

EXHIBIT 1

السفارة الامريكانيه
قسم القنصليه
انقرة / تركيا

التاريخ

عزيزي مقدم الطلب
بمقدّمك هذا الطلب يعفى عليك باستثرت الدبرعات للحصول على تأشيرة
السفر لغير الهجرة. إجراءاتنا تتطلب إجراءات إدارية إضافية والتي تستدعي
مدة اربعه الى ستة اسابيع، واهياناً تتطلب مدة اطول. الرجاء دراجعة
الرقم الاتي **RMT/φφ** على صفحة الانترنت. عند روثية الرقم هذا يعفى
إن الدبرعات الادارية قد اكتملت. الرجاء عدم الاتصال او كتابة رسالة
بالبريد الالكتروني للسؤال عن نكيتك.

الاشخاص المرافقين للمتقدم الرئيسي عليهم الحضور مع المتقدم الرئيسي او
بصحة، لكن لا يستطيعون القدوم قبل المتقدم الرئيسي حتى لو كان رقمهم موجود
على صفحة الانترنت. بمعنى آخر، الاشخاص المرافقين لا يستطيعون الحصول
على التأشيرة قبل المتقدم الرئيسي. على سبيل المثال: F2، L2، L و H4
لا يستطيعون الحصول على التأشيرة ما لم يحصل المتقدم الرئيسي (F1، L1، L و H1
على التأشيرة.

الرجاء زيارة موقعنا على الانترنت:
<http://ankara.usembassy.gov>

وبورها انظر على **Check Clearance Status** و (الزوج او الزوجة) القدوم الى السفارة
عند روثية الرقم على المتقدم الرئيسي و (الزوج او الزوجة) القدوم الى السفارة
اي يوم خميس ما بين الساعة 2:00 الى الساعة 2:30. للاجابة على اي
سؤال مسبقاً.

بعد طبع التأشير سنرسل دواز سفرك على عنوانك في تركيا. لتتوجه اي طريقاً
أفضل للحصول على دواز سفرك. الرجاء الاتصال بالـ (UPS) على الرقم التالي
00 33 444 (0-312) للاستفسار عن دواز السفر
الرجاء عدم دفع اجور التأشيرة مرة ثانية. في حالة دفعك، نحن بالإنابة
نقدم لك طبع ارقام اعمالك

المخلصين للخدمة
قسم القنصليه
انقرة / تركيا

PMT φφ



AMERICAN EMBASSY
CONSULAR SECTION
ANKARA-TURKEY

Date: 10/9/2008

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number _____ to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

Please visit our website at:
<http://ankara.usembassy.gov>,
then click on: "Check Clearance Status"

When your number appears on the website, please send your passport via the UPS courier service to the Embassy so that we may issue your visa.

In order to return your passport to the Embassy, please call UPS at 444 0033. If you have trouble reaching UPS, please dial 0 312 44 0033. The payment may be made in U.S. Dollars or Turkish Lira or by credit card.

After issuance of the visa, the passport will be delivered to your address in Turkey. There is **NO** other method of returning your passport. Please check with UPS to confirm delivery. If you have further questions on UPS service, please call UPS at the number shown above.

You should not pay the \$131 application fee again. If you pay for a second application fee unnecessarily, we regret that it can not be refunded.

Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008

سج

السفارة الامريكانيه
قسم القنصليه
انقرة / تركيا

التاريخ

عزيزي مقدم الطلب
بمقتضى هذا الطلب يعفى بانك باشرت الاجراءات للحصول على تأشيرة
السفر لغير الهجرة. الاجراءات تتطلب اجراءات ادارية اضافية والتي تستدعي
مدة اربعه اى ستة اسابيع، واما ما تتطلب مدة اطول. الرجاء مراجعه
الرقم الاتي ~~PMU~~ على صفحة الانترنت. عند روثية الرقم هذا يعفى
ان الاجراءات الادارية قد اكتملت. الرجاء عدم الاتصال او كتابة رسالة
بالبريد الالكتروني للسؤال عن نتيجتك.

