

1 Emily Chiang, WSBA No. 50517  
2 [echiang@aclu-wa.org](mailto:echiang@aclu-wa.org)  
3 AMERICAN CIVIL LIBERTIES UNION  
4 OF WASHINGTON FOUNDATION  
5 901 Fifth Avenue, Suite 630  
6 Seattle, WA 98164  
7 Phone: 206-624-2184

8 Dror Ladin (admitted *pro hac vice*)  
9 Steven M. Watt (admitted *pro hac vice*)  
10 Hina Shamsi (admitted *pro hac vice*)  
11 AMERICAN CIVIL LIBERTIES UNION FOUNDATION

12 Lawrence S. Lustberg (admitted *pro hac vice*)  
13 Kate E. Janukowicz (admitted *pro hac vice*)  
14 Daniel J. McGrady (admitted *pro hac vice*)  
15 Avram D. Frey (admitted *pro hac vice*)  
16 GIBBONS P.C.

17 *Attorneys for Plaintiffs*

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

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

24 Plaintiffs,

25 v.

26 JAMES ELMER MITCHELL and JOHN  
"BRUCE" JESSEN

Defendants.

2:15-CV-286-JLQ

DECLARATION  
OF SULEIMAN  
ABDULLAH  
SALIM

1 I, **SULEIMAN ABDULLAH SALIM**, make this declaration pursuant to 28  
2 U.S. Code § 1746:  
3

4 1. My name is Suleiman Abdullah Salim, and I am one of the  
5 Plaintiffs in this matter.

6 2. I am over 18 years of age, have personal knowledge of all the facts  
7 contained in this Declaration, and am competent to testify as a witness to these  
8 facts.  
9

10 3. From March 2003 to May 2003, I was detained at a CIA-run  
11 facility, known as COBALT. I know this facility as the “Darkness.”

12 4. I make this declaration based on my personal experience of my  
13 detention and interrogation in the Darkness, and other U.S. facilities, and the  
14 abusive treatment I suffered there.  
15

16 5. I experienced my most abusive treatment in the Darkness, where  
17 CIA interrogators used interrogation methods on me repeatedly and in  
18 combination, beginning about a week after my initial detention and lasting about  
19 two months.  
20

21 6. Beyond interrogation methods, CIA interrogators subjected me to  
22 other forms of abusive treatment for the entire time I was held in the Darkness,  
23 including extreme sensory deprivation, I was held in solitary confinement,  
24  
25  
26

1 chained and shackled in a small, pitch-black windowless, filthy cell. Western  
2 pop-music, sometimes interrupted by a mixture of cacophonous sounds like  
3 yowling and the clanging of bells, blared continuously at ear-splitting levels,  
4 inside and outside my cell. I felt completely isolated and disoriented. I had little  
5 or no sense of time, and I never knew whether it was day or night. A nauseating  
6 stench pervaded the entire building. I wasn't provided with toilet or washing  
7 facilities, nor a bed or a mattress on which to sleep. I was deprived of adequate  
8 food and water. I was treated like I wasn't human, worse than an animal. These  
9 extremely harsh and debilitating conditions caused me great mental anguish and  
10 acute distress.  
11  
12  
13

14 7. In my cell, for about the first week of my detention, guards chained  
15 me, naked except for a diaper, by my arms and legs to a rusty hoop that was  
16 attached to the wall, my arms outstretched and at eye level. The only position I  
17 could safely adopt was a squatting position that very quickly became  
18 uncomfortable and extremely painful. This excruciating stress position, together  
19 with the putrid smell and deafening noise, made it impossible for me to sleep.  
20 As a result, I was left continually physically and mentally exhausted.  
21  
22

23 8. About a week after my initial detention, two guards unchained me  
24 and took me from my cell to meet with someone whom I believed to be a doctor.  
25  
26

