Exhibit 6

Page 1

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

	Page 6		Page 8
1	PROCEEDINGS	1	MR. ALHALABI: Yes, sir.
2	VIDEOGRAPHER: This is the video	2	MOHAMED AHMED MOHAMED BEN SOUD,
3	operator speaking, Bill Slater, of	3	a witness called for examination by counsel
4	TransPerfect Legal Solutions. Today's date is	4	for the Defendants, being first duly sworn,
5	January 31st, 2017. The time is approximately	5	was examined and testified as follows:
6	9:33 a.m.	6	EXAMINATION
7	We are here today at the Fort Young	7	BY MR. SMITH:
8	Hotel, on the island of Dominica, to take the	8	Q. Would you state your name for the record,
9	videotaped deposition of Mohamed Ahmed Ben	9	please.
10	Soud in the matter of Suleiman Abdullah Salim,	10	A. My name is Mohamed Ahmed Mohamed Ben Soud.
11	et al., versus James E. Mitchell and John	11	Q. Mr. Soud, my name is Jim Smith and I represent
12	Jessen, in the United States District Court,	12	the defendants in an action that's been
13	Eastern District of Washington, No.	13	brought in the United States of America in a
14	CV-15-0286-JLQ.	14	federal district court in the state of
15	Will counsel please voice identify	15	Washington.
16	yourselves and state whom you represent.	16	Are you aware that you're a
17	MR. SMITH: Jim Smith for the	17	plaintiff in that action, sir?
18	defendants.	18	A. Yes.
19	THE DEFENDANT: Charisse Alexander	19	Q. And you're aware that you're here to give a
20	for the defendants.	20	deposition today?
21	MS. SHAMSI: Hina Shamsi for the	21	A. Yes.
22	plaintiffs.	22	Q. Have you ever given a deposition before,
23	MR. WATT: Steven Watt for the	23	Mr. Soud?
24	plaintiffs.	24	A. Yes.
24	Page 7	21	Page 9
1			
1	MR. FREY: Avram Frey for the	1	Q. Can you tell me when?
2	plaintiffs.	2	MR. ALHALABI: That was not right.
3	VIDEOGRAPHER: The court reporter	3	INTERPRETER: No?
4	today is Jane Borrowman. She will swear in	4	MR. ALHALABI: No. It was no.
5	the witness and interpreter and we can	5	INTERPRETER: No. The interpreter,
6 7	proceed.	6	correction for the record, the witness said
	(Whereupon, NEVINE IBRAHIM was duly	7	no.
8	sworn to interpret the questions from English	8	BY MR. SMITH:
9	into Arabic, and the answers of the witness	9	Q. Have you ever testified before under oath?
10	from Arabic into English.)	10 11	A. No.
11 12	(Witness sworn.)		Q. Has anyone explained to you the significance
13	MS. SHAMSI: I just want to put on the record that we will also have here Bashar	12	of testifying under oath?
		13	A. Yes.
14	Alhalabi, who is an interpreter, and you and I	14	INTERPRETER: The interpreter was
15 16	have agreed that he can sit next to Mr. Ben	15	asking for raising his voice.
	Soud and if there are issues that arise with	16	Q. And do you understand that you have an
17	the interpretation, he will raise them.	17	obligation to testify completely and
18	MR. SMITH: Yes. Yes. We agreed to	18	truthfully?
19	that.	19	A. Yes.
20	What I would ask, sir, is if you	20	Q. And do you understand that there could be
21	will promptly raise them so we can sort them	21	penalties in the event that you do not?
22	out immediately so we have a complete record.	22	INTERPRETER: The interpreter added
23	MR. ALHALABI: Absolutely.	23	the sentence "where the penalty is to be
24	MR. SMITH: Fair enough?	24	administered if the testimony is not complete

	Page 22		Page 24
1	Dominica?	1	And I'll just say that I objected
2	A. I entered on the day 25th January.	2	and so there should be time for me to object
3	Q. What name did you use when you entered this	3	just as a but you may still answer.
4	country, sir?	4	BY MR. SMITH:
5	A. The official name my official name, Mohamed	5	Q. Mr. Soud, when did you start using the name
6	Ahmed Ben Soud.	6	Mohamed Ahmed Al-Zabandar?
7	Q. Mr. Soud, how did you come to be known as	7	A. I used it in 2000.
8	Abdul (sic) Kareem?	8	Q. And why did you start using that name in 2000?
9	A. I did not understand the question.	9	A. I used it to secure myself.
10	Q. Did there come a time when you started using	10	Q. And why was it necessary strike that.
11	the name Abdul Kareem?	11	Was this a false name?
12	A. Yes.	12	A. Yes.
13	Q. When?	13	Q. And why was it necessary to use a false name
14	A. At different times.	14	in 2000 to secure yourself?
15	Q. When did he first start using the name?	15	A. We, I, through my affiliation with LIFG and my
16	A. In 1995.	16	opposition to the unjust regime of Gaddafi in
17	Q. And why did he start using that name in 1995?	17	Libya, I had to do so to secure myself from
18	A. I used these names, and Abdel Kareem is one of	18	them from that regime following me.
19	them, to secure myself and to secure my	19	That, for me, meant a matter of life
20	movement through or during my affiliation with	20	or death. That meant a matter of freedom or
21	LFG (sic) and in fear of the chase of the	21	to be kept in an unjust regime of Gaddafi's
22	dictatorial Gaddafi regime for me.	22	prisons, that there is no human rights
23	MS. SHAMSI: Jim, just one more	23	connected with it, related to it or in it.
24	thing, I think the words were "LIFG," or the	24	Q. Mr. Soud, who was following you in 2000?
	Page 23		Page 25
1	letters were "LIFG."	1	A. The unjust dictatorial regime of Gaddafi.
2	MR. SMITH: Did you get the whole	2	Q. And why was Gaddafi following you in 2000, his
3	answer?	3	regime?
4	INTERPRETER: Yes.	4	A. Through my affiliation with LIFG.
5	MR. SMITH: Do we agree with LIFG?	5	Q. What about your affiliation with LIFG caused
6	INTERPRETER: Yes.	6	Gaddafi's regime to follow you?
7	MR. SMITH: Okay. Thank you.	7	A. It's a group that opposes the unjust regime of
8	BY MR. SMITH:	8	Gaddafi and resisting the Gaddafi regime and
9	Q. How did you get that name?	9	against injustice after the Gaddafi regime
10	A. Personal choice.	10	confiscated freedoms and ruptured human
11	Q. And did you have identification that actually	11	rights, kidnapping and torture, and trials
12	identified you by the name Abdul Kareem?	12	outside of the law frame, that was the reason
13	A. No.	13	for setting up the LIFG and was a reason for
14	Q. Do you have any official identification for	14	me to be affiliated with the LIFG, to
15	the person that you identified yourself on the	15	overthrow this unjust regime.
16	record as?	16	Q. Mr. Soud, when did you start using the name
17	MS. SHAMSI: Objection. You may	17	Mohamed Ahmed Al-Shareaia?
18 19	THE WITNESS: Yes.	18 19	A. This name, Al-Shareaia, I used since my
20	MS. SHAMSI: answer.	20	since I was young, and that was the name that my family had. My family was named
20 21	I just want it to be clear that I objected.	21	Al-Shareaia. And for family reasons that
22	MR. SMITH: Do you speak Arabic?	22	could that I can explain, I changed that
23	MS. SHAMSI: No, I don't. I was	23	name through the Libyan courts and already,
24	just it was just a formal objection.	24	and a judgment was issued in that regard.
4 1	just it was just a formal objection.		and a judgment was issued in that regard.

