He was one of the group, one member of 13 the group LIFG, then after the war, after 14 Afghanistan was invaded by America, the war of 15 America in Afghanistan, he became a member for 16 Al-Qaeda. 17 MR. ALHALABI: He didn't say 18 "member." He said he started working with 19 Al-Qaeda. 20 MR. SMITH: Excuse me for one 21 second. I'm happy to have you assist in the 22 translation, but let me just remind you, 23 you're not an advocate here today. 24 MR. ALHALABI: I'm not. I'm just --</p>	<p>1 THE INTERPRETER: Sure. 2 MR. SMITH: Yeah. Because I know 3 you're doing your best, and I know you are, 4 and let's just make a record that looks that 5 way. 6 INTERPRETER: Yes, please. 7 MR. SMITH: Okay. So what's the 8 issue? 9 INTERPRETER: Could the interpreter 10 clarify from the witness the last segment 11 concerning Abu Layth al-Libi? 12 (Translation.) 13 INTERPRETER: Exactly. He was 14 correct. He became cooperative or cooperating 15 with Al-Qaeda. 16 BY MR. SMITH: 17 Q. In what year did that occur? 18 A. After September in 2001. 19 Q. Okay. How many other members of the LIFG 20 started cooperating with Al-Qaeda after 21 September 11th, 2001? 22 A. Some members have become cooperating -- 23 started cooperating with Al-Qaeda, I would say 24 about four persons, that those have become</p>
<p>Page 115</p> <p>1 MR. SMITH: Okay. 2 MR. ALHALABI: I'm just saying -- 3 MR. SMITH: I understand. 4 MR. ALHALABI: -- exactly what he 5 said. 6 MR. SMITH: No, I understand. But, 7 obviously, there is a dispute about what he 8 said. And I don't know what he said and I 9 want to make sure we get a hundred percent 10 right, but let's just make sure that we do it 11 in a way that -- 12 MS. SHAMSI: Jim, I totally agree 13 with you that he's not speaking as an 14 advocate. 15 MR. SMITH: Yeah. 16 MS. SHAMSI: As a translator, if 17 there is an issue with -- 18 MR. SMITH: Absolutely. 19 MS. SHAMSI: -- respect to "member" 20 versus "working with," then that's something 21 that you might want to clarify. 22 INTERPRETER: Sure. 23 MR. SMITH: And if there is an 24 issue, let's just do it in a way that --</p>	<p>Page 117</p> <p>1 cooperating with Al-Qaeda. This is what I 2 know. 3 Q. And do you know their names? 4 A. Yes. 5 Q. What are their names? 6 A. There is Seraj, S-E-R-A-J, Abu Sahl, A-B-U, 7 S-A-H-L, Abdulla Saaid, A-B-D-U-L-A (sic), 8 S-A-A-I-D. This is what I remember right now. 9 Q. I thought you said there were four. 10 A. Yes, but I forgot the fourth. 11 Q. And when did you learn that these members of 12 LIFG were cooperating with Al-Qaeda? 13 A. In 2002. 14 Q. And in 2002, I think you were back in 15 Pakistan, right? 16 A. Yes. 17 Q. And how did you learn about these four and 18 their cooperation? 19 A. We were in Peshawar and I -- it came to my 20 knowledge that there are persons from LIFG, 21 that Abu Layth managed to convince them with 22 his goals and his desire to help Al-Qaeda, 23 that's -- and, thus, they joined him. 24 Q. Now, do you know if these people from LIFG</p>

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<p>1 were on the payroll for LIFG, like you were? 2 MS. SHAMSI: Objection. You can 3 answer. 4 THE WITNESS: I don't know. 5 BY MR. SMITH: 6 Q. Well, do you have any reason to believe they 7 were treated any differently than you? 8 A. Repeat the question. 9 Q. Do you have any reason to believe they were 10 treated any differently by the LIFG than you 11 were treated by the LIFG? 12 MS. SHAMSI: Objection. 13 THE WITNESS: I don't know. I don't 14 know. 15 BY MR. SMITH: 16 Q. Do you know what the cooperation was that 17 these men were giving to Al-Qaeda? 18 A. I don't know. 19 Q. Did you ever learn, sir, after September 11th, 20 2001, that there was another attack that was 21 planned on the United States? 22 A. I don't know. 23 Q. What was your reaction when you learned about 24 the attack on the United States on</p>	<p>1 A. I did not know that he had joined Al-Qaeda. I 2 know that he has joined. 3 Q. Well, you knew he was cooperating following 4 the events of September 11th, 2001, with 5 Al-Qaeda, correct? 6 A. Yes. 7 Q. Who is Abu al-Laith (sic), L-A-I-T-H, al-Libi, 8 L-I-B-Y (sic)? 9 MS. SHAMSI: Objection. Asked and 10 answered, but you can answer. 11 BY MR. SMITH: 12 Q. Abu Laith, is that the same person? 13 A. Yes. 14 Q. Are you still a member of the LIFG? 15 A. Yes. The LIFG has turned into a political 16 party after the killing of Gaddafi in 2011. 17 Q. Is it true that on November 3rd, 2007, the 18 LIFG merged with Al-Qaeda? 19 A. It's not true, no. 20 Q. Have you seen the video clips produced by 21 Al-Qaeda announcing that merger? 22 A. I saw Abdelhakim Belhadj when we were together 23 in the prison in Libya and he was confirming 24 that he did not join Al-Qaeda.</p>
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<p>1 September 11th, 2001? 2 A. I opposed, I opposed that vehemently, or 3 strongly. 4 Q. And when you learned that the LIFG members who 5 you've identified by name were participating 6 with or cooperating with Al-Qaeda, did you 7 report them to the authorities? 8 A. No. 9 Q. Is that because they were Libyan brothers? 10 MS. SHAMSI: Objection. You may 11 answer. 12 THE WITNESS: I did not have the 13 clear means or the methods to say about or to 14 tell about these and I did not know any 15 American to tell them that these are who did 16 that or -- or tell them about those, tell them 17 about those. 18 BY MR. SMITH: 19 Q. Do you know the name, Mr. Soud, Abu Yahya, 20 that's Y-A-H-Y-A, al-Libi, L-I-V-Y (sic)? 21 A. I know -- I know it's the fourth person that I 22 missed. 23 Q. Okay. And isn't it true that he occupied a 24 senior position in Al-Qaeda?</p>	<p>1 MR. SMITH: Could you repeat the 2 question? 3 (Whereupon, the last question was 4 read back by the court reporter as 5 requested.) 6 MR. SMITH: I'm going to move to 7 strike the answer as nonresponsive. 8 BY MR. SMITH: 9 Q. Have you seen the video clips produced by 10 Al-Qaeda or released by Al-Qaeda announcing 11 the merger of Al-Qaeda and the LPIG? I'm 12 sorry, LIFG. I misspoke. 13 A. No, I did not see it. 14 Q. Have you heard about it? 15 A. No. I was not living in prison and I did not 16 hear about it. 17 Q. So, Mr. Soud, you were -- 18 MR. ALHALABI: The answer was, no, I 19 did not. I was living in prison and I did not 20 hear about it. 21 And that's not what he said. Sorry. 22 MR. SMITH: You good with that? Do 23 you accept that interpretation? 24 INTERPRETER: Yeah, I'm just</p>

