

EXHIBIT

B

F) *Duration more than 1 month.* Criterion met.

G) *Clinically significant distress or social, occupational, or other impairment.* Criterion met, as follows. In addition to the high degree of emotional distress caused by the symptoms described above, Mr. Ben Soud, has received feedback from his work supervisors that he has a negative attitude, and that he needs to be more self-confident.

H) *Disturbance not attributable to the physiological effects of a substance or another medical condition.* Criterion met. No evidence of this.

Mr. Ben Soud reported that his PTSD symptoms were at their worst during the several months in 2004 following his transfer from Cobalt. Per the Clinician-Administered PTSD (CAPS) scale, at that time his PTSD could be characterized as severe. Mr. Ben Soud reported that over the 13 years since then, he has experienced substantial but incomplete improvement. Per the CAPS, his PTSD may be characterized now as mild/subthreshold. Mr. Ben Soud no longer meets the full diagnostic criteria for PTSD, but he still suffers from several symptoms. I call this "PTSD, in partial remission." The prognosis is favorable for further, gradual improvement over the years. However, I do not expect that Mr. Ben Soud will ever be entirely free of his PTSD symptoms, and the possibility of relapse will exist into the indefinite future.

The question arises as to what portion of Mr. Ben Soud's PTSD was caused by the use on him of the enhanced interrogation techniques (EITs) recommended to the CIA by Defendants, as spelled out in Memorandum from Jim Mitchell on Subject, "Description of Physical Pressure," July 9, 2002. Mr. Ben Soud never met Defendants Mitchell and Jessen. Nor were they present any time he was being interrogated. Plaintiffs claim that techniques Mitchell and Jessen previously devised were used in their absence on Mr. Ben Soud. Under History above, I have documented Mr. Ben Soud's ranking (with no direction from me) of his most traumatic experiences, in *descending* order. Of the 8 events reported by Mr. Ben Soud as having been most traumatic to him, only #7, viz., sleep deprivation, and #6, viz., having water poured on his mouth and face until he thought he would

drown, were components of Defendants' recommended EITs. Regarding the latter, there is conflicting information as to whether this actually happened. Mr. Ben Soud told me that it did. However, this report appears to conflict with information in the Complaint, which reads, "While they did not pour water directly over his [Mr. Ben Soud's] mouth and nose, they threatened to do so if he did not cooperate."

According to his own rankings, and the subsequent symptoms he reported, the bulk of Mr. Ben Soud's PTSD appears to have derived from events that were either a) not part of Defendants' EITs, e.g., his arrest, his sexual degradation (which was worst for him of all), and his dousing with ice water; or b) gross exaggerations of Defendants' EITs performed in the absence of Defendants' supervision. For example, per the Memorandum from Jim Mitchell on Subject, "Description of Physical Pressure," July 9, 2002, "stress positions" are supposed to "focus on producing mild physical discomfort from prolonged muscle use, rather than pain associated with contortions or twisting of the body." Examples given include "the subject sitting on the floor with legs extended straight out in front of him with his arms raised above his head," and "having the subject kneel on the floor and lean back at a 45 degree angle." Stress positions recommended by Defendants do not include the subject's being hung from the ceiling by his arms for more 36 hours. On the other hand, sleep deprivation and waterboarding, if the latter occurred, were ranked #6 (tied with #5) and #7 by Mr. Ben Soud in his hierarchy of traumatic events.

The fact that Mr. Ben Soud ranked several events that occurred during his arrest and captivity as having been more traumatic supports the conclusion that only a relatively small portion of Mr. Ben Soud's PTSD is attributable to the administration of Defendants' recommended EITs.

During his captivity at Cobalt, Mr. Ben Soud developed a Major Depressive Disorder (MDD). Although the DSM-5 does not recognize a cause for MDD, it is my impression that his MDD was precipitated by his confinement in general, and by the specific traumatic events described above that caused his PTSD. Following his freedom, Mr. Ben Soud made a full recovery from this disorder.