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. 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 anyone. 23 anyone. 24 Q. Did you actually put bullets into other 25 A. I don't know exactly. 26 Q. Did they shoot back? 27 A. I don't know exactly. 28 Q. Did they shoot back? 29 A. Yes. 20 Did they shoot back? 30 Q. Did they shoot back? 40 A. Yes. 41 LIFG; correct? 42 A. Yes. 43 Q. Did they shoot back? 44 A. Yes. 45 Q. Who, in 1992, you became affiliated with the LIFG, correct? 46 A. Yes. 47 A. Yes. 48 Q. Mad LIFG stands for Libyan Islamic Fighting Group, is that correct? 49 Q. When was that group formed? 40 A. Yes. 41 A. Itially, it was formed that group was formed in 1989. 41 A. Itially, it was formed that group was formed in 1989. 42 Q. Did you ever meet with Awad Azouwi; 43 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 20 Q. Did you ever meet with Awad Azouwi? 21 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 22 Q. Now, I want to move forward from 1992, the side of the LIFG? 24 A. I don't know exactly. 25 Q. Now, I want to move forward from 1992, the side of the LIFG? 26 A. It didn't come to my knowledge that I killed anyone. 27 A. Yes. 28 Page 43 29 Page 43 20 So vere you continuing to be in combat? 29 A. Yes. 20 Q. So during that period from 1992 through 1995, as a soldier for the LIFG? 20 A. Yes. 21 A. Through joining this group, and the Gaddafi regime had abolishing the constitution, and showing opposition, and considering that each one who would oppose the Gaddafi regime is a traitor who deserves to be killed within these circumstances, the group decided that its goal is the is opposition further your goals in 1992 through 1995; 29 MS. SHAMSI: Objection. You may answer. THE WITNESS: Resisting the Russian occupation, it		Page 42		Page 44
a was living within this group since my arrival to Pakistan and Afghanistan, but ny nitial— 4 my principal affiliation was in 1992. 5 Q. Okay. Now, in the period 1991 and 1992, were you involved in actual combat? 7 A. Yes. 8 Q. How many times? 9 A. Several times. 9 A. Several times. 10 Did you actually fire the AK-47? 11 A. Firing the Kalashnikov, I do not understand. 12 You mean— 12 You mean— 12 You mean— 13 Between 1992 and 1992, when you joined the LIFG, up until 2003, did you ever have a job? 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? 19 Q. Who did you shoot at? 20 A. To the enemy, to the Russian occupation. 21 Q. Did you actually put bullets into other 22 A. I didn't come to my knowledge that I killed anyone. 23 anyone. 24 Q. Did you actually put bullets into other 25 Q. Now, in 1992, you became affiliated with the LIFG, correct? A. Yes. 26 Q. And LIFG stands for Libyan Islamic Fighting Group; 17 A. Yes. The Islamic fighting group. 18 A. Yes. 19 Q. Who was that group formed? 10 A. Yes. The Islamic fighting group. 10 A. Yes. The Libyan Islamic Fighting Group; 11 Q. The Libyan Islamic Fighting Group; 12 A. Yes. 13 Q. Who was that group formed? 14 A. Initially, it was formed—that group was formed in 1989. 29 Q. Did you ever meet with Awad Azouwi. 20 Q. Did you ever meet with Awad Azouwi? 21 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 22 Q. Did you ever meet with Awad Azouwi? 23 Q. Did, wo, will anyone forward from 1992, the order arrested by the Pakistani govermment? 24 A. Yes. 25 A. Tothe comp, do the the time in 2003 when you were arrested by the Pakistani govermment? 26 A. Yes. 27 A. Yes. 28 A. Several times. 29 A. Yes. 29 A. Tothe comp, do the LiFG, under the LIFG, what were you trying to accomplish? 29 A. Yes. 30 Did you actually put bullets into other 31 A. Several times. 32 A. Tothe comp, do the time in 2003 when you will a priod from 1992 the four the LIFG or white LIFG what down, then. 34 A. Yes	1	A. That is because the LIFG is a Libyan group. I	1	you continue to be a member of the LIFG?
to Pakistan and Afghanistan, but my initial—my principal affiliation was in 1992. were you involved in actual combat? A. Yes. Q. How many times? A. Several times. Q. Did you actually fire the AK-47? A. Firing the Kalashnikov, I do not understand. You mean — Q. Did you shoot the gun? A. Yes. Q. Did you shoot the gun? A. Yes. 10 Q. Did you shoot the gun? 11 A. Firing the Kalashnikov, I do not understand. You mean — 12 Q. Okay. So let's break that down, then. 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. 18 A. Several times. 19 Q. Who did you shoot at? 20 A. To the enemy, to the Russian occupation. 21 Q. Did you known to my knowledge that I killed anyone. 22 A. I didn't come to my knowledge that I killed anyone. 23 Q. Did you actually put bullets into other Page 43 Page 45 A. Yes. Page 45 A. Yes. The Islamic fighting Group? A. Yes. The Islamic Fighting Group; A. Yes. The Islamic Fighting Group? A. Yes. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. The Islamic Fighting Group? A. Yes. The Islamic Fighting Group? A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. The Islamic Fighting Group? A. Yes. The Islamic Fighting Group? A. Yes. A. Through joining this group, and the Gaddafi regime had stopped political life and making it fall down through armed opposition, and considering that each one who would oppose the Gaddafi regime and making it fall down through armed				•
4 my principal affiliation was in 1992. 5 Q. Okay. Now, in the period 1991 and 1992, were you involved in actual combat? 6 A. Yes. 7 A. Yes. 8 Q. How many times? 9 A. Several times. 9 A. Several times. 10 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 the gun? 19 Q. Who did you shoot the gun? 10 A. To the enemy, to the Russian occupation. 10 Q. Did you actually put bullets into other 11 Q. Did you actually put bullets into other 12 A. I don't know exactly. 13 People's bodies? 14 A. Yes. 15 Q. Now, durant of mis group. 16 Q. The Libyan Islamic Fighting Group; 17 A. Yes. 18 Q. And LIFG stands for Libyan Islamic Fighting Group, is that correct? 19 Q. Who formed it? 20 A. The Libyan Islamic Fighting Group, is that correct? 21 A. I mass ext pby a person called Awad Azouwi; 22 A. I third to me to my knowledge that I killed and A. Yes. 23 Q. Who formed it? 24 A. I mix as tu pby a person called Awad Azouwi; 25 A. I was working with the military faction or part of this group. 26 A. Yes. 27 A. Yes. 28 Q. So were you continuing to be in combat? 28 A. I don't know exactly. 29 C. So during that period from 1992 through 1995, as a soldier for the LIFG, what were you trying to accomplish? Page 45 A. Through joining this group, and the Gaddafi regime had stopped political life and abolishing the constitution, and showing opposition as being demons, demonizing the opposition, and considering that acon ow who deserves to be killed within them in 2003 when you of position further your goals in 1992 through 1995. 28 Q. Who formed it? 29 Q. Who formed it? 20 Q. Did you ever meet with Awad Azouwi: 20 Q. Who formed it? 21 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 22 Q. Did you ever meet with Awad Azouwi: 23 Q. Who, W. I want to move forwalf from 1992, the control of Gaddafi? 29 Q. Who formed it? 20 Q. Did				
5 Q. Okay. Now, in the period 1991 and 1992, were 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? 10 Q. Did you kill anyone? 11 Jepseles bodies? 11 Peage 43 11 people's bodies? 12 A. I didn't come to my knowledge that I killed anyone. 22 A. I don't know exactly. 23 Q. Did you actually put bullets into other 24 Ves. The Islamic Fighting Group; 15 Q. Who, in 1992, you became affiliated with the LIFG; correct? 16 A. Yes. 17 Q. For win any times? 18 A. Several times. 19 Q. Who formed it? 20 A. To the enemy, to the Russian occupation. 21 Q. Did you actually put bullets into other 22 A. I don't know exactly. 23 Q. Did they shoot back? 4 A. Yes. The rewer confrontations, yes. 4 Q. Who, in 1992, you became affiliated with the LIFG; correct? 5 Q. Now, in 1992 what were you trying to accomplish? 10 Q. The Libyan 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 formed in 1989. 15 G. Q. Who, formed it? 16 Q. Who formed it? 17 A. It was set up by a person called Awad Azouwi? 18 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 19 Q. Who did you shad was a job, only it was a personal conviction. 19 Page 45 10 Page 45 11 A. Through joining this group, and the Gaddafir regime had stopped political life and adolishing the constitution, and showing opposition as being demons, demonizing the opposition as being demons, demonizing the opposition in the Libyan prison. 10 Q. Who formed it? 11 Q. The Libyan prison. 12 Q. Who formed it? 13 Q. When was that group formed? 14 A. Initially, it was formed — that group was formed in 1989. 15 G. Q. Who, Who formed it? 16 Q. W		•	1	
Solution		* * *	5	-
7 A. Yes. 8 Q. How many times? 9 A. Several times. 9 Q. Did you actually fire the AK-47? 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. 16 A. Yes. 16 A. Yes. 17 Q. How many times? 18 A. Several times. 19 Q. Who did you shoot at? 19 Q. Who did you shoot at? 20 A. To the enemy, to the Russian occupation. 21 Q. Did you skill anyone? 22 A. It didn't come to my knowledge that I killed anyone. 23 anyone. 24 Q. Did you actually put bullets into other 25 Q. Now, in 1992, you became affiliated with the LIFG, correct? 26 A. Yes. 27 A. Yes. 28 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 29 A. I times formed in 1989. 20 Q. Moy formed it? 21 A. Initially, it was formed - that group was formed in 1989. 21 A. Was set up by a person called Awad Azouwi; A. Was, A. Initially, it was formed - that group was formed in 1989. 22 Q. Did you ever meet with Awad Azouwi; A. Was, A. D. Azouwi, A-Z-O-U-Y or W-I. (Sic.) 23 Q. Now, I want to move forward from 1992, the			1	*
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. 16 A. Yes. 17 Q. How many times? 18 A. Several times. 19 Q. Who did you shoot at? 19 Q. Who did you shoot at? 20 A. To the enemy, to the Russian occupation. 21 Q. Did you skill anyone? 22 A. It didn't come to my knowledge that I killed anyone. 24 Q. Did you actually put bullets into other 25 Q. Did you actually put bullets into other 26 A. Yes. 27 A. Yes. 28 Q. And LIFG stands for Libyan Islamic Fighting Group, is that correct? 28 A. It didn't come to my knowledge that I killed abolishing the constitution, and showing opposition as being demons, demonizing the opposition, and considering that each one who would oppose the Gaddafi regime is a traitor who deserves to be killed within these circumstances, the group decided that its goal is the is opposition further your goals in 1992 through 1995. 28 Q. Who formed it? 29 A. Yes. 20 Q. Who formed it? 20 A. To standard frighting group. 21 A. It was set up by a person called Awad Azouwi? 22 A. It was set up by a person called Awad Azouwi; 23 Q. Who formed it? 24 A. It was set up by a person called Awad Azouwi; 25 A. Was, A. WA.D. Azouwi, AZO-U-Y or WI. (Sic.) 26 Q. Did you ever meet with Awad Azouwi; 27 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 28 Q. Now, I want to move forward from 1992, the		· · · · · · · · · · · · · · · · · · ·	7	Q. Now, during the period from 1992, when you
A Several times. Q Did you actually fire the AK-47? 10 Q. Did you shoot the gun? 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 anyone. 23 anyone. 24 Q. Did you actually put bullets into other 24 Page 43 1 people's bodies? 2 A. I don't know exactly. 3 Q. Did they shoot back? 4 A. Yes. 2 Q. Now, in 1992, you became affiliated with the LIFG, correct? 4 A. Yes. 3 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 4 A. Yes. 3 Q. When was that group formed? 4 A. Yes. 3 Q. When was that group formed? 4 A. Yes. 3 Q. When was that group formed? 4 A. Yes. 4 A. Yes. 5 Q. When was that group formed? 5 Q. Who formed in 1989. 5 Q. Who formed in 1989. 6 Q. Who formed ii? A. I was set up by a person called Awad Azouwi. 18 A. Was. Stland in the ease he was killed previously in the Libyan prison. 20 Q. Did you ever meet with Awad Azouwi? 21 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 22 A. I did not meet him because he was killed previously in the Libyan prison. 23 Q. Now, I want to move forward from 1992, the			8	
11 A. Firring 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 anyone. 23 anyone. 24 Q. Did you catually put bullets into other 25 A. I don't know exactly. 26 Q. Now, in 1992, you became affiliated with the LIFG, correct? 27 A. Yes. 28 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 29 A. Yes. There were confrontations, yes. 30 Q. Did they shoot back? 31 Q. Who did you shoot at? 32 A. Yes. There were confrontations, yes. 33 Q. Did they shoot back? 34 A. Yes. There were confrontations, yes. 35 Q. Now, in 1992, you became affiliated with the LIFG, correct? 36 Q. A. Yes. 37 A. Yes. 38 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 39 G. When was that group formed? 40 A. Yes. 41 A. Initially, it was formed that group was formed in 1989. 42 A. It was set up by a person called Awad Azouwi. 43 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 44 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 45 Q. Now, I want to move forward from 1992, the	9		9	
11 A. Firring 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 anyone. 23 anyone. 24 Q. Did you catually put bullets into other 25 A. I don't know exactly. 26 Q. Now, in 1992, you became affiliated with the LIFG, correct? 27 A. Yes. 28 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 29 A. Yes. There were confrontations, yes. 30 Q. Did they shoot back? 31 Q. Who did you shoot at? 32 A. Yes. There were confrontations, yes. 33 Q. Did they shoot back? 34 A. Yes. There were confrontations, yes. 35 Q. Now, in 1992, you became affiliated with the LIFG, correct? 36 Q. A. Yes. 37 A. Yes. 38 Q. And LIFG stands for Libyan Islamic Fighting Group; is that correct? 39 G. When was that group formed? 40 A. Yes. 41 A. Initially, it was formed that group was formed in 1989. 42 A. It was set up by a person called Awad Azouwi. 43 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 44 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 45 Q. Now, I want to move forward from 1992, the	10	Q. Did you actually fire the AK-47?	10	A. No. I did not have a job, only it was the
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. 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 anyone. 23 anyone. 24 Q. Did you actually put bullets into other 25 A. I don't know exactly. 26 Q. Did they shoot back? 27 A. Yes. 28 A. Yes. 29 Did they shoot back? 29 A. Yes. There were confrontations, yes. 20 Q. Did they shoot back? 21 Q. Did they shoot back? 22 A. Yes. 23 Q. Who, in 1992, you became affiliated with the LIFG, correct? 24 A. Yes. 25 Q. Who, in 1992, you became affiliated with the LIFG, correct? 26 Q. When was that group formed? 27 A. Yes. 28 Q. Who formed it? 29 Q. Who formed it? 20 Q. Did you ever meet with Awad Azouwi? 20 Q. Did you ever meet with Awad Azouwi? 21 A. No. No. I did not meet him because he was killed previously in the Libyan prison. 29 Q. Now, I want to move forward from 1992, the single firm the Libyan prison. 20 Q. Now, I want to move forward from 1992, the single firm the Libyan prison. 21 Q. Now, I want to move forward from 1992, the single working with the military faction or part of this group. 29 Q. So were you continuing to be in combat? 29 A. Yes. 29 Q. So were you continuing to be in combat? 29 Q. So were you continuing to be in combat? 29 Q. So you, essentially, were a soldier for the LIFG? 20 Q. So during that period from 1992 through 1995, as a soldier for the LIFG? 20 Q. So wore you continuing to be in combat? 20 Q. So wore you continuing to be in combat? 21 A. Yes. 22 So during that period from 1992 through 1995, as a soldier for the LIFG? 23 A. Through joining this group, and the Gaddafi regime had abolishing the constitution, and showing opposition, and considering that each one who would oppose the Gaddafi regime is a traitor who deserves to be killed within these circumstances, the group decided that its goal is the — is opposing the Gaddafi regime and making it	11	- •	11	
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, , , , , , , , , , , , , , , , , , ,	24	period 1992, so let's say through 2000, did	24	Q. I'm trying to understand why strike that.