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1 thinking if it's the same --
 2 MR. SMITH: Okay. Take your time.
 3 THE INTERPRETER: -- by rephrasing
 4 it, the wording. This is what the interpreter
 5 has said, that he did not hear about it, he
 6 was living in prison.
 7 MR. SMITH: We're good. Okay.
 8 BY MR. SMITH:
 9 Q. Mr. Soud, you were captured in April of 2003,
 10 is that right?
 11 A. Yes.
 12 Q. And you were detained for how long?
 13 MS. SHAMSI: Objection, but you may
 14 answer.
 15 THE WITNESS: For a period of a year
 16 and four months, I was detained. I was
 17 detained.
 18 BY MR. SMITH:
 19 Q. Okay. And the -- I think you were captured on
 20 April 3rd, 2002. Does that sound right?
 21 A. Yes, I was captured on April 3rd, 2003.
 22 Q. And you were held until August of 2003?
 23 A. I was detained till August of 2004.
 24 Q. 2004, okay.

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1 And when were you -- when in August?
 2 A. The 22nd of August of 2004.
 3 Q. All right. And on August 22nd, 2004, what
 4 happened to you?
 5 A. I was taken from the prison that I was in to
 6 the prison that I was in that was the CIA
 7 prison and I was dispatched to some unknown
 8 place, and when I arrived there, to that
 9 place, I was handed over to the Gaddafi
 10 regime.
 11 Q. So were you -- when you were handed over to
 12 the Gaddafi regime, were you in Libya?
 13 A. Yes. I mean Libya, I mean handing me over to
 14 Libya.
 15 Q. Were you actually handed over in Libya or some
 16 other country?
 17 A. I was in another country and, then, I was
 18 handed to Libya.
 19 Q. So you were turned over to Libyan officials
 20 but in another country?
 21 A. Directly, directly through the CIA and the
 22 Gaddafi regime in Libya.
 23 Q. Okay. So just so we're clear on the record,
 24 he was turned over to the Gaddafi regime in

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1 Libya?
 2 MS. SHAMSI: Objection, form.
 3 THE WITNESS: Yes, I was turned over
 4 directly to the Libyan government.
 5 BY MR. SMITH:
 6 Q. Now, at the time you were turned over to the
 7 Libyan government, was there a warrant
 8 outstanding for your arrest?
 9 A. No. There wasn't a warrant for my arrest
 10 because the Gaddafi regime does not need a
 11 warrant to arrest me.
 12 THE INTERPRETER: And just an
 13 addition, the interpreter would add: Because
 14 of me being a member of IL -- LIFG, there was
 15 no need for a warrant to arrest.
 16 MR. SMITH: Okay.
 17 MS. SHAMSI: Can I just ask for a
 18 clarification on the record?
 19 MR. SMITH: Sure.
 20 MS. SHAMSI: When the interpreter
 21 said "the interpreter would add," is that the
 22 interpreter's addition or --
 23 INTERPRETER: No. Whatever he said.
 24 The interpreter just did not carry that

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1 "because I was a member of the LIFG" within
 2 that reply. It's his words.
 3 Maybe I -- maybe the interpreter
 4 shall say again.
 5 No, because of the Gaddafi regime,
 6 and I were a member of LIFG, there was no need
 7 for a warrant to arrest me.
 8 MR. SMITH: Are you good with that,
 9 Bashar?
 10 MR. ALHALABI: Good enough.
 11 BY MR. SMITH:
 12 Q. Mr. Soud, at the time you were turned over to
 13 the Libyan government, was it still your
 14 intention to kill Gaddafi and the members of
 15 his regime?
 16 A. Definitely, yes.
 17 Q. And how long -- you were -- strike that.
 18 When you were turned over to the
 19 Libyan government, you were in prison?
 20 A. Yes.
 21 Q. And how long did you remain in prison?
 22 A. To the year 2011, till January of 2011.
 23 Q. When was Gaddafi killed in 2011, do you know?
 24 A. August 20, yes.