الاشخاص المرافقين للمقدم الرئيسي عليهم الحضور مع المتقدم الرئيسي او
بدهم، لكن لا يستطيعون القدوم قبل المتقدم الرئيسي حتى لو كان رقمهم موجود
على صفحة الانترنت. بمعنى اخر، الاشخاص المرافقين لا يستطيعون الحصول
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لا يستطيعون الحصول على التأشيرة ما لم يحصل المتقدم الرئيسي (F1، L1 و H1
على التأشيرة.

الرجاء زيارة موقعنا على الانترنت:

<http://ankara.usembassy.gov>

و بعدها اضغط على "Check Clearance Status"

عند روثية الرقم على المتقدم الرئيسي و (الزوجه او الزوج) القدوم الى السفارة
اي يوم خميس ما بين الساعة 2:00 الى الساعة 2:30. للاجابة الى اي

موعد مسبق.
بعد طبع التأشير سترسل هواز سفرك على عنوانك في تركيا. لتوهداي طريقة
أفضل للحصول على هواز سفرك. الرجاء الاتصال بالـ (UPS) على الرقم التالي
00 33 444 (312-0) للاستفسار عن هواز السفر
الرجاء عدم دفع اجور التأشيرة مدة ثمانية. في حالة تفويت تأشيرة
بمقتضى طلب اجراءاتك

الخاصين الى
قسم القنصليه لغير المهاجرين



PMU 00

AMERICAN EMBASSY
CONSULAR SECTION
ANKARA-TURKEY

Date: 10/9/2008

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number PMU 00 to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

Please visit our website at:
<http://ankara.usembassy.gov>,
then click on: "Check Clearance Status"

When your number appears on the website, please send your passport via the UPS courier service to the Embassy so that we may issue your visa.

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You should not pay the \$131 application fee again. If you pay for a second application fee unnecessarily, we regret that it can not be refunded.

Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008

مستند رقم 1

PMV φφ

السفارة الامريكانيه
قسم القنصلية
انقرة / تركيا

التاريخ

عزيزي مهتم الطلب

بنته يهنا هذا الطلب يعف وانك باشرت الاجراءات للحصول على تأشيرة السفر لفر الهجرة. اجراءاتنا تتطلب اجراءات ادارية اضافيه والتي تستدعي مدة ايهة الى ستة اسابيع، واهياناً تتطلب مدة اطول. الرجاء فراجعه الرقم الاتي PMV.φφ على صفحة الانترنت. عند رويته الرقم هذا يعف ان الاجراءات الادارية قد اكتملت. الرجاء عدم الاتصال او كتابة رسالة بالبريد الالكتروني لسؤال عن نتيتك.

الاشخاص المرافقين للمتقدم الرئيسي عليهم الحضور مع المتقدم الرئيسي او بعده، لكن لا يستطيعون القدوم قبل المتقدم الرئيسي هو لو كان رقم موجود على صفحة الانترنت. بمعنى انهم الاشخاص المرافقين لا يستطيعون الحصول على التأشيرة قبل المتقدم الرئيسي. على سبيل المثال: F2، L2، L2 و H4 لا يستطيعون الحصول على التأشيرة ما لم يحصل المتقدم الرئيسي (F1، L1 و H1) على التأشيرة.

الرجاء زيارة موقعنا على الانترنت:

<http://ankara.usembassy.gov>.

و بورها اضغط على "Check Clearance Status" (الزوج او الزوجة) القدوم الى السفارة عند رويته الرقم على المتقدم الرئيسي و (الزوج او الزوجة) القدوم الى السفارة اي يوم خميس ما بين الساعة 2:00 الى الساعة 2:30. للاجابة الى اي

موقع مسبق. بعد طرح التأشير سترسل هواز سفرك على عنوانك في تركيا. لتوهد اي طريقة اخرى للحصول على هواز سفرك. الرجاء الاتصال بالـ (UPS) على الرقم التالي 00 33 444 (312-0) للاستفسار عن هواز السفر الرجاء عدم دفع اجور التأشيرة مرة ثانية. في حالة دفولك، تأسف للإخبار باننا لنستطيع ارجاعها لك.

الخلاصين التي
قسم القنصلية لفر الهاجرير



AMERICAN EMBASSY
CONSULAR SECTION
ANKARA-TURKEY

Date:

10/9/2008

Dear Applicant:

By submitting your application, you have begun the process of obtaining a nonimmigrant visa. Our procedures require additional administrative processing which takes a minimum of four to six weeks but can take longer. Please refer to the following number PMV00 to check your status on our website. Administrative processing has been completed when your number appears on the website. Please do not call or e-mail to inquire about your case.