	Page 94		Page 96
1	A. The whole period, I stayed in Kabul.	1	my wife who needed some medical attention
2	Q. Was it a year, a month?	2	because of pregnancy.
3	A. Months.	3	BY MR. SMITH:
4	Q. Okay. And then you left to go to where in	4	Q. Did you think that Pakistani officials were
5	Pakistan?	5	seeking to arrest you following the events of
6	A. I went to Karachi.	6	September 11th, 2001?
7	Q. And where did you stay in Karachi?	7	MS. SHAMSI: Objection.
8	A. Karachi is a vast place and I was going from	8	THE WITNESS: No.
9	one place to the other.	9	BY MR. SMITH:
10	Q. With your wife?	10	Q. Then, why were you jumping from place to
11	A. Yes.	11	place?
12	Q. And why were you going from one place to	12	A. To secure myself and for fear of a possible
13	another?	13	mistake.
14	A. There, my wife was expecting. There was my	14	Q. I see.
15	wife and I was expecting a baby. I needed to	15	Now, how long did you continue
16	move around, to move from one hospital to the	16	moving from place to place?
17	other. I was moving from one place to the	17	A. I stayed in Karachi till my wife delivered.
18	other and this is through the interest.	18	Q. When was that?
19	Q. Why were you moving from one place to another?	19	A. That was about in the seventh month of
20	A. Of course, after the events of September, the	20	2002.
21	security situation became very uptight in	21	Q. So that would be July of 2002?
22	Karachi and there was you know, there was,	22	A. Yes.
23	you know, a problem for the Arab the Arab	23	Q. And you left Karachi to go where?
24	person in Karachi, being there.	24	A. I left Karachi, went to Peshawar.
	Page 95		Page 97
1	Q. So you thought	1	Q. To Peshawar. To where?
2	A. I was obligated to protect myself and secure	2	A. Peshawar.
3	my wife and myself.	3	Q. And how long did you stay there?
4	Q. Mr. Soud, is it your testimony that after 9-11	4	A. Till I was detained or captured in 2003.
5	you thought that Pakistani authorities were	5	Q. Now, during the period well, strike that.
6	looking for you?	6	When were you detained in 2003?
7	MS. SHAMSI: Objection.	7	A. 3-4, 2003.
8	THE WITNESS: No, does not look for	8	Q. 3-4, so March?
9	me.	9	A. April.
10	BY MR. SMITH:	10	Q. April. Now, between the period July of 2002
11	Q. Well, why who did you think was pursuing	11	until April 2003, what did you do in Peshawar?
12	you in Pakistan after 9-11?	12	A. Repetition.
13	MS. SHAMSI: Objection.	13	MR. SMITH: Repeat it?
14	THE WITNESS: There was a huge	14	INTERPRETER: Want me to repeat?
15	security, like watch, on the watch, in	15	MR. SMITH: Sure.
16	Pakistan, and Pakistan was targeting any Arab,	16	(Translation.)
17	any Arab person who would be there in	17	THE WITNESS: I went to Peshawar
18	Pakistan.	18	because there was the remaining members of the
19	BY MR. SMITH:	19	LIFG, they were in Peshawar, and I was
20	Q. Well, why did you leave Afghanistan to go to	20	thinking with them about the way to get out of
21	Pakistan knowing that?	21	Pakistan.
22	MS. SHAMSI: Objection.	22	BY MR. SMITH:
23	THE WITNESS: I left Afghanistan to	23	Q. Who supported you during that period of time?
24	go to Pakistan because of the circumstances of	24	A. It was the LIFG.

	Dama 00		Page 100
	Page 98		Page 100
1	Q. And how did they go about supporting you, did	1	facilitating or the way that I can leave
2	they give you cash?	2	Pakistan and travel.
3	A. Yes.	3	Q. And where did you want to go if you could get
4	Q. Who gave you the cash?	4	out of Pakistan?
5	A. Khalid al-Sharif.	5	A. I was thinking of going to Iran.
6	Q. Spell that, please.	6	Q. Okay. And what did you intend to do in Iran?
7	A. K-A-H-A-L-E-D. A-L-S-H-A-R-E-E-F. (Sic.)	7	A. Only to secure myself. And the group, LIFG,
8	Q. And how much cash were you given by Sharif on	8	asked me to do so.
9 10	a monthly basis? A. He took over the rent for the house and the	9	Q. So did you intend to go to Iran to carry out
11		10 11	the causes of the LIFG? MS. SHAMSI. Objection. You may
12	monthly expenses. Q. How much cash would he give you on a monthly	12	MS. SHAMSI: Objection. You may
13	basis?	13	answer. THE WITNESS: My goal was to join
14	A. Four thousand rupee, about, nearly.	14	some of the member of the LIFG who are there
15	Q. And what did you do, if anything, in exchange	15	in Iran.
16	for this cash?	16	BY MR. SMITH:
17	A. I did not understand the question.	17	Q. To carry out their cause?
18	Q. So you were you were in Peshawar from July	18	A. To continue our cause against the Gaddafi
19	of '02 through April '03, correct?	19	regime.
20	A. Yes.	20	Q. Mr. Soud, do you know the name Abu Faraj,
21	Q. And the LIFG was paying all of your expenses	21	that's F-A-R-A-J, al-Libi, A-L hyphen L-I-B-I?
22	while you were there, correct?	22	A. Yes.
23	A. Yes.	23	Q. Who is that?
24	Q. What, if anything, did you do during that	24	A. He is a Libyan national.
	Page 99		Page 101
1	period of time for the LIFG?	1	Q. And how is it that you know him?
2	A. We were being paid the these amount sums	2	A. During my stay in Afghanistan.
3	of money and assistance not because of what we	3	Q. Was he part of the LIFG?
4	were offering the LIFG, it was because we were	4	A. No.
5	affiliated with the LIFG.	5	Q. Why did you why were you with him in
6	Q. Were you providing any services or assistance	6	Afghanistan?
7	to the LIFG during the period of time	7	A. I was not with him. I came to know him over
8	July 2002 through April 2003?	8	there, but I belonged to the LIFG and he
9	A. At that time, I talked with Khalid al-Sharif	9	belongs to Al-Qaeda.
10	that I was going to leave Pakistan. And at	10	Q. How did you come to meet him in Afghanistan?
11	that time, the conditions of the travel did	11	A. This is because Abu Faraj al-Libi is a Libyan
12	not allow that and, in particular, the	12	national and the LIFG is considered a Libyan
13	situation of the health situation of my	13	group. He used to frequent us from time to
14	wife did not allow for that. So the	14	time, this is because of the acquaintance and
15	circumstances were such that I didn't.	15	because he is a Libyan person.
16	Q. Were you in hiding?	16	Q. So he would frequent the camp in Afghanistan?
17	A. No.	17	MS. SHAMSI: Objection. You may
18	Q. Did you walk the streets freely in Peshawar?	18	answer.
19	A. Yes. O. And did you apply for any jobs?	19 20	THE WITNESS: No. He does not
20 21	Q. And did you apply for any jobs?A. No.	21	frequent the camp. BY MR. SMITH:
22	Q. Why not?	22	Q. Did he, during the period of time that you
23	A. I didn't want to do so. I was living in a	23	were at the camp in Afghanistan, did he
24	normally and I was waiting for the the	24	frequent that camp?

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1	A. No.	1	A. What I know, and this is through my knowing
2	Q. Was he ever at the camp?	2	that the Qaeda organization, or Al-Qaeda,
3	A. No, he did not visit the camp.	3	there was a long period where within which
4	Q. Well, where did you meet him in Afghanistan?	4	the Al-Qaeda organization had changed. That
5	A. We have a gathering place that we call the	5	changed was that change was from one idea
6	house of receiving guests or visiting guests	6	to another idea. The Al-Qaeda organization,
7	and this is a place for the LIFG and it is	7	up till the events of September, were adopting
8	situated within the city, it's a house, a	8	some ideas that differed after September.
9	rented house, that is occupied by people from	9	Before September, Al-Qaeda was a
10	the LIFG who are not in the camp.	10	group that was supporting resistance, the
11	Q. What city?	11	resistance movement. For example, in
12	A. Jalalabad.	12	Afghanistan, against the Russians, and the
13	Q. And why did Abu Faraj al-Libi have occasion to	13	resistance, as well, that happened by the
14	visit that house?	14	Chechens against the Russians, the Turkishstan
15	A. There was no reason. It was a visit. It was	15	(sic), Turkishstan against the Russians, as
16	like haphazard chance for him to visit.	16	well, and the Al-Qaeda group was supporting
17	Q. And you knew that he was part of the group	17	the Army or the Sudanese government against
18	Al-Qaeda?	18	the separatists in the southern Sudan.
19	A. Yes.	19	Q. Let me make sure I understand, Mr. Soud. Are
20	Q. And he was a welcome guest?	20	you saying that Al-Qaeda, to your
21	A. We are under the umbrella of the Libyan	21	understanding, was supporting the Afghanis
22	nationals and he would be welcome as a Libyan	22	against the Russians prior to 9-11?
23	national. And we oppose his we oppose his	23	A. Yes.
24	attitude, that when it comes to Al-Qaeda, we	24	Q. And the
	Page 103		Page 105
1	have a vast difference when it comes to their	1	MR. ALHALABI: I'm sorry. I'm
2	vision and the ideology, but still, we are	2	sorry. Your question was prior to 9-11. The
3	under the Islamic fraternity, umbrella, and	3	translation was prior to 2011.
4	between us, that bond of being of being	4	MR. SMITH: Okay. So let's correct
5	Libyans.	5	that, then.
6	Q. When did you learn that Abu Faraj al-Libi was	6	INTERPRETER: September 11.
7	affiliated with Al-Qaeda?	7	Correction for the record, the interpreter
8	A. About 1992.	8	would like to add before September 11.
9	Q. And how did you demonstrate to him that you	9	MR. SMITH: The same answer?
10	opposed his attitude toward the mission of	10	INTERPRETER: I'm sorry. I didn't
11	Al-Qaeda?	11	catch the the interpreter did not catch the
12	A. I would tell him you are Libyan, you are a	12	question.
13	Libyan national, and you have got out of Libya	13	MR. SMITH: Let's have the question
14	and you have left that Gaddafi regime that	14	read back.
15	would disregards the human rights and that	15	(Whereupon, the record was read
16	would kill, detain, and would confiscate the	16	back by the court reporter as
17	civil liberties, why don't you think about the	17	follows:
18	way to change that. You are a Libyan and a	18	QUESTION: "Let me make sure I
19	special responsibility or emphasis befalls on	19	understand, Mr. Soud. Are you
20	you to change this situation.	20	saying that Al-Qaeda, to your
21	Q. Mr. Soud, do you have an understanding of what	21	understanding, was supporting the
22	Al-Qaeda's mission was and is?	22	Afghanis against the Russians prior
~ ~		(') ')	40 11 117
23 24	A. I know.Q. Can you tell me your understanding?	23 24	to 9-11? "ANSWER: Yes.")

