

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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| <p>MOHAMEDOU OULD SALAHI</p> <p style="text-align: center;">Petitioner/Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BARACK OBAMA, <i>et al.</i>,</p> <p style="text-align: center;">Respondents/Defendants.</p> | <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> | <p>Civil Action No. 1:05-0569 (RCL)</p> |
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DECLARATION OF LINDA MORENO, ESQ.

I, Linda Moreno, declare as follows:

1. I am a United States citizen and I live in New York, New York. I am over eighteen years old and I am prepared to testify to the facts stated herein, if called upon to do so.
2. I am one of the attorneys of record for Petitioner Mohamedou Ould Slahi.
3. I am submitting this declaration in response to the declaration of Colonel David E. Heath, which was filed in support of Respondents' Opposition to Petitioner's Motion to Show Cause.
4. I have been co-counsel for Mr. Slahi since 2009, and have visited with him several times at the Guantánamo Bay Naval Station. My most recent visit was on August 19-20, 2015.
5. During that visit I reviewed the unclassified version of Colonel Heath's declaration and its attachments with Mr. Slahi.

6. Mr. Slahi told me that he had never heard of the “Detainee Admin,” which Colonel Heath describes in his declaration at paragraph 6.
7. While I was meeting with Mr. Slahi we both asked the guards about the “Detainee Admin” that Colonel Heath describes in his declaration. Both guards stated they had never heard of “Detainee Admin.”
8. Mr. Slahi told me that he wrote to Colonel Heath in December 2014 specifically requesting the return of all his property. A Lt. Col. “Stu” told Mr. Slahi that Colonel Heath had approved the return of his property; however, Mr. Slahi still has not received the property.
9. On August 20, 2015, Mr. Slahi and I asked the guards to put in a request for the return of all legal materials, photographs, videos and books that were taken in October 2014.
10. I reviewed the three envelopes of legal materials that had been given to Mr. Slahi in April 2015. These materials are clearly marked that they are not to be left with Mr. Slahi. Mr. Slahi told me that he has repeatedly asked the guards to remove these documents from his cell, but they have not done so. Instead, Guantánamo personnel keep telling him his request is “pending.”

I declare under penalty of perjury, pursuant to the laws of the United States, that the foregoing is true and correct and that this declaration was executed on September 11, 2015, at Dallas, Texas.

/s/ Linda Moreno
Linda Moreno