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Sincerely,

Non-Immigrant Visa Section
Ankara, Turkey
February 06, 2008

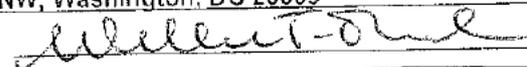


U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Approved OMB 1405-0018
Expires 11/30/2010
Estimated Burden 1 hour
See Page 2

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM

1. Passport Number G2080226		2. Place of Issuance: City Baghdad Country IRAQ State/Province Baghdad		DO NOT WRITE IN THIS SPACE B-1/B-2 MAX B-1 MAX B-2 MAX Other _____ MAX Visa Classification _____ Mult. or _____ Number of Applications _____ Months _____ Validity _____ Issued/Refused _____ On _____ By _____ Under SEC. 214(b) 221(g) Other _____ INA Reviewed By _____			
3. Issuing Country IRAQ		4. Issuance Date (dd-mm-yyyy) 23 JUNE 2008				5. Expiration Date (dd-mm-yyyy) 22 JUNE 2016	
6. Surnames (As in Passport) Shammari							
7. First and Middle Names (As in Passport) Suhail Najm Abdullah							
8. Other Surnames Used (Maiden, Religious, Professional, Aliases)							
9. Other First and Middle Names Used			10. Date of Birth (dd-mm-yyyy) 11 OCTOBER 1959				
11. Place of Birth: City Baghdad Country IRAQ State/Province Baghdad		12. Nationality IRAQ					
13. Sex <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	14. National Identification Number (if applicable) 00584507	15. Home Address (include apartment number, street, city, state or province, postal zone and country) Baghdad, Baghdad 10080 IRAQ					
16. Home Telephone Number [REDACTED]		Business Phone Number				Mobile/Cell Number [REDACTED]	
Fax Number		Business Fax Number		Pager Number			
17. Marital Status <input checked="" type="checkbox"/> Married <input type="checkbox"/> Single (Never Married) <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced <input type="checkbox"/> Separated		18. Spouse's Full Name (Even if divorced or separated, include maiden name.) [REDACTED]		19. Spouse's DOB (dd-mm-yyyy) 25 JANUARY 1962			
20. Name and Address of Present Employer or School Name: Al Seuti Secondary School Address: Al Mahmoudiya Al Latifiya District 32 Baghdad							
21. Present Occupation (If retired, write "retired". If student, write "student".) teacher		22. When Do You Intend To Arrive In The U.S.? (Provide specific date if known)		23. E-Mail Address [REDACTED]			
24. At What Address Will You Stay in The U.S.? 1718 20th Street NW Washington, DC 20009				 N1MI18HW5K DO NOT WRITE IN THIS SPACE 50 mm x 50 mm PHOTO staple or glue photo here			
25. Name and Telephone Numbers of Person in U.S. Who You Will Be Staying With or Visiting for Tourism or Business Name William O'Neil Home Phone _____ Business Phone 202-232-5504 Cell Phone _____							
26. How Long Do You Intend To Stay in The U.S.? one week		27. What is The Purpose of Your Trip? To appear as a witness in litigation					
28. Who Will Pay For Your Trip? Burke O'Neil LLC		29. Have You Ever Been in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ FOR HOW LONG? _____					