1 He X-rayed the fingers on my right hand, bandaged them, and examined my  
2 entire body. He focused on my nose, which, like my fingers, had been broken  
3 during my capture in Somalia a few weeks earlier but had remained untreated.  
4 Shortly after this examination, my abuse became even more severe. I believe  
5 that the examining doctor gave interrogators the go-ahead to continue and  
6 increase my ill-treatment. For about the next four or five weeks, interrogators  
7 used a variety of abusive interrogation methods, some of which they applied  
8 repeatedly and in combination.  
9  
10  
11

12 9. Interrogators kept me naked or in diapers for the entire time I was  
13 held in the Darkness. The only time they gave me clothing was during a few of  
14 my interrogation sessions. I did not understand why they gave me clothing for  
15 these sessions, nor why they stripped me afterwards. The forced nudity left me  
16 feeling vulnerable, helpless, and deeply humiliated.  
17

18 10. Interrogators subjected me to other violent and terrifying methods  
19 of interrogation involving water. These water sessions lasted about four or five  
20 consecutive days. Interrogators followed similar procedures each session. They  
21 first stripped me naked and forced me to lie down in the center of a large plastic  
22 sheet. They then repeatedly doused me in gallons of ice-cold water. The water  
23 was so cold it left me gasping for air and unable to breathe. My heart felt as if it  
24  
25  
26

1 would jump out of my chest. As I lay naked and shivering on the soaking wet  
2 floor, the men would forcefully slap me in the face and stomach. They also  
3 kicked me in the stomach and back. During some of the later sessions, the men  
4 placed a hood over my head. When the freezing water soaked in, the hood clung  
5 to my face and caused me to choke and suffocate. I felt like I was drowning.  
6  
7 Each session lasted about 20 or 30 minutes, after which the men pulled up the  
8 corners of the freezing cold sheet and rolled me inside. Covered in the plastic  
9 sheet, I was left by my interrogators to shiver violently in the cold for about 10  
10 or 15 minutes before being taken to another room for further interrogation.  
11

12  
13 Interrogators repeated this procedure many times over the four- or five-day-long  
14 period.  
15

16 11. On the first day that interrogators used water in their interrogation  
17 sessions, they also introduced a new abusive method. Interrogators showed me  
18 a small wooden box, measuring about three square feet. There were holes on  
19 one side and another was hinged with a lock and padlock. Interrogators stuffed  
20 me inside the box, naked, chained and shackled, and then locked it shut. The  
21 space was pitch-black, and so small that I was bent over my knees. The box  
22 smelled rancid. Interrogators kept me locked inside for about half an hour,  
23 though it felt much longer. I vomited out of pain and fear. Interrogators  
24  
25  
26

1 continued to threaten to use this method on me on a number of other occasions,  
2 by stuffing me inside the box for a short period without locking the door. Even  
3 the threat of the small box filled me with dread.  
4

5 12. After interrogators stopped using the ice water method on the  
6 second day, they again subjected me to yet another interrogation method. Two  
7 interrogators took me from the water-dousing room to another room in which a  
8 wooden wall had been constructed. One of them placed a cloth collar tightly  
9 around my neck. The collar was attached to a leash. Using the leash, one of the  
10 interrogators pulled me forcefully towards him, slapped me in the face and then  
11 threw me against the wooden wall. I crashed into it, and as I rebounded, the  
12 interrogator struck me in the stomach. Interrogators repeated this same  
13 procedure several times before taking me for interrogation. As the session  
14 continued, it became more and more painful. My body ached all over and I  
15 developed a severe headache and dizziness immediately after the session ended.  
16 The headache and dizziness lasted for hours.  
17  
18  
19  
20

21 13. After interrogators stopped using the wooden wall, they forced me  
22 into a very tall, thin, coffin-like box. The box was just wide and high enough to  
23 accommodate me with my arms stretched over my head. Once crammed inside,  
24 interrogators chained my hands above my head to a thin metal rod that ran the  
25  
26