	Page 114		Page 116
1	Who is he?	1	THE INTERPRETER: Sure.
2	A. Yes.	2	MR. SMITH: Yeah. Because I know
3	Yes, he was a person yes, he was	3	you're doing your best, and I know you are,
4	a member, one of the members of the LIFG.	4	and let's just make a record that looks that
5	MR. ALHALABI: Yes, he was a Libyan	5	way.
6	person.	6	INTERPRETER: Yes, please.
7	INTERPRETER: Yes, he was a Libyan	7	MR. SMITH: Okay. So what's the
8	person.	8	issue?
9	BY MR. SMITH:	9	INTERPRETER: Could the interpreter
10	Q. Okay. Was Abu Layth al-Libi a member of	10	clarify from the witness the last segment
11	Al-Qaeda?	11	concerning Abu Layth al-Libi?
12	A. Yes. He was one of the group, one member of	12	(Translation.)
13	the group LIFG, then after the war, after	13	INTERPRETER: Exactly. He was
14	Afghanistan was invaded by America, the war of	14	correct. He became cooperative or cooperating
15	America in Afghanistan, he became a member for	15	with Al-Qaeda.
16	Al-Qaeda.	16	BY MR. SMITH:
17	MR. ALHALABI: He didn't say	17	Q. In what year did that occur?
18	"member." He said he started working with	18	A. After September in 2001.
19	Al-Qaeda.	19	Q. Okay. How many other members of the LIFG
20	MR. SMITH: Excuse me for one	20	started cooperating with Al-Qaeda after
21	second. I'm happy to have you assist in the	21	September 11th, 2001?
22	translation, but let me just remind you,	22	A. Some members have become cooperating
23	you're not an advocate here today.	23	started cooperating with Al-Qaeda, I would say
24	MR. ALHALABI: I'm not. I'm just	24	about four persons, that those have become
	Page 115		Page 117
1	MR. SMITH: Okay.	1	cooperating with Al-Qaeda. This is what I
2	MR. ALHALABI: I'm just saying	2	know.
3	MR. SMITH: I understand.	3	Q. And do you know their names?
4	MR. ALHALABI: exactly what he	4	A. Yes.
5	said.	5	Q. What are their names?
6	MR. SMITH: No, I understand. But,	6	A. There is Seraj, S-E-R-A-J, Abu Sahl, A-B-U,
7	obviously, there is a dispute about what he	7	S-A-H-L, Abdulla Saaid, A-B-D-U-L-A (sic),
8	said. And I don't know what he said and I	8	S-A-A-I-D. This is what I remember right now.
9	want to make sure we get a hundred percent	9	Q. I thought you said there were four.
10	right, but let's just make sure that we do it	10	A. Yes, but I forgot the fourth.
11	in a way that	11	Q. And when did you learn that these members of
12	MS. SHAMSI: Jim, I totally agree	12	LIFG were cooperating with Al-Qaeda?
13	with you that he's not speaking as an	13	A. In 2002.
14	advocate.	14	Q. And in 2002, I think you were back in
15	MR. SMITH: Yeah.	15	Pakistan, right?
16	MS. SHAMSI: As a translator, if	16	A. Yes.
17	there is an issue with	17	Q. And how did you learn about these four and
18	MR. SMITH: Absolutely.	18	their cooperation?
19	MS. SHAMSI: respect to "member"	19	A. We were in Peshawar and I it came to my
20	versus "working with," then that's something	20	knowledge that there are persons from LIFG,
21	that you might want to clarify.	21	that Abu Layth managed to convince them with
22	INTERPRETER: Sure.	22	his goals and his desire to help Al-Qaeda,
23	MR. SMITH: And if there is an	23	that's and, thus, they joined him.
24	issue, let's just do it in a way that	24	Q. Now, do you know if these people from LIFG
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	Page 122		Page 124
1	thinking if it's the same	1	Libya?
2	MR. SMITH: Okay. Take your time.	2	MS. SHAMSI: Objection, form.
3	THE INTERPRETER: by rephrasing	3	THE WITNESS: Yes, I was turned over
4	it, the wording. This is what the interpreter	4	directly to the Libyan government.
5	has said, that he did not hear about it, he	5	BY MR. SMITH:
6	was living in prison.	6	Q. Now, at the time you were turned over to the
7	MR. SMITH: We're good. Okay.	7	Libyan government, was there a warrant
8	BY MR. SMITH:	8	outstanding for your arrest?
9	Q. Mr. Soud, you were captured in April of 2003,	9	A. No. There wasn't a warrant for my arrest
10	is that right?	10	because the Gaddafi regime does not need a
11	A. Yes.	11	warrant to arrest me.
12	Q. And you were detained for how long?	12	THE INTERPRETER: And just an
13	MS. SHAMSI: Objection, but you may	13	addition, the interpreter would add: Because
14	answer.	14	of me being a member of IL LIFG, there was
15	THE WITNESS: For a period of a year	15	no need for a warrant to arrest.
16	and four months, I was detained. I was	16	MR. SMITH: Okay.
17	detained.	17	MS. SHAMSI: Can I just ask for a
18	BY MR. SMITH:	18	clarification on the record?
19	Q. Okay. And the I think you were captured on	19	MR. SMITH: Sure.
20	April 3rd, 2002. Does that sound right?	20	MS. SHAMSI: When the interpreter
21	A. Yes, I was captured on April 3rd, 2003.	21	said "the interpreter would add," is that the
22	Q. And you were held until August of 2003?	22	interpreter's addition or
23	A. I was detained till August of 2004.	23	INTERPRETER: No. Whatever he said.
24	Q. 2004, okay.	24	The interpreter just did not carry that
	Page 123		Page 125
1	And when were you when in August?	1	"because I was a member of the LIFG" within
2	A. The 22nd of August of 2004.	2	that reply. It's his words.
3	Q. All right. And on August 22nd, 2004, what	3	Maybe I maybe the interpreter
4	happened to you?	4	shall say again.
5	A. I was taken from the prison that I was in to	5	No, because of the Gaddafi regime,
6	the prison that I was in that was the CIA	6	and I were a member of LIFG, there was no need
7	prison and I was dispatched to some unknown	7	for a warrant to arrest me.
8	place, and when I arrived there, to that	8	MR. SMITH: Are you good with that,
9	place, I was handed over to the Gaddafi	9	Bashar?
10	regime.	10	MR. ALHALABI: Good enough.
11	Q. So were you when you were handed over to	11	BY MR. SMITH:
12	the Gaddafi regime, were you in Libya?	12	Q. Mr. Soud, at the time you were turned over to
13	A. Yes. I mean Libya, I mean handing me over to	13	the Libyan government, was it still your
14	Libya.	14	intention to kill Gaddafi and the members of
15	Q. Were you actually handed over in Libya or some	15	his regime?
16	other country?	16	A. Definitely, yes.
17	A. I was in another country and, then, I was	17	Q. And how long you were strike that.
18	handed to Libya.	18	When you were turned over to the
19	Q. So you were turned over to Libyan officials	19	Libyan government, you were in prison?
20	but in another country?	20	A. Yes.
21	A. Directly, directly through the CIA and the	21	Q. And how long did you remain in prison?
22	Gaddafi regime in Libya.	22	A. To the year 2011, till January of 2011.
23	Q. Okay. So just so we're clear on the record,	23	Q. When was Gaddafi killed in 2011, do you know?
24	he was turned over to the Gaddafi regime in	24	A. August 20, yes.

	Page 130		Page 132
1	were moving place to place?	1	Q. Who is Halid al-Sharif?
2	A. No.	2	A. He is one of the leaders of LIFG and he's a
3	Q. Where were your weapons?	3	Libyan.
4	A. I did not have a weapon.	4	Q. What were you doing with him?
5	Q. Where were they?	5	A. He came to visit.
6	A. I do not have a weapon.	6	Q. So describe for me, as best you can recall,
7	Q. No, but when you were at the camp, you had	7	the circumstances under which you were taken
8	weapons, right?	8	into custody.
9	A. Weapons do not belong to me. Weapons belong	9	A. I was with my family and my daughter in my
10	to LIFG.	10	house and some of some persons from the
11	Q. When you left Afghanistan to go to Karachi,	11	group. We were living in Peshawar. And at
12	did you take weapons with you?	12	that time, the raid happened on me.
13	A. No.	13	Q. Who were you with from the group?
14	Q. Why?	14	A. Khalid al-Sharif, Ayoub
15	A. I did not need.	15	Q. You gotta go a little slower. Go ahead.
16	Q. Why?	16	A. Ayoub.
17	A. I did not go to Karachi to fight with someone	17	Q. How do you spell that?
18	or to kill someone. I went for treatment.	18	A. A-Y-O-Ù-B, Majed, M-A-J-E-D, Lutfi,
19	Q. Okay. All right. Now, on April 3rd, 2002,	19	L-U-F-T-I L-U-T-F-I.
20	you were taken into custody, were you not?	20	Q. And were all of these members of the LIFG?
21	MS. SHAMSI: Objection. I think you	21	A. Yes.
22	want to check your date there.	22	Q. Were any of them assisting Al-Qaeda in any
23	MR. SMITH: What date is it? And he	23	way?
24	can say whatever the date is.	24	A. I do not know, no.
	Page 131		Page 133
1	Oh, I keep saying two. I don't know	1	Q. Do you know an individual named Khalid?
2	why I keep saying that. I'm confusing them.	2	A. Yes.
3	BY MR. SMITH:	3	Q. Who is Khalid?
4	Q. Let me just withdraw the question and say, on	4	A. Khalid al-Sharif.
5	April 3rd, 2003, Mr. Soud, you were taken into	5	Q. Okay. So it's not Haleed (phonetic), it's
6	custody, were you not?	6	Khalid?
7	A. Yes.	7	INTERPRETER: Khalid. Khalid.
8	Q. What time of day were you taken into custody?	8	MR. SMITH: Got it. Okay.
9	A. Noon-ish.	9	MS. SHAMSI: While there's no
10	Q. Noon-ish?	10	question pending, there's an issue with the
11	A. One o'clock, midday.	11	translation.
12	Q. What were you doing?	12	MR. ALHALABI: Yeah.
13	A. I was I were at home and with Khalid	13	MR. SMITH: Okay.
14	al-Sharif.	14	MR. ALHALABI: I gotta go back to
15	Q. I'm sorry. Can you repeat the witness's	15	the question, when you asked if any of the
16	answer?	16	members that were in the home or the house
17	A. I were at home and I was with Khalid	17	Or
18	al-Sharif.	18	MR. SMITH: Yes.
19	MR. SMITH: He was at home?	19	MR. ALHALABI: the place with
20	INTERPRETER: At home.	20	him, if he knew if they were any of them
21	MR. SMITH: Oh, okay. And he was	21	was a member of Al-Qaeda. The answer the
22	with?	22	correct answer was "I do not think so, no."
23 24	INTERPRETER: Khalid al-Sharif.	23	The translation was "I don't know, no." So I
144	BY MR. SMITH:	24	just