<p>30. Have You Ever Been Issued a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____</p>	<p>31. Have You Ever Been Refused a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____</p>																
<p>32. Do You Intend To Work in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If YES, give the name and complete address of U.S. employer.)</p>	<p>33. Do You Intend To Study in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If YES, give the name and complete address of the school.)</p>																
<p>34. Names and Relationships of Persons Traveling With You Taha Yaseen Arrak, no relation Asaad Hamzah Hanfoosh, no relation Salah Hasan Nsaif, no relation _____</p>																	
<p>35. Has Your U.S. Visa Ever Been Cancelled or Revoked? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>36. Has Anyone Ever Filed an immigrant Visa Petition on Your Behalf? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Who? _____</p>																
<p>37. Are Any of The Following Persons in The U.S., or Do They Have U.S. Legal Permanent Residence or U.S. Citizenship? Mark YES or NO and indicate that person's status in the U.S. (i.e., U.S. legal permanent resident, U.S. citizen, visiting, studying, working, etc.).</p> <table style="width:100%; border: none;"> <tr> <td style="width:25%;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> <td style="width:25%;">Husband/ Wife _____</td> <td style="width:25%;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> <td style="width:25%;">Fiance/ Fiancée _____</td> </tr> <tr> <td><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> <td>Father/ Mother _____</td> <td><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> <td>Son/ Daughter _____</td> </tr> <tr> <td colspan="2"></td> <td colspan="2" style="text-align: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> </tr> <tr> <td colspan="2"></td> <td colspan="2" style="text-align: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</td> </tr> </table>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Husband/ Wife _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fiance/ Fiancée _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Father/ Mother _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Son/ Daughter _____			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Husband/ Wife _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Fiance/ Fiancée _____														
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Father/ Mother _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Son/ Daughter _____														
		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															
		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															
<p>38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX FOR EACH ITEM. A visa may not be issued to persons who are within specific categories defined by law as inadmissible to the United States (except when a waiver is obtained in advance). Is any of the following applicable to you?</p> <ul style="list-style-type: none"> • Have you ever been arrested or convicted for any offense or crime, even though subject of a pardon, amnesty or other similar legal action? Have you ever unlawfully distributed or sold a controlled substance (drug), or been a prostitute or procurer for prostitutes? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO • Have you ever been refused admission to the U.S., or been the subject of a deportation hearing, or sought to obtain or assist others to obtain a visa, entry into the U.S., or any other U.S. immigration benefit by fraud or willful misrepresentation or other unlawful means? Have you attended a U.S. public elementary school on student (F) status or a public secondary school after November 30, 1996 without reimbursing the school? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO • Do you seek to enter the United States to engage in export control violations, subversive or terrorist activities, or any other unlawful purpose? Are you a member or representative of a terrorist organization as currently designated by the U.S. Secretary of State? Have you ever participated in persecutions directed by the Nazi government of Germany; or have you ever participated in genocide? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO • Have you ever violated the terms of a U.S. visa, or been unlawfully present in, or deported from, the United States? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO • Have you ever withheld custody of a U.S. citizen child outside the United States from a person granted legal custody by a U.S. court, voted in the United States in violation of any law or regulation, or renounced U.S. citizenship for the purpose of avoiding taxation? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO • Have you ever been afflicted with a communicable disease of public health significance or a dangerous physical or mental disorder, or ever been a drug abuser or addict? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <p>While a YES answer does not automatically signify ineligibility for a visa, if you answered YES you may be required to personally appear before a consular officer.</p>																	
<p>39. Was this Application Prepared by Another Person on Your Behalf? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If answer is YES, then have that person complete item 40.)</p>																	
<p>40. Application Prepared By: NAME: <u>Burke O'Neil LLC</u> Relationship to Applicant: <u>legal representative</u> ADDRESS: <u>1718 20th Street NW, Washington, DC 20009</u> Signature of Person Preparing Form: <u></u> DATE (dd-mm-yyyy) <u>07/10/08</u></p>																	
<p>41. I certify that I have read and understood all the questions set forth in this application and the answers I have furnished on this form are true and correct to the best of my knowledge and belief. I understand that any false or misleading statement may result in the permanent refusal of a visa or denial of entry into the United States. I understand that possession of a visa does not automatically entitle the bearer to enter the United States of America upon arrival at a port of entry if he or she is found inadmissible.</p> <p>APPLICANT'S SIGNATURE _____ DATE (dd-mm-yyyy) _____</p>																	
<p>Privacy Act and Paperwork Reduction Act Statements</p> <p>INA Section 222(f) provides that visa issuance and refusal records shall be considered confidential and shall be used only for the formulation, amendment, administration, or enforcement of the immigration, nationality, and other laws of the United States. Certified copies of visa records may be made available to a court which certifies that the information contained in such records is needed in a case pending before the court.</p> <p>Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.</p>																	



