

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

- - -  
SULEIMAN ABDULLAH :  
SALIM, MOHOMED AHMED : DOCKET NO.  
BEN SOUD, OBAID ULLAH :  
(as personal : 2:15-CV-286-JLQ  
representative of GUL :  
RAHMAN), :

Plaintiffs, :

v. :

JAMES ELMER MITCHELL :  
and JOHN "BRUCE" :  
JESSEN, :

Defendants. :

- - -  
Monday, January 16, 2017  
- - -

Videotaped deposition of JAMES E. MITCHELL taken pursuant to notice, was held at the law offices of Blank Rome, 130 N. 18th Street, Philadelphia, Pennsylvania 19103, beginning at 10:13 AM, on the above date, before Constance S. Kent, a Registered Professional Reporter and Notary Public in and for the Commonwealth of Pennsylvania.

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1 you could just answer that?

2 A. You'd refer it for an  
3 evaluation, you'd say, you know, rule out  
4 PTSD.

5 Q. Okay. And do you recall  
6 actually doing that in some  
7 circumstances?

8 A. I recall back -- when I was  
9 at Wilford Hall, I recall treating people  
10 for PTSD who were in Desert 1. I don't  
11 know if you're familiar with that.

12 Q. Pardon me?

13 A. Desert 1? That's when they  
14 tried to rescue the hostages --

15 Q. Right.

16 A. -- that the Iranians had and  
17 they were all those mishaps on those  
18 planes. I worked with some of the flight  
19 engineers off the C130s that had burned  
20 up, and I did, you know, PTSD counseling  
21 with those folks.

22 Q. And I guess just one -- just  
23 one definitional thing. I was looking at  
24 this resume. It says, chief

1 harm; is that right?

2 A. Well, what I'm trying to  
3 do -- that's what I said here obviously,  
4 but you don't want to have permanent or  
5 profound, you know, mental harm, mental  
6 or physical harm.

7 Q. Okay. What did you mean by  
8 profound and pervasive personality  
9 change?

10 A. One of the things that  
11 happens if you use these techniques too  
12 much, and going -- this is -- this is the  
13 warning that I provided them about  
14 Seligman's things. If you apply one of  
15 these techniques -- the object -- it's  
16 just the same -- it's the same template  
17 that's used in the Army field manual  
18 today for the use of helplessness. Same  
19 template, different techniques, right?  
20 You put the person in a situation that  
21 they perceive to be helpless and then you  
22 gave them a way out of that situation by  
23 answering questions.

24 If you don't give them that

1 way out, then you run the risk of doing  
2 the sorts of things where you -- where  
3 instead of just talking about acquired  
4 helplessness, now you're talking about  
5 the experimental outcomes that Seligman  
6 talks about, all right?

7                   So what -- what you have to  
8 be sure you do is once the person begins  
9 to display a sense of whatever the  
10 emotion is that you're using, for  
11 example, anger. Anger would be another  
12 one that you could use, or affinity for  
13 the person would be one you could use, or  
14 fear would be one you could use.

15                   What you do is you evoke  
16 that fear -- or that emotion, create it  
17 somehow, the current Army field manual,  
18 you can only use psychological pressures,  
19 right, but you evoke that emotion, then  
20 you give them a way to act on the impulse  
21 that emotion creates by answering  
22 questions. So if what you're using is  
23 fear, you would give them a way to  
24 dissipate the fear by answering

1 questions.

2                   If it's anger and you think  
3 they're angry at someone, you give them a  
4 way to get back at that person by  
5 answering questions. If it's -- if it's  
6 that they sense they can no longer or  
7 they're having trouble organizing and  
8 executing the course of actions that are  
9 required to -- if you want them to  
10 believe that it's futile to continue to  
11 resist, right, you engender a little  
12 helplessness, or a sense of helplessness,  
13 I think is the way that I've used the  
14 term in the past, and then you give them  
15 a way out of that situation by answering  
16 questions.

17                   So the thing that you're  
18 trying to do is get that seeking to get  
19 out of this situation, not the end  
20 product, not the -- not the profound  
21 helplessness, not the pervasive  
22 personality change. Like for example --  
23 it's called in Pavlovian conditioning,  
24 condition neurosis, where a person