	Page 134		Page 136
1	MR. SMITH: Okay. Acceptable to	1	A. Yes.
2	you?	2	Q. Why would you run?
3	INTERPRETER: Yes.	3	A. I got scared about myself.
4	MR. SMITH: Okay. The record will	4	Q. Okay. What were you oh.
5	so reflect. Okay.	5	A. We have an enemy, Al-Gaddafi.
6	BY MR. SMITH:	6	Q. Do you think that by April of 2003 the Gaddafi
7	Q. So you were in your home with four other	7	regime knew that you were part of a group that
8	members of the LIFG when people appeared in a	8	wanted to kill him and and his regime?
9	raid, is that right?	9	MS. SHAMSI: Objection.
10	A. No.	10	THE WITNESS: Al-Gaddafi knew that
11	Q. Oh. How many people were in your home with	11	the LIFG wanted to kill him and that was all
12	you when this raid occurred?	12	the time, and this was the base of LIFG.
13	A. Only one person, that was Khalid al-Sharif,	13	BY MR. SMITH:
14	and my family.	14	Q. What was the basis for you to believe that the
15	Q. Okay. Tell me what happened.	15	Pakistani police were somehow aligned with
16	A. At the time of midday, I heard the sound or	16	Gaddafi and his regime at that time?
17	the noise of a pushing the door and a banging	17	MS. SHAMSI: Objection. You may
18	on the door, strongly. So I came out from the	18	answer.
19	window and I saw that the house was besieged	19	THE WITNESS: It happened previously
20	entirely and that the police cars were all	20	that the Pakistani police has captured Libyan
21	over the place, so I knew that the Pakistani	21	persons and handed them over to the Gaddafi
22	police has besieged the home and started to	22	regime.
23	break into it.	23	BY MR. SMITH:
24	Q. Did you lean out the window or jump out the	24	Q. So, when you jumped out the window, where did
	Page 135		Page 137
1	window?	1	you run to?
2	A. I leaned from the window so I have seen that	2	A. To the back street or back road or back alley.
3	scenery.	3	Q. And were there police back there, Pakistani
4	Q. And was that from the first floor or the	4	police?
5	second floor?	5	A. Yes. They were surrounding the place and shot
6	A. Second floor.	6	at me and I was hit in my foot.
7	Q. And what happened next?	7	Q. So you were shot by the Pakistani police
8	A. I realized that the Pakistani intelligence had	8	trying to flee?
9	besieged the home. Khalid al-Sharif jumped	9	A. Yes.
10	from the rear part to the house and me, too, I	10	Q. And was Sharif, was he being shot at, too?
11	joined him and jumped.	11	A. Yes.
12	Q. So you tried to escape?	12	Q. Was he hit?
13	A. Yes. I tried to flee.	13	A. Yes. He suffered a broken leg.
14	Q. Now, at that point, these were Pakistani	14	Q. And did the Pakistani police give you any
15	police who you believed were trying to take	15	warning before they started to shoot at you?
16	you, I guess to arrest you, was that your	16	A. No.
17	understanding?	17	Q. They didn't tell you to stop running?
18	MS. SHAMSI: Objection.	18	A. No. (In Arabic.)
19	THE WITNESS: Yes, (speaking	19	Q. Where were you going to go
20	Arabic).	20	MS. SHAMSI: I'm sorry. Just for
21	BY MR. SMITH:	21	the record, that wasn't translated, it was
22	Q. Now, do you remember you told me earlier today	22	still in Arabic.
23	that when you were living there, you would	23	MR. SMITH: Okay. You want to
24	walk the streets freely, without any concern?	24	translate it?