U.S. Department of State
SUPPLEMENT TO
NONIMMIGRANT VISA APPLICATION

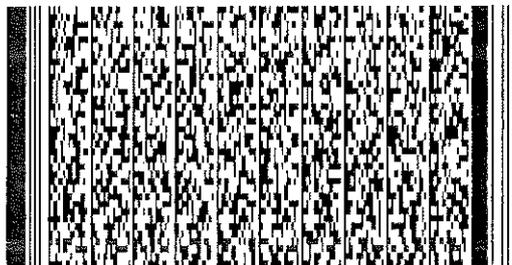
PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION

DO NOT MARK OR WRITE IN THIS SPACE

Suhail Najm Abdullah Shammari

Barcode Number: N1MI18HW5K

29. Additional Visits to the U.S.:
30. Additional Visa Issuances:
31. Additional Visa Refusals:



U.S. Department of State
SUPPLEMENTAL NONIMMIGRANT VISA APPLICATION

Approved OMB 1405-0134
 Expires 07/31/2005
 Estimated Burden 1 Hour

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM
 PLEASE ATTACH AN ADDITIONAL SHEET IF YOU NEED MORE SPACE TO CONTINUE YOUR ANSWERS

1. Last Name(s) <i>(List all Spellings)</i> Shammari		2. First Name(s) <i>(List all Spellings)</i> Suhail Najm Abdullah		3. Full Name <i>(In Native Alphabet)</i> سويل نسيم جابر	
4. Clan or Tribe Name <i>(If Applicable)</i> Shammari			5. Spouse's Full Name <i>(If Married)</i> [REDACTED]		
6. Father's Full Name [REDACTED]			7. Mother's Full Name [REDACTED]		
8. Full Name and Address of Contact Person or Organization in the United States <i>(Include Telephone Number)</i> William O'Neil 1718 20th Street NW Washington, DC 20009 telephone: 202-232-5504					
9. List All Countries You have Entered in the Last Ten Years <i>(Give the Year of Each Visit)</i> Turkey, 2008		10. List All Countries That Have Ever Issued You a Passport Iraq		11. Have You Ever Lost a Passport or Had One Stolen? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Not Including Current Employer, List Your Last Two Employers					
<u>Name</u>		<u>Address</u>		<u>Telephone No.</u>	
self-employed		Farmer		1993-2008	
Iraqi Army		Iraqi Reserve Officer		1983-1993	
13. List all Professional, Social and Charitable Organizations to Which You Belong (Belonged) or Contribute (Contributed) or with Which You Work (Have Worked) see attached			14. Do You Have Any Specialized Skills or Training, Including Firearms, Explosives, Nuclear, Biological, or Chemical Experience? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No IF YES, please explain		
15. Have You Ever Performed Military Service? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Give Name of Country, Branch of Service, Rank/Position, Military Specialty, and Dates of Service. Iraq, Iraqi Reserve Officer, Captain, artillery, 1983-1993					
16. Have You Ever Been in an Armed Conflict, Either as a Participant or Victim? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, please explain. Served as Iraqi Reserve Officer during Iraq/Iran War					
17. List All Educational Institutions You Attend or Have Attended. Include Vocational Institutions But Not Elementary Schools					
<u>Name of Institution</u>		<u>Address/Telephone No.</u>		<u>Course of Study</u>	
Baghdad University		Baghdad		College of Education/Mathematics Dept. 1979-1983	
Dimasq Secondary School		Al Qura, Baghdad		1976-1979	
Al Mahmoudiya Intermediate school		Al Mahmoudiya, Baghdad		1973-1976	
18. Have You Made Specific Travel Arrangements? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No IF YES, please provide a complete itinerary for your travel, including arrival/departure dates, flight information, specific location you will visit, and a point of contact at each location.					
Paperwork Reduction Act Statement					
*Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.					

Mandatory Iraq-Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate response is "None" or "No." Some questions are composite and require responses to each component of the question.

Question 3: Please write your name in Arabic here.

أحمد محمد جعفر

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment, and your job title for each job.