1 width of the box. They then closed the door and left me in darkness, with music  
2 blasting at me in the box from all angles. Interrogators left me inside for two or  
3 three hours. When they released me I could barely hear. I had a splitting  
4 headache that lasted hours. My arms felt numb and my shoulders as if they were  
5 dislocated.  
6

7  
8 14. On the final day on which interrogators doused me with ice-cold  
9 water, at the end of one of the day's many sessions, interrogators subjected me  
10 to yet another terrifying method involving the use of water. Interrogators  
11 strapped my hands and feet to a pivoted, wooden board and threatened to pour  
12 water directly into my mouth and nose. They did not follow through on this  
13 threat, but instead spun me around in circles several times until I became dizzy,  
14 nauseous, and completely disoriented.  
15  
16

17 15. Around the beginning of the fourth or fifth week, some time after  
18 interrogators stopped using the water method and slamming me against the  
19 wooden wall, interrogators used another physically painful method to deprive  
20 me of sleep. Two guards unchained me from the hook in my cell and took me to  
21 another small, pitch-black room. Working by torchlight, the guards chained my  
22 arms above my head to a metal rod that ran the width of the small room and  
23 positioned me so that the balls of my feet barely touched the floor. The guards  
24  
25  
26

1 left me hanging, naked, in the darkness, barraged with music played at ear-  
2 splitting levels for what seemed like four or five days. During this time, I was  
3 provided no food and only sips of water. I remained suspended from the ceiling  
4 without interruption, including when I relieved myself. The only time I was  
5 taken down was for interrogation. On occasion, I started to drift into sleep, but  
6 each time was immediately jolted awake from the excruciating pain that shot  
7 through my arms and shoulders as they momentarily supported my full body  
8 weight. After interrogators stopped this method, I had searing pain in my back  
9 and shoulders, the lower and upper parts especially. My arms felt as if they had  
10 become dislocated. Both my legs were swollen and there was a sickening smell  
11 from beneath the plaster cast on my hand. A large cut had also opened on the  
12 same hand. A doctor or nurse treated me. He did nothing for my swollen legs  
13 but removed the bandages from my fingers and attempted to straighten them.  
14 He also bathed my wound and re-banded my fingers.  
15  
16  
17  
18  
19

20 16. Interrogators interspersed the use of these methods with  
21 interrogation sessions, during which interrogators would ask me the same  
22 questions over and over again, demanding answers to many questions that I  
23 knew nothing about. In between questions, interrogators beat me repeatedly.  
24 They would forcibly shove and push me, hold me firmly by the jaw, and strike  
25  
26



1 me in the face and stomach. These methods caused me severe and acute pain in  
2 my jaw, face and stomach, which lasted for many hours after, and continues  
3 today.  
4

5 17. I was in a constant state of terror because of the repeated  
6 applications of the interrogators' abusive methods and the inhumane conditions  
7 of my confinement. I became so hopeless and helpless that I decided to end my  
8 life. I stockpiled painkillers given to me by medics over the weeks of my  
9 detention to ease the pain in my right hand, and I attempted to swallow them and  
10 overdose. However, before I was able to swallow them, guards entered my cell  
11 and stopped me. After this incident, interrogators stopped their abusive  
12 interrogations and transferred me to another CIA prison nearby.  
13  
14  
15

16 18. I still suffer the excruciating physical and mental effects of my time  
17 in the Darkness and the interrogators' abusive treatment of me. My whole body  
18 still aches, my upper and lower back especially. I regularly suffer crippling  
19 flashbacks and nightmares. They're a constant reminder of that place and the  
20 terrible things that were done to me there.  
21  
22  
23

24 I declare under penalty of perjury under the laws of the United States of  
25 America that the foregoing is true and correct.  
26

1 Executed on May 22, 2017

2  
3   
4

5  
6 Suleiman Abdullah Salim

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26