1 A. I learned later that this place is Islamabad. 2 Q. How long was the drive in the police car? 3 A. I don't know exactly, but more than an hour. 4 Q. Who was in the police car with you? 5 A. Khalid al-Sharif. 6 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the police car, too? 10 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 12 With an iron door. 13 Q. So you couldn't see how many other people were in the car? 14 A. Yes. 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? 18 to, is that correct? 19 A. Yes. 20 Q. And describe for me the place that you were 21 you were at that facility? 2 A. Yes. 3 A. I don't know exactly, but more than an hour. 3 Q. Do you remember how many Americans you communicated with? 5 A. Almost about three people. 6 Q. And were they different people than the person, the American, you had talked to at the Pakistani police station? 9 A. Yes. 10 Q. And were you interrogated by these three people? 11 A. Yes. 12 Q. By all three, or one, or two, or 13 Q. By all three, or one, or two, or 14 A. The three three of them were sitting down and one person was posing questions. 16 Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? 18 A. Yes. 20 Q. And describe for me the place that you were 20 Q. For how long each day?		Page 154		Page 156
2 Q. Now, during that period of time when you were held at the Pakistani police station, were you able to walk? 5 A. No. 6 Q. Were you able to stand? 7 A. On my own, no. 8 Q. And why is it that you were unable to walk? 9 A. My - my - my limb was broken and it was impossible to walk. 10 Q. Mat was broken? 11 Q. What was broken? 12 A. My foot. 13 Q. And that was from the rubber bullet? 14 A. Yes. 15 Q. And how long did you stay at the police station? 16 station? 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani police. 21 police car and I was transferred to another place. 22 Q. Who put the hood over your head? 3 A. The Pakistani police. 4 A. Yes. 15 Q. And how long did you stay at the police station? 16 A. Ten days. 17 Q. And how long did you remain there? 18 A. The Pakistani police. 21 Q. And what happened on the tenth day? 22 Q. Who shackled you? 23 A. The Pakistani police. 24 Q. How shackled vou? 25 A. Khalid al-Sharif. 6 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the police car, the back chamber of the car, the back chamber of the car, the back chamber of the car, think an iron door. 13 Q. So you couldn't see how many other people were in the car? 14 A. Yes. 15 Q. And were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know exactly where you were taken from – or taken to, is that correct? 18 A. Yes. 19 Q. And describe for me the place that you were 19 Q. And one presson was posing questions. 10 Q. Okay. And the time, you didn't know exactly where you were taken from – or taken to, is that correct? 10 Q. And describe for me the place that you were	1	question.	1	contained several solitary rooms.
held at the Pakistani police station, were you able to walk? A. No. Q. Were you able to stand? A. On my own, no. Q. And why is it that you were unable to walk? A. My my my limb was broken and it was in mostile to walk. Q. What was broken? A. My foot. Q. And that was from the rubber bullet? A. Yes. Q. And how long did you stay at the police station? A. Ten days. Q. And what happened on the tenth day? A. I was shackled. I was taken in a Pakistani police car and I was transferred to another place. Q. Who who was the hood put over your head? A. We were were you taken to? Page 155 A. Hearmed later that this place is Islamabad. Q. How long was the drive in the police car? A. I don't know exactly, but more than an hour. Q. Well, were there Pakistani police in the police car, ton? Q. So you couldn't see how many other people were in the car? A. Yes. Q. Okay. And, at the time, you didn't know it, is that correct? A. Yes. Q. Okay. And, at the time, you didn't know it, is that correct? A. Yes. Q. And describe for me the place that you were A. Yes. Q. Okay. And, then, so you arrived at this next place, in what you think is Islamabad, with a hood over your head? A. The Pakistani police. Q. And when was the hood put over your head? A. The Pakistani police. Q. And how long did you stay at the police as tation? Q. And how long did you stay at the police as tation? A. Yes. D. A. We were the pakistani police and the police car? A. I have the police car with you? A. We were detained at the back side of the car, the back chamber of the car, which was locked with a ninon door. A. We were detained at the back side of the car, the back chamber of the car, which was locked with a ninon door. A. We were detained at the back side of the car, the back chamber of the car, which was locked with a ninon door. A. Yes. C. And were the police as with you? A. The three- three of them were s		•	2	
4 A. I earned later that this place is Islamabad. 2 Q. And where were you taken to? 3 A. The Pakistani police. 4 A. I learned later that this place is Islamabad. 5 A. No. 6 Q. And where were you taken to? 7 A. On my own, no. 8 Q. And why is it that you were unable to walk? 9 A. My - my - my limb was broken and it was impossible to walk. 10 Q. Moth awas broken? 11 Q. Who that was froom the rubber bullet? 12 A. My foot. 13 Q. And that was from the rubber bullet? 14 A. Yes. 15 Q. And how long did you stay at the police station? 16 A. Ten days. 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani police car and I was transferred to another place. 20 Q. And where were you taken to? 21 Q. Who shackled you? 22 Q. Who shackled you? 23 A. The Pakistani police. 24 Q. And where were you taken to? 25 A. Khalid al-Sharif. 26 Q. Anyone else? 37 A. No. 38 Q. Well, were there Pakistani police in the police car, the back chamber of the car, which was locked in the car? 39 A. Yes. 40 Q. Say, And, at the time, you didn't know was due to walk? 41 A. The three the first prison. 42 Q. Mand whore was the hood put over your head? 43 A. The Pakistani police in the place in the police car with you? 44 Q. How long did you stay at the police ar? 45 A. One week, about. 46 A. Yes. 47 A. One week, about. 48 A. Yes. 48 A. Haenred later that this place is Islamabad. 49 Q. How long was the drive in the police car? 40 Q. How long was the drive in the police car? 41 A. Yes. 49 A. I don't know exactly, but more than an hour. 40 Q. Who was in the police car with you? 41 A. I don't know exactly, but more than an hour. 40 Q. Who was in the police car with you? 41 A. A. Kes. 41 A. Yes. 41 A. Yes. 42 Q. And where there Pakistani police in the police car, too? 41 A. I we were detained at the back side of the car, the back chamber of the car, which was locked in the car? 41 A. One week, about. 42 Q. Who was in the police car with you? 43 A. I don't know exactly, but more than an hour. 44 Q. Who was in			1	
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6			5	-
7 A. On my own, no. 8 Q. And why is it that you were unable to walk? 9 A. My - my - my limb was broken and it was impossible to walk. 11 Q. What was broken? 12 A. My foot. 13 Q. And that was from the rubber bullet? 13 Q. And how long did you stay at the police station? 16 station? 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani police car and I was transferred to another police car and I was transferred to another police car and I was transferred to another Q. And where were you taken to? 19 A. I learned later that this place is Islamabad. 2 Q. How long was the drive in the police car? 3 A. I don't know exactly, but more than an hour. 4 Q. Who was in the police car with you? 4 A. No. 8 Q. Well, were there Pakistani police in the police car, too? 10 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 10 Q. And were you unretaken from — or taken to, is that correct? 10 A. Yes. 11 Q. And when was the hood over your head? 12 Q. Okay. And, then, so you arrived at this next place, in what you think is Islamabad, with a hood over your head? 1 A. Yes. 1 Q. Okay. And, the hen, so you arrived at this next place, in what you think is Islamabad, with a hood over your head? 1 A. Yes. 1 Q. And you were taken to a cell? 1 A. Yes. 1 Q. And how long did you remain there? 1 A. Yes. 1 Q. And how long did you remain there? 1 A. Yes. 1 Q. And how long did you remain there? 1 A. Yes. 1 Q. And how long did you remain there? 1 A. Yes. 2 Q. Mah dwo controlled this facility? 2 A. Ten evaluation of the sack staken in a Pakistani police. 2 2 A. The Pakistani police. 2 3 A. The Pakistani police. 2 4 Q. Do you communicate with any Americans while you were at that facility? 2 A. Yes. 3 Q. Do you remember how many Americans you communicated with? 4 A. Yes. 4 A. Yes. 4 A. Mischard you were they different people than the peoplice car, too? 4 A. We were detained at the back side of the car, the back chamber of the car, which w			6	
8 Q. And why is it that you were unable to walk? 9 A. My my I mib was broken and it was 10 impossible to walk. 11 Q. What was broken? 12 A. My foot. 13 Q. And that was from the rubber bullet? 13 Q. And that was from the rubber bullet? 14 A. Yes. 15 Q. And how long did you stay at the police 16 station? 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani 19 police car and I was transferred to another 10 place. 11 A. I learned later that this place is Islamabad. 12 Q. Who shackled you? 13 A. I learned later that this place is Islamabad. 2 Q. How long was the drive in the police car? 2 A. Khalid al-Sharif. 2 Q. Who was in the police car with you? 3 A. Khalid al-Sharif. 4 Q. Anyone else? 4 A. No. 8 Q. Well, were there Pakistani police in the 10 police car, too? 11 A. Yes. 12 A. Yes. 13 Q. And where were you didn't know 14 Q. So you couldn't see how many other people were 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know 17 exactly where you were taken from or taken 18 to, is that correct? 18 A. My foot. 19 Q. And when was the hood put over your head? 1 A. When I was the hood put over your head? 1 A. When I were at the first prison. 2 Q. Okay. And, then, so you arrived at this next 1 place, in what you think is Islamabad, with a 1 hood over your head? 1 A. Wes. 1 A. Yes. 1 A. Yes. 2 Q. And you were taken to a cell? 1 A. Yes. 2 Q. And how long did you remain there? 1 A. Yes. 2 Q. And how long did you remain there? 1 A. Yes. 2 A. One week, about. 2 Q. And how controlled this facility? 2 A. Gone week, about. 3 Q. And who controlled this facility? 4 A. Yes. 2 D. Win shackled you? 2 MR. SHAMSI: Objection. 2 THE WITNESS: I don't know. What I 2 you were at that facility? 3 A. Yes. 3 Q. Do you remember how many Americans you communicate with any Americans you communicated with? 3 Q. Do you remember how many Americans you communicated with? 4 Yes. 4 Yes. 4 Yes. 6 Q. And were they different people than the person, the American, you had talked to at the Pakist			7	· · · · · · · · · · · · · · · · · · ·
9 A. My - my - my limb was broken and it was impossible to walk. 10 What was broken? 11 Q. What was broken? 12 A. My foot. 13 Q. And that was from the rubber bullet? 14 A. Yes. 15 Q. And how long did you stay at the police station? 16 station? 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani police car and I was transferred to another place. 20 Q. Who shackled you? 21 Q. Who shackled you? 22 Q. Who shackled you? 23 A. The Pakistani police. 24 Q. And where were you taken to? 25 A. Khalid al-Sharif. 26 Q. Anyone else? 27 A. No. 28 Q. Well, were there Pakistani police in the police car, too? 29 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 29 Q. So you couldn't see how many other people were in the car? 30 A. Yes. 31 Q. Oand when was the hood put over your head? 42 Q. And what was from the rubber bullet? 43 A. When I were at the first prison. 44 A. When I were at the first prison. 45 A. Yes. 46 A. Yes. 47 A. Yes. 48 Q. And how long did you remain there? 49 A. I was shackled. I was taken in a Pakistani police. 40 Q. And whor were taken to a cell? 40 A. Yes. 41 A. Yes. 41 A. Yes. 41 A. Yes. 42 Q. And how long did you remain there? 43 A. The Pakistani police. 44 A. Yes. 45 A. I Hammed later that this place is Islamabad. 46 Q. Well were there pakistani police car? 47 A. Ro. 48 Q. Well, were there Pakistani police in the police car, too? 49 Q. And were they different people than the pakistani police station? 40 A. Yes. 41 Yes. 42 Q. And were they different people than the Pakistani police station? 43 Q. So you couldn't see how many other people were in the car? 44 A. Yes. 45 Q. Well, were there Pakistani police in the police car, too? 46 Q. Well, were there Pakistani police in the police car, too? 47 A. Yes. 48 Q. Oand were they different people than the Pakistani police station? 49 A. Yes. 40 Q. And were you interrogated by these three people? 41 A. Yes. 42 Q. How many times were you questioned		•	8	
10 Men I were at the first prison. 10 Q. Okay. And, then, so you arrived at this next place, in what you think is Islamabad, with a hood over your head? 12 A. Yes. 14 A. Yes. 15 Q. And that was from the rubber bullet? 13 hood over your head? 14 A. Yes. 15 Q. And how long did you stay at the police station? 16 A. Yes. 17 Q. And how long did you remain there? 16 A. Yes. 17 Q. And how long did you remain there? 18 Q. And what happened on the tenth day? 18 A. One week, about. 19 Q. And who controlled this facility? 18 A. One week, about. 19 Q. And who controlled this facility? 18 A. One week, about. 19 Q. And who controlled this facility? 18 A. One week, about. 19 Q. And who controlled this facility? 18 A. One week, about. 19 Q. And who controlled this facility? 18 A. One week pabsitiant police or and I was transferred to another place. 21 THE WITNESS: I don't know. What I see were Pakistani people or persons. 19 Q. And who controlled this facility? 18 A. One were place that this place is Islamabad. 22 Q. Who shackled you? 22 3 BY MR. SMITH: 24 Q. Did you communicate with any Americans while the place car? 24 Q. Did you communicate with any Americans while the place car? 25 Q. Do you remember how many Americans you communicate with any			1	
11 Q. What was broken? 12 A. My foot. 13 Q. And that was from the rubber bullet? 14 A. Yes. 15 Q. And how long did you stay at the police 16 station? 17 A. Ten days. 18 Q. And what happened on the tenth day? 19 A. I was shackled. I was taken in a Pakistani 20 police car and I was transferred to another 21 place. 22 Q. Who shackled you? 23 A. The Pakistani police. 24 Q. And where were you taken to? 25 A. I learned later that this place is Islamabad. 2 Q. How long was the drive in the police car? 3 A. I don't know exactly, but more than an hour. 4 Q. Who was in the police car with you? 4 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the 9 police car, too? 10 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 10 Q. So you couldn't see how many other people were in the car? 14 A. Yes. 26 Q. And doscribe for me the place that you were 18 to, is that correct? 19 A. Yes. 20 Q. And describe for me the place that you were 21 C. Who was point of the car, to, is that correct? 22 A. The Pakistani police in the police car. 23 A. I don't know exactly, but more than an hour. 4 Q. Who was in the police car with you? 4 Q. Who was in the police car with you? 5 A. Khalid al-Sharif. 6 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the police car, too? 10 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 16 Q. So you couldn't see how many other people were in the car? 17 (A. The days. 18 A. Yes. 29 (D. And were they different people than the person, the American, you had talked to at the Pakistani police station? 16 Q. So you couldn't know exactly where you were taken from or taken to, is that correct? 18 A. Yes. 29 (D. And describe for me the place that you were			10	
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A. I don't know exactly, but more than an hour. Q. Who was in the police car with you? A. Khalid al-Sharif. Q. Anyone else? A. No. Q. Well, were there Pakistani police in the police car, too? A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. Q. So you couldn't see how many other people were in the car? A. Yes. Q. Okay. And, at the time, you didn't know exactly, but almost every day. Q. And describe for me the place that you were Q. Do you remember how many Americans you communicated with? A. Almost about three people. Q. And were they different people than the person, the American, you had talked to at the Pakistani police station? Q. And were you interrogated by these three people? A. Yes. Q. By all three, or one, or two, or Q. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. For how long each day?			1	
4 Q. Who was in the police car with you? 5 A. Khalid al-Sharif. 6 Q. Anyone else? 6 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the 9 police car, too? 10 A. We were detained at the back side of the car, 11 the back chamber of the car, which was locked 12 with an iron door. 13 Q. So you couldn't see how many other people were 14 in the car? 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know 16 Q. Okay. And, at the time, you didn't know 17 exactly where you were taken from or taken 18 to, is that correct? 19 A. Yes. 19 A. Yes. 20 Q. And describe for me the place that you were 20 Q. For how long each day?			1	
5 A. Khalid al-Sharif. 6 Q. Anyone else? 7 A. No. 8 Q. Well, were there Pakistani police in the police car, too? 9 police car, too? 10 A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. 12 with an iron door. 13 Q. So you couldn't see how many other people were in the car? 14 in the car? 15 A. Almost about three people. 16 Q. And were they different people than the person, the American, you had talked to at the Pakistani police station? 9 A. Yes. 10 Q. And were you interrogated by these three people? 11 people? 12 A. Yes. 13 Q. By all three, or one, or two, or 14 A. The three three of them were sitting down and one person was posing questions. 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? 18 A. I do not remember exactly, but almost every day. 20 Q. And describe for me the place that you were 20 Q. For how long each day?		•	1	
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7 A. No. 8 Q. Well, were there Pakistani police in the 9 police car, too? 9 A. Yes. 10 A. We were detained at the back side of the car, 11 the back chamber of the car, which was locked 12 with an iron door. 13 Q. So you couldn't see how many other people were 14 in the car? 15 A. Yes. 16 Q. Okay. And, at the time, you didn't know 17 exactly where you were taken from or taken 18 person, the American, you had talked to at the Pakistani police station? 9 A. Yes. 10 Q. And were you interrogated by these three 11 people? 12 A. Yes. 13 Q. By all three, or one, or two, or 14 A. The three three of them were sitting down 15 and one person was posing questions. 16 Q. How many times were you questioned by these 17 people? 18 A. I do not remember exactly, but almost every 19 A. Yes. 19 day. 20 Q. For how long each day?			1	
Q. Well, were there Pakistani police in the police car, too? A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. Q. So you couldn't see how many other people were in the car? A. Yes. Q. By all three, or one, or two, or A. The three three of them were sitting down and one person was posing questions. Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? A. Yes. Q. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. For how long each day?		- ·	1	
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A. We were detained at the back side of the car, the back chamber of the car, which was locked with an iron door. Q. So you couldn't see how many other people were in the car? A. Yes. Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? A. Yes. Q. And were you interrogated by these three people? A. Yes. Q. By all three, or one, or two, or A. The three three of them were sitting down and one person was posing questions. Q. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. For how long each day?		- · ·	1	_
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Q. So you couldn't see how many other people were in the car? A. Yes. Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? A. Yes. A. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. By all three, or one, or two, or A. The three three of them were sitting down and one person was posing questions. Q. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. For how long each day?				• •
in the car? A. Yes. Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? A. Yes. 14 A. The three three of them were sitting down and one person was posing questions. 15 Q. How many times were you questioned by these people? 18 A. I do not remember exactly, but almost every day. 20 Q. And describe for me the place that you were 19 A. Yes. 20 Q. For how long each day?				
15 A. Yes. 16 Q. Okay. And, at the time, you didn't know 17 exactly where you were taken from or taken 18 to, is that correct? 19 A. Yes. 20 Q. And describe for me the place that you were 15 and one person was posing questions. 16 Q. How many times were you questioned by these people? 18 A. I do not remember exactly, but almost every day. 20 Q. For how long each day?				
Q. Okay. And, at the time, you didn't know exactly where you were taken from or taken to, is that correct? A. Yes. Q. How many times were you questioned by these people? A. I do not remember exactly, but almost every day. Q. How many times were you questioned by these people? 18 A. I do not remember exactly, but almost every day. 20 Q. For how long each day?				
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19 A. Yes. 20 Q. And describe for me the place that you were 19 day. 20 Q. For how long each day?	18	The state of the s		
Q. And describe for me the place that you were 20 Q. For how long each day?		·		· · · · · · · · · · · · · · · · · · ·
				· ·
	21			A. Nearly hours.
A. That place, it was away, about an hour by car. 22 Q. How many hours?	22	A. That place, it was away, about an hour by car.	22	•
I was taken to a place and I found myself 23 A. I cannot remember exactly.	23	- · · · · · · · · · · · · · · · · · · ·		-
inside a prison, in a room, and that place 24 Q. And what were you questioned about?	24	*	24	