NAME OF EMPLOYER/ COMPANY/ LOCATION	YOUR JOB TITLE	DATES EMPLOYED FROM - TO
<i>Al Jenti Secondary School</i>	<i>teacher</i>	<i>2008 - present</i>
<i>Self-employed</i>	<i>farmer</i>	<i>1993-2008</i>
<i>Iraqi Army</i>	<i>Iraqi reserve officer</i>	<i>1983-1993</i>

Question 13: The Ba'ath Party is considered a professional organization. If you were ever a member of the Ba'ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

Joined the Ba'ath Party while in secondary school (1973). At that time, I believed that I could not get a job without being a member. I was a regular Party member.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served as an Iraqi Reserve Officer



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Approved OMB 1405-0018
Expires 11/30/2010
Estimated Burden 1 hour
See Page 2

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM

1. Passport Number G2258066		2. Place of Issuance: City: Baghdad Country: IRAQ State/Province: Baghdad		DO NOT WRITE IN THIS SPACE B-1/B-2 MAX B-1 MAX B-2 MAX Other _____ MAX Visa Classification _____ Mult or _____ Number of Applications _____ Months _____ Validity _____ Issued/Refused _____ On _____ By _____ Under SEC. 214(b) 221(g) Other _____ INA Reviewed By _____			
3. Issuing Country IRAQ		4. Issuance Date (dd-mm-yyyy) 18 AUGUST 2008				5. Expiration Date (dd-mm-yyyy) 17 AUGUST 2016	
6. Surnames (As in Passport) Arrak							
7. First and Middle Names (As in Passport) Taha Yaseen Arrak							
8. Other Surnames Used (Maiden, Religious, Professional, Aliases)							
9. Other First and Middle Names Used				10. Date of Birth (dd-mm-yyyy) 10 DECEMBER 1981			
11. Place of Birth: City: Baghdad Country: IRAQ State/Province: Baghdad		12. Nationality IRAQ					
13. Sex <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	14. National Identification Number (If applicable) 00817410	15. Home Address (Include apartment number, street, city, state or province, postal zone and country) Baghdad, Baghdad 10080 IRAQ					
16. Home Telephone Number		Business Phone Number		Mobile/Cell Number			
Fax Number		Business Fax Number		Pager Number			
17. Marital Status <input checked="" type="checkbox"/> Married <input type="checkbox"/> Single (Never Married) <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced <input type="checkbox"/> Separated		18. Spouse's Full Name (Even if divorced or separated. Include maiden name.) [REDACTED]		19. Spouse's DOB (dd-mm-yyyy) 10 JULY 1981			
20. Name and Address of Present Employer or School Name: self-employed Address: _____							
21. Present Occupation (If retired, write "retired". If student, write "student".) farmer		22. When Do You Intend To Arrive in The U.S.? (Provide specific date if known)		23. E-Mail Address [REDACTED]			
24. At What Address Will You Stay in The U.S. 1718 20th Street NW Washington, DC 20009				 X1M1XYTZY DO NOT WRITE IN THIS SPACE 50 mm x 50 mm PHOTO staple or glue photo here			
25. Name and Telephone Numbers of Person in U.S. Who You Will Be Staying With or Visiting for Tourism or Business Name: William O'Neil Home Phone: _____ Business Phone: 202-232-5504 Cell Phone: _____							
26. How Long Do You Intend To Stay in The U.S. one week		27. What is The Purpose of Your Trip? To appear as a witness in litigation					
28. Who Will Pay For Your Trip? Burke O'Neil LLC		29. Have You Ever Been in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ FOR HOW LONG? _____					

30. Have You Ever Been Issued a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____	31. Have You Ever Been Refused a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____
32. Do You Intend To Work in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If YES, give the name and complete address of U.S. employer.)</i>	33. Do You Intend To Study in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If YES, give the name and complete address of the school.)</i>

34. Names and Relationships of Persons Traveling With You
Suhail Najm Abdullah, no relation
Asaad Hamzah Hanfoosh, no relation
Salah Hasan Nsaif, no relation
[REDACTED]

35. Has Your U.S. Visa Ever Been Cancelled or Revoked? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	36. Has Anyone Ever Filed an immigrant Visa Petition on Your Behalf? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Who? _____
--	---

37. Are Any of The Following Persons in The U.S., or Do They Have U.S. Legal Permanent Residence or U.S. Citizenship?
 Mark YES or NO and indicate that person's status in the U.S. (i.e., U.S. legal permanent resident, U.S. citizen, visiting, studying, working, etc.).

