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16 UNITED STATES DISTRICT COURT
17 FOR THE EASTERN DISTRICT OF WASHINGTON
18 AT SPOKANE

19 SULEIMAN ABDULLAH SALIM,
20 MOHAMED AHMED BEN SOUD,
21 OBAID ULLAH (as personal
22 representative of GUL RAHMAN),

23 Plaintiffs,

24 vs.

25 JAMES ELMER MITCHELL and
JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-CV-286-JLQ

DECLARATION OF JOHN
"BRUCE" JESSEN IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

DECLARATION OF JOHN "BRUCE"
JESSEN IN SUPPORT OF DEFENDANTS' - 1 -
MOTION FOR SUMMARY JUDGMENT

1 I, John "Bruce" Jessen, hereby certify under penalty of perjury, that the
2 following is true and correct and within my personal knowledge:

3 1. I am over the age of 18, have personal knowledge of all facts
4 contained in this declaration, and am competent to testify as a witness to those
5 facts.

6 2. I am one of the Defendants in the above captioned case.

7 3. I was employed by the United States Department of Defense for over
8 20 years, ending in July 2002, when I resigned. On July 22, 2002, I became an
9 independent contractor for the United States Central Intelligence Agency ("CIA").
10

11 4. From April 2002 through January 2003, of the time I spent working
12 for the CIA, I spent 98% of my time deployed at locations outside the United
13 States.

14 5. Through my work as an independent contractor for the CIA, I
15 understood that Dr. James Mitchell and I were the sole individuals authorized to
16 apply Enhanced Interrogation Techniques ("EITs") up until November 2002 when
17 I first learned that the CIA was training interrogators in EIT application.

18 6. I visited the CIA's detention cite named COBALT only one time, in
19 November 2002.

20 7. Based on my presence at COBALT in November 2002 and my
21 personal knowledge of the events that occurred while I was there, I know that
22 "CIA Staff Officer" referenced in the Memorandum for the Deputy Director for
23 Operations re: Death Investigation – Gul Rahman (US Bates 001112-47) as the
24 "site manager" for COBALT was also COBALT's Chief of Base. This individual
25

DECLARATION OF JOHN "BRUCE"
JESSEN IN SUPPORT OF DEFENDANTS' - 2 -
MOTION FOR SUMMARY JUDGMENT

105725829_3/051917 1601/8360-0001Betts, Patterson & Mines, P.S.

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1 is also referenced as "CIA Staff Officer" in some portions of the CIA Inspector
2 General's Report of Investigation re: Death of a Detainee (US Bates 001267-334)
3 and the CIA Inspector General's Special Review of Counterterrorism Detention
4 and Interrogation Activities (US Bates 001335-1493).

5 8. I was not aware that the Director of the CIA's Guidelines on
6 Interrogations, a copy of which is attached here as Exhibit 1, was sent to
7 COBALT in January 2003.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the
9 laws of the United States that the foregoing is true and correct.

10 DATED this 19 day of May, 2017.

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14 John "Bruce" Jessen

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DECLARATION OF JOHN "BRUCE"
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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By s/ Shane Kangas
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DECLARATION OF JOHN "BRUCE"
 JESSEN IN SUPPORT OF DEFENDANTS' - 4 -
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