	Page 158		Page 160
1	A. The same questions that had been asked before.	1	A. I didn't have the chance to do so.
2	Q. Okay. Did anyone hit you?	2	Q. Did you confer with a lawyer about the
3	A. No. No.	3	possibility of doing it?
4	Q. Now, while you were held at that Pakistani	4	A. No.
5	location, did any Pakistani officials beat you	5	Q. Now, you would agree with me that my clients
6	in any way?	6	had nothing to do with your foot?
7	A. No. (In Arabic.)	7	MS. SHAMSI: Objection. You may
8	Q. While you were there I'm sorry.	8	answer.
9	A. No.	9	THE WITNESS: What I know is that I
10	Q. While you were at that facility, did you get	10	have been detained and I have been put into
11	any treatment for your foot?	11	I have been detained and this is for on
12	A. Yes.	12	behalf of the American CIA.
13	Q. Who treated your foot?	13	BY MR. SMITH:
14	A. Pakistani police.	14	Q. So, I'm asking you something different,
15	Q. Did you see a doctor?	15	though, Mr. Soud, which is the Pakistanis shot
16	A. Yes. I was taken to the hospital and I saw a	16	you in the foot, right?
17	doctor.	17	A. Yes.
18	Q. Okay. And did you get treatment for your	18	Q. And that was at a time when they were trying
19	broken foot?	19	to arrest you and you were trying to evade
20	A. Yes. I was put into a plaster.	20	being captured, right?
21	Q. A cast?	21	MS. SHAMSI: Objection.
22	A. Cast.	22	THE WITNESS: Correct.
23	Q. Did you get any other	23	BY MR. SMITH:
24	MS. SHAMSI: Sorry. Is that what	24	Q. And you're not trying to hold my clients
	Page 159		Page 161
1	what Mr. Ben Soud said?	1	responsible for anything relating to your
2	THE WITNESS: My foot was put into a	2	foot, right?
3	cast.	3	A. The responsible one is who detained me and
4	BY MR. SMITH:	4	that was on behalf of the CIA and the
5	Q. What other medical treatment did you get?	5	interrogation, interrogating me, was going in
6	A. I was given painkiller.	6	that way.
7	Q. Okay. So, at least at that time, was there	7	Q. I'm going to move to strike the answer as
8	any other medical treatment that you needed?	8	nonresponsive.
9	A. No.	9	Mr. Soud, let me ask you
10	Q. Do you suffer any permanent damage as a result	10	MS. SHAMSI: Can you let her
11	of being shot in the foot?	11	translate what you just said?
12	A. I did not understand the question.	12	MR. SMITH: Oh, sure.
13	Q. Do you suffer any permanent damage as a result	13	(Translation.)
14 15	of being shot in the foot?	14	BY MR. SMITH:
16	A. Yes.	15 16	Q. Let me just ask one more time. To the extent
17	Q. What is the damage?A. When I walk for a long distance, when I eat	17	that you have injuries resulting from being shot in the foot by the Pakistani police, are
18	breakfast, some of the activities, my foot	18	you attempting to hold my client responsible
19	hurts me and it recurs.	19	for those injuries? Yes or no.
20	Q. Mr. Soud, have you sued the Pakistani	20	A. No.
21	government as a result of the officer shooting	21	Q. Now, you stayed at that facility for about a
22	you in the foot?	22	week, is that right, in Islamabad?
23	A. No.	23	A. Yes.
24	Q. Why?	24	Q. And then were you taken somewhere else?
Щ_	` '		

	Page 162		Page 164
1	A. Yes. (In Arabic.)	1	A. I knew that I was detained by the CIA.
2	Q. Where were you taken to?	2	Q. So you're saying that at this airport or
3	INTERPRETER: Where or when? Where	3	airstrip, there was some handoff from the
4	or when?	4	Pakistani police to the CIA?
5	Q. Where. Where were you taken to?	5	MS. SHAMSI: Objection. You may
6	A. To a place unknown to me.	6	answer.
7	Q. So let me understand. Do you remember how you	7	THE WITNESS: Yes.
8	were transported to that place?	8	BY MR. SMITH:
9	A. Yes.	9	Q. And then were you put into the underbelly of
10	Q. Tell me what you recall.	10	an airplane and flown somewhere?
11	A. What I know is that what I remember is that	11	A. They received me and they started some
12	one of those one of the days I was	12	procedures with me which were violent, which
13	shackled, my eyes were blindfolded, and I was	13	were severe, which were bad, before they put
14	transferred to a place that I don't know, and	14	me inside the plane.
15	I found myself underneath a huge plane and I	15	Q. Okay. So tell me what happened with respect
16	was handed by the Pakistani police to the CIA.	16	to these procedures before you were put in the
17	Q. So let me make sure. You were taken out of	17	plane.
18	the prison in shackles, yes?	18	A. First of all, I was handed with I was
19	A. Yes.	19	handed over in a very, very severe way, and
20	Q. And you were blindfolded at the time you left	20	took off off the hood from my head and the
21	the prison?	21	thing that was holding my eyes and pointed a
22	A. Yes.	22	very strong high light on my eyes, and they
23	Q. And you were put into a Pakistani police car?	23	pulled violently on my clothes, till I became
24	A. Yes.	24	stark naked. They cut the cast that was on my
2 1		24	· · · · · · · · · · · · · · · · · · ·
	Page 163		Page 165
1	Q. And was al-Sharif with you?	1	leg and threw it away. They started
2	A. Yes.	2	inspecting or examining my eyes and my mouth
3	Q. And he was shackled and blindfolded, too?	3	and my nose and they carried ways that are
4	A. I think so.	4	degrading to the human dignity and placed a
5	Q. Okay. And you were taken to a an airport	5	diaper or a nappy on me, a diaper.
6	of some sort, or an airstrip?	6	MR. ALHALABI: He only said diaper.
7	A. Yes.	7	INTERPRETER: Diaper.
8	Q. And you were put into an airplane?	8	THE WITNESS: And put a shirt, a
9	A. No, I was not put into a plane.	9	top, like a kameez, a kameez
10	Q. Okay. So you were taken to an airport, and	10	MR. ALHALABI: A T-shirt.
11	what happened?	11	THE WITNESS: a short one on me.
12	A. I was taken to the airport and underneath the	12	INTERPRETER: A shirt?
13	airplane there was another group that received	13	MR. ALHALABI: T-shirt.
14	me.	14	INTERPRETER: T-shirt.
15	Q. Okay. Now, at that time, did you think that	15	(Translation.)
16	that group may be the Gaddafi regime?	16	THE WITNESS: And shackled my feet
17	A. No.	17	and my hands, and brought my hands, my legs,
18	Q. Why?	18	towards my belly and bound bind that.
19	A. Because the American interrogator told me that	19	They put earplugs into my ears.
20 21	I will be transferred to a bad place and that	20	They closed my eyes with cotton pieces. They
17.1	I will be interrogated in that place in a	21	put a tape around my eyes and put the hood on
		1')')	
22	severe manner.	22	top of my head and put headphones on my ears
	severe manner. Q. How do you know that place wasn't controlled by the Gaddafi regime?	22 23 24	and took me by force, forcibly, took me forcibly and made me climb the plane stairs,

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	Page 170	Page 172
1	MS. SHAMSI: Jim, do you think it	1 *** ERRATA SHEET *** TRANSPERFECT DEPOSITION SERVICES
2	might be time to wrap up? And we can	2 216 E. 45th Street, Suite #903
3	definitely start up again. I think everyone	NEW YORK, NEW YORK 10017
4	is getting tired with the translation and the	3 (212) 400-8845 4 CASE: SULEIMAN ABDULLAH SALIM et al. v. MITCHELL
5	witness is getting tired.	DATE: JANUARY 31, 2017
6	BY MR. SMITH:	5 WITNESS: MOHAMED AHMED BEN SOUD REF: 17957
7	Q. Are you getting tired?	6 PAGE LINE FROM TO 7
8	A. Yeah.	8
9	MR. SMITH: Okay. Let's stop.	9
10	VIDEOGRAPHER: This is the end of	10
11	the deposition for today. The time is 6:05.	12
12	We're off the record.	13
13	(Proceedings adjourned: 6:05 p.m.)	15
14		16
15		17
16		19
17		20
18		21
19		MOHAMED AHMED BEN SOUD
20		22
21		Subscribed and sworn to before me
22		this day of, 20
23		24
24		25 Notary Public
	Page 171	
1	COMMONWEALTH OF MASSACHUSETTS)	
2	SUFFOLK, SS:)	
3	jerrozik, ss.	
4	I, JANE M. BORROWMAN, Registered	
5	Professional Reporter and Notary Public in and	
6	for the Commonwealth of Massachusetts, do	
7	hereby certify that on January 31, 2017,	
8	Mohamed Ahmed Ben Soud, the witness whose	
9	deposition is hereinbefore set forth, was duly	
10	sworn by me and that such deposition is a true	
11	record of the testimony given by the witness.	
12	I further certify that I am neither	
13	related to or employed by any of the parties	
14	in or counsel to this action, nor am I	
15	financially interested in the action.	
16	In witness whereof, I have hereunto	
17	set my hand and seal this 12th day of February	
18	2017.	
19		
20	Notary Public	
21	RPR No. 001420	
22		
23	My commission expires:	
24	7 December 2023	

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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 II

February 1, 2017

Reported by:

Jane M. Borrowman, RPR, CSR

Job no: 17958

	Page 182		Page 184
1	A. (Translation.)	1	Q. Do you know what source you relied upon to
2	Q. Did anyone explain	2	come to the conclusion that Cobalt was in
3	A. Yes.	3	Afghanistan?
4	Q to you why you were taken to that facility?	4	A. Through interrogations and the media.
5	A. No.	5	Q. Are you telling me that the interrogators told
6	Q. Did anyone from the CIA ever advise you that	6	you that Cobalt was in Afghanistan?
7	because of your affiliation with the Libyan	7	MS. SHAMSI: Objection. You may
8	Islamic Fighting Group, the United States	8	answer.
9	believed that you were affiliated with	9	THE WITNESS: No. Interrogations
10	Al-Qaeda?	10	did not tell me that. If what you mean is
11	MS. SHAMSI: Objection. You may	11	reports from the media and the news told me
12	answer.	12	about that, yes, while I was following, I knew
13	THE WITNESS: No.	13	that that that the place was in
14	BY MR. SMITH:	14	Afghanistan.
15	Q. What were you told?	15	BY MR. SMITH:
16	A. The first meeting where I knew that I was at	16	Q. How long were you at Cobalt?
17	the grasp of the CIA and that the place I was	17	A. A year and few days.
18	in was belongs to that this institution	18	Q. So you arrived there sometime in September of
19	belonged to the CIA, that short encounter,	19	'03?
20	which took place as soon as I arrived to the	20	A. I arrived at the prison Cobalt in April of
21	prison Cobalt, she told me, that interrogator,	21	2003.
22	now you are in the grasp of the USA and that	22	Q. Okay. And you remained at Cobalt until April
23	you do not have any rights in this place.	23	of '04?
24	Q. What else did she say?	24	A. Yes.
	Page 183		Page 185
1	A. She didn't say anything.	1	Q. And how many other people were detained with
2	Q. Now, you used the word "Cobalt." When did you	2	you at Cobalt during that time?
3	learn about the word "Cobalt"?	3	A. I don't know exactly.
4	A. Later on and through me following the media	4	Q. Can you tell me the names of any other people
5	during through the days, it came to my	5	that were detained there with you?
6	knowledge that the place I had been in was	6	A. Khalid al-Sharif was there. Ayoub was there.
7	called "Cobalt."	7	Q. You gotta go a little slower. Spell the
8	Q. At the time that you were taken to the	8	names, please.
9	facility and while you were there, did you	9	A. K-H-L-E-D (sic), A-S-H-A-R-E-E-F. Ayoub was
10	know what the name of the facility was?	10	there. Ayoub, A-Y-O-U-B. Majed was there.
11	A. No.	11	M-A-J-E-D. Saleh Al-Driki was there. S-L
12	Q. Did you know what country the facility was	12	S-A-L-E-H. A-L-D-R-I-K-I.
13	located in?	13	Q. Do you recall the names of anyone else that
14	A. I did not know. At that time, I did not know.	14	was detained at Cobalt during the period of
15	Q. Do you know now?	15	time that you were detained?
16	A. I knew through following up the media and the	16	A. Now, this is all what I recall.
17	news that that place was called Afghanistan.	17	Q. During the period of time that you were at
18	Q. Now, when did you find out that this place	18	Cobalt, did you have any contact with a
19	called "Cobalt" was located in Afghanistan?	19	Suleiman Abdullah Salim?
20	MS. SHAMSI: Objection. You may	20	A. I didn't know that this person was there.
21	answer.	21	INTERPRETER: The interpreter would
22	THE WITNESS: I don't know exactly,	22	ask the interpreter would ask the counsel
23	but through following the media.	23	to repeat the last name of Suleiman.
24	BY MR. SMITH:	24	MR. SMITH: Sure. It's Salim,