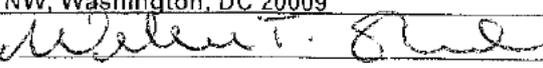
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Husband/Wife	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Fiancee/Fiancee	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Father/Mother	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Son/Daughter	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Brother/Sister

38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX FOR EACH ITEM.
 A visa may not be issued to persons who are within specific categories defined by law as inadmissible to the United States (except when a waiver is obtained in advance). Is any of the following applicable to you?

- Have you ever been arrested or convicted for any offense or crime, even though subject of a pardon, amnesty or other similar legal action? Have you ever unlawfully distributed or sold a controlled substance (drug), or been a prostitute or procurer for prostitutes? YES NO
- Have you ever been refused admission to the U.S., or been the subject of a deportation hearing, or sought to obtain or assist others to obtain a visa, entry into the U.S., or any other U.S. immigration benefit by fraud or willful misrepresentation or other unlawful means? Have you attended a U.S. public elementary school on student (F) status or a public secondary school after November 30, 1958 without reimbursing the school? YES NO
- Do you seek to enter the United States to engage in export control violations, subversive or terrorist activities, or any other unlawful purpose? Are you a member or representative of a terrorist organization as currently designated by the U.S. Secretary of State? Have you ever participated in persecutions directed by the Nazi government of Germany; or have you ever participated in genocide? YES NO
- Have you ever violated the terms of a U.S. visa, or been unlawfully present in, or deported from, the United States? YES NO
- Have you ever withheld custody of a U.S. citizen child outside the United States from a person granted legal custody by a U.S. court, voted in the United States in violation of any law or regulation, or renounced U.S. citizenship for the purpose of avoiding taxation? YES NO
- Have you ever been afflicted with a communicable disease of public health significance or a dangerous physical or mental disorder, or ever been a drug abuser or addict? YES NO

While a YES answer does not automatically signify ineligibility for a visa, if you answered YES you may be required to personally appear before a consular officer.

39. Was this Application Prepared by Another Person on Your Behalf? Yes No
 (If answer is YES, then have that person complete item 40.)

40. Application Prepared By:
 NAME: **Burke O'Neil LLC** Relationship to Applicant: **legal representative**
 ADDRESS: **1718 20th Street NW, Washington, DC 20009**
 Signature of Person Preparing Form:  DATE (dd-mm-yyyy): **07/10/08**

41. I certify that I have read and understood all the questions set forth in this application and the answers I have furnished on this form are true and correct to the best of my knowledge and belief. I understand that any false or misleading statement may result in the permanent refusal of a visa or denial of entry into the United States. I understand that possession of a visa does not automatically entitle the bearer to enter the United States of America upon arrival at a port of entry if he or she is found inadmissible.

APPLICANT'S SIGNATURE _____ DATE (dd-mm-yyyy) _____

Privacy Act and Paperwork Reduction Act Statements

INA Section 222(h) provides that visa issuance and refusal records shall be considered confidential and shall be used only for the formulation, amendment, administration, or enforcement of the immigration, nationality, and other laws of the United States. Certified copies of visa records may be made available to a court, which certifies that the information contained in such records is needed in a case pending before the court.

Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.



U.S. Department of State
SUPPLEMENT TO
NONIMMIGRANT VISA APPLICATION

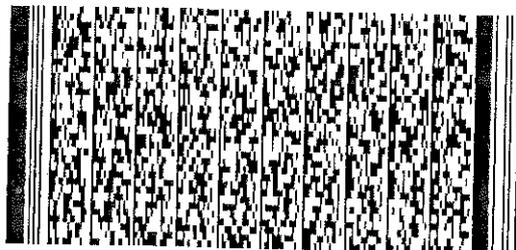
PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION

DO NOT MARK OR WRITE IN THIS SPACE

Taha Yaseen Arrak Arrak

Barcode Number: X1MI1XYTZY

29. Additional Visits to the U.S.:
30. Additional Visa Issuances:
31. Additional Visa Refusals:



U.S. Department of State
SUPPLEMENTAL NONIMMIGRANT VISA APPLICATION

Approved OMB 1465-0134
 Expires 07/31/2015
 Estimated Burden: 1 Hour*

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM
 PLEASE ATTACH AN ADDITIONAL SHEET IF YOU NEED MORE SPACE TO CONTINUE YOUR ANSWERS