	Page 214		Page 216
1	advice on how detainees should be treated at	1	A. I don't know.
2	Cobalt?	2	Q. Now, can you describe for me, sir, the third
3	A. I do not know precisely.	3	stage?
4	Q. Is it your testimony, sir, that hanging you by	4	A. The third stage, I which continued during
5	your hands for long periods of time was part	5	all the period I have stayed in the prison,
6	of Dr. Mitchell's and Dr. Jessen's program?	6	shackling was decreased. There was light, a
7	A. Yes. I knew later from that it was the	7	faint light in the room, in the cell. Then, I
8	program of it was from the program of	8	was allowed to shower and to change my
9	Dr. Mitchell.	9	clothes. And the interrogations continued
10	Q. Who told you that?	10	continuously. And shackling was only
11	A. I knew this through following with the media.	11	administered to one hand and attached to the
12	Q. And what particular article or news report	12	wall. And loud music continued. And
13	were you relying upon to come to this	13	disruption, continuous disruption, continued
14	conclusion?	14	from the guards, on the hour.
15	A. Through following the BBC and Al Jazeera, I	15	Q. Can you describe for me the disruption that
16	I it was mentioned that this program was	16	you made reference to?
17	it was mentioned about the program that was	17	A. Disruption meaning banging on the door to wake
18	prepared by Dr. Mitchell which has been	18	me up and I have to stand up and I was forced
19	applied on the prisoners, and I have	19	to do so so they can make sure that I have
20	discovered that this is the same program that	20	already been awake, and that continued for
21	has been applied on me.	21	on the top on the top of each hour, nearly
22	Q. Now, let me go back to you said there were	22	on the top of each hour.
23	three stages while you were at Cobalt. Can	23	Q. And how long did that continue?
24	you describe for me stage two?	24	A. That condition continued all the time that I
	Page 215		Page 217
1	A. After the end of the first stage, the head of	1	had been there.
2	interrogators came and told me that there	2	Q. Now, during the period of time that you
3	would be a new interrogation and adopting	3	experienced these conditions in what you refer
4	methods more severe and more hard and in	4	to as stage three, do you have any evidence
5	and, actually, the second group adopted that	5	that Dr. Mitchell or Dr. Jessen knew anything
6	for three weeks, and it was more cruel and	6	about it?
7	more fierce.	7	A. As I have mentioned and I told you, that all
8	Q. What was done to you during these three weeks?	8	these that I have gone through, which I named
9	A. During these three weeks that were the worst	9	stage three, all that was prepared by
10	of all in Cobalt, I was shackled, hands and	10	Dr. Mitchell and his companion.
11	legs. I was being chained to a ring in the	11	Q. I'm going to move to strike your answer as
12	wall. The loud music, the very loud music	12	nonresponsive.
13	continued. Food deprivation. No care for	13	Do you have any evidence that
14	cleanliness. I was the darkness.	14	Dr. Mitchell or Dr. Jessen was aware of the
15	They started to use new methods,	15	conditions that you experienced during stage
16	including throwing me against the wall,	16	three, as you described it?
17	torture by pouring icy water, slamming,	17	A. I don't know.
18	punching, holding the jaw forcibly, insults,	18	Q. Now, what happened after stage three?
19	throwing insults, forcing me to walk, to walk	19	A. I was transferred to another place. I was
20	on my using my leg, and being hanged by the	20	transferred on April the 25th with or after
21	hands.	21	very degrading and humiliating procedures,
22	Q. Do you have any evidence that either	22	including being naked, manipulation of sexual
23	Dr. Jessen or Dr. Mitchell was aware of these	23	organs and degrading to my pride and dignity,
24	events when they occurred?	24	being forced to be naked and putting a diaper

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1	strike that.	1	Q. And is it your belief that Drs. Jessen and
2	During the period of time that you	2	Mitchell ordered those people who were at
3	were detained at Cobalt, did you ever see	3	Cobalt to do those things to you?
4	Dr. Mitchell?	4	A. Yes.
5	A. No.	5	Q. And you believe that the basis of giving that
6	Q. Did you ever talk to anyone that you believed	6	order was your review of the Senate Select
7	to be Dr. Mitchell?	7	report that's marked as Exhibit 1?
8	A. Yes, I talked with the lawyers that I have	8	MS. SHAMSI: Objection. You may
9	seen Dr. Mitchell in prison.	9	answer.
10	MS. SHAMSI: I'm going to caution	10	THE WITNESS: What I believe in was
11	you in terms of revealing any subject matter	11	through my personal experience at the prison
12	of our revealing the content of our	12	of Cobalt and what was assured by this report.
13	conversations on the basis of privilege.	13	BY MR. SMITH:
14	Please answer.	14	Q. Is there any basis, factual basis, that you
15	BY MR. SMITH:	15	have that Drs. Jessen and Mitchell ordered the
16	Q. Mr. Soud, I don't want to know what you talked	16	things that happened to you at Cobalt other
17	to your lawyers about. Okay. Here's what I	17	than what's been marked as Exhibit 1, which is
18	do want to know: At any time that you were at	18	the Senate Select Committee on Intelligence
19	Cobalt, did you ever see Dr. Mitchell at	19	report, any other basis?
20	Cobalt?	20	MS. SHAMSI: Objection. You may
21	A. No.	21	answer.
22	Q. Did you ever talk to Dr. Mitchell at Cobalt?	22	THE WITNESS: I don't know.
23	A. No.	23	BY MR. SMITH:
24	Q. How about at the other facility, did you ever	24	Q. Okay. Did any person, any human being, ever
	Page 299		Page 301
1	see or talk to him?	1	tell you that Drs. Jessen and Mitchell ordered
2	A. No.	2	the things that happened to you while you were
3	Q. Now, Dr. Jessen, when you were at Cobalt,	3	at Cobalt, anybody ever tell you that?
4	detained at Cobalt, did you ever see or talk	4	MS. SHAMSI: Objection. You may
5	to Dr. Jessen?	5	answer.
6	A. No.	6	THE WITNESS: I don't know.
7	Q. When you were at the other facility, did you	7	BY MR. SMITH:
8	ever see or talk to Dr. Jessen?	8	Q. Are you aware that Drs. Jessen and Mitchell
9	A. No.	9	have offered sworn testimony in this lawsuit?
10	Q. Now, as I appreciate it, you believe that the	10	A. I heard that.
11	people that did those things to you at Cobalt	11	Q. Okay. Are you aware that they testified that
12	and at the other place were doing it based	12	they played no role in anything that happened
13	upon a program that was established by	13	to you at Cobalt?
14	Mitchell and Jessen, correct?	14	A. I don't know.
15	A. Yes.	15	Q. Well, what, if anything, were you told about
16	Q. And that's based upon your personal opinion?	16	their testimony as it pertains to you?
17	A. Yes.	17	MS. SHAMSI: Objection. It calls
18	Q. And you think that everything that happened to	18	for privileged information and I'm going to
19	you at Cobalt and the other facility, when you	19	instruct him not to answer that.
20	were detained, was part of that program?	20	MR. SMITH: Okay.
21	A. What I believe in is that what I have	21	(Translation.)
22	experienced from torture methods was in	22	BY MR. SMITH:
23	Cobalt, was from a program designed by these	23	Q. Is the sole basis for your understanding of
24	doctors.	24	the testimony that was offered by

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1	Drs. Mitchell and Jessen what your lawyers	1	COMMONWEALTH OF MASSACHUSETTS)
2	told you?	2	SUFFOLK, SS:)
3	A. I did not understand the question.	3	
4	Q. Okay. Do you have an understanding of what	4	I, JANE M. BORROWMAN, Registered
5	Drs. Jessen and Mitchell testified at their	5	Professional Reporter and Notary Public in and
6	depositions?	6	for the Commonwealth of Massachusetts, do
7	A. I heard about this.	7	hereby certify that on February 1, 2017,
8	Q. And did you hear about it from your lawyers?	8	MOHAMED AHMED BEN SOUD, the witness whose
9	A. Yes.	9	deposition is hereinbefore set forth, was duly
10	Q. Did you hear about it from any source other	10	sworn by me and that such deposition is a true
11	than your lawyers?	11	record of the testimony given by the witness.
12	A. No.	12	I further certify that I am neither
13	MR. SMITH: Okay. We have no	13	related to or employed by any of the parties
14	further questions of the witness.	14	in or counsel to this action, nor am I
15	MS. SHAMSI: Thanks. I want to take	15	financially interested in the action.
16	just a few minutes to go through my notes to	16	In witness whereof, I have hereunto
17	see whether I have any questions to pose.	17	set my hand and seal this 13th day of February
18	MR. SMITH: You'll let us know when	18	2017.
19	you're ready.	19	
20	THE COURT: The time is 5:27. We're	20	Notary Public
21	off the record.	21	RPR No. 001420
22	(Brief pause.)	22	
23	VIDEOGRAPHER: Back on the record.	23	My commission expires:
24	The time is 5:38.	24	7 December 2023
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1	EXAMINATION	1	*** ERRATA SHEET *** TRANSPERFECT REPOSITION SERVICES
2	BY MS. SHAMSI:	2	TRANSPERFECT DEPOSITION SERVICES 216 E. 45th Street, Suite #903
3	Q. Mr. Ben Soud, Mr. Smith was asking you		NEW YORK, NEW YORK 10017
4	questions about your visa applications. Did	3 4	(212) 400-8845 CASE: SULEIMAN ABDULLAH SALIM et al. v. MITCHELL
5	you make those applications directly or did		DATE: FEBRUARY 1, 2017
6	your lawyers make them on your behalf?	5 6	WITNESS: MOHAMED AHMED BEN SOUD REF: 17958 PAGE LINE FROM TO
7	A. The lawyers did that on my behalf.	7	
8	MS. SHAMSI: That's it. I have no	8	
9	further questions.	10	
10	MR. SMITH: Mr. Soud, thank you. I	11	
11 12	have no further questions. VIDEOGRAPHER: This is the end of	12	
13	the deposition for today, Volume 2, and the	14	
13 14	time is 5:39. We're off the record.	15 16	
15	(End of deposition: 5:39 p.m.)	17	
16	(End of deposition: 3.39 p.m.)	18	
17		19 20	
18			
19		21	MOHAMED AHMED BEN SOUD
20		22	
21		23	Subscribed and sworn to before me
22		"	this day of, 20
23		24	
24		25	Notary Public

34 (Pages 302 to 305)