1. Last Name(s) <i>(Last all Spellings)</i> Arrak	2. First Name(s) <i>(Last all Spellings)</i> Taha Yaseen Arrak	3. Full Name <i>(In Native Alphabet)</i> تاهة ياسين اراک												
4. Clan or Tribe Name <i>(If Applicable)</i> Al Ghurairi	5. Spouse's Full Name <i>(If Married)</i> [REDACTED]													
6. Father's Full Name [REDACTED]	7. Mother's Full Name [REDACTED]													
8. Full Name and Address of Contact Person or Organization in the United States <i>(Include Telephone Number)</i> William O'Neil 1718 20th Street NW Washington, DC 20009 telephone: 202-232-5504														
9. List All Countries You have Entered in the Last Ten Years <i>(Give the Year of Each Visit)</i> Turkey, 2008	10. List All Countries That Have Ever Issued You a Passport Iraq	11. Have You Ever Lost a Passport or Had One Stolen? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No												
12. Not Including Current Employer, List Your Last Two Employers <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Name</th> <th style="text-align: left; border-bottom: 1px solid black;">Address</th> <th style="text-align: left; border-bottom: 1px solid black;">Telephone No.</th> <th style="text-align: left; border-bottom: 1px solid black;">Job Title</th> <th style="text-align: left; border-bottom: 1px solid black;">Supervisor's Name</th> <th style="text-align: left; border-bottom: 1px solid black;">Dates of Employment</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="padding: 5px;">Self-employed farmer; no other previous employers</td> </tr> </tbody> </table>			Name	Address	Telephone No.	Job Title	Supervisor's Name	Dates of Employment	Self-employed farmer; no other previous employers					
Name	Address	Telephone No.	Job Title	Supervisor's Name	Dates of Employment									
Self-employed farmer; no other previous employers														
13. List all Professional, Social and Charitable Organizations to Which You Belong (Belonged) or Contribute (Contributed) or with Which You Work (Have Worked)	14. Do You Have Any Specialized Skills or Training, Including Firearms, Explosives, Nuclear, Biological, or Chemical Experience? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please explain													
15. Have You Ever Performed Military Service? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Give Name of Country, Branch of Service, Rank/Position, Military Specialty, and Dates of Service. Iraq, Compulsory Service, soldier, no specialty, Sept. 1999 - 2003														
16. Have You Ever Been in an Armed Conflict, Either as a Participant or Victim? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please explain.														
17. List All Educational Institutions You Attend or Have Attended. Include Vocational Institutions But Not Elementary Schools. <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Name of Institution</th> <th style="text-align: left; border-bottom: 1px solid black;">Address/Telephone No.</th> <th style="text-align: left; border-bottom: 1px solid black;">Course of Study</th> <th style="text-align: left; border-bottom: 1px solid black;">Dates of Attendance</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="padding: 5px;">No education above elementary school (Al Ruashid Primary School)</td> </tr> </tbody> </table>			Name of Institution	Address/Telephone No.	Course of Study	Dates of Attendance	No education above elementary school (Al Ruashid Primary School)							
Name of Institution	Address/Telephone No.	Course of Study	Dates of Attendance											
No education above elementary school (Al Ruashid Primary School)														
18. Have You Made Specific Travel Arrangements? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please provide a complete itinerary for your travel, including arrival/departure dates, flight information, specific location you will visit, and a point of contact at each location														

Paperwork Reduction Act Statement

*Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.

Mandatory Iraq - Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate response is "None" or "No." Some questions are composite and require responses to each component of the question.

Question 3: Please write your name in Arabic here.

عليه قنصله

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment, and your job title for each job.

NAME OF EMPLOYER/COMPANY/LOCATION	YOUR JOB TITLE	DATES EMPLOYED FROM - TO
<i>Self-employed</i>	<i>farmer</i>	<i>1993-present</i>

Question 13: The Ba'ath Party is considered a professional organization. If you were ever a member of the Ba'ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

I joined the Ba'ath Party in 2000 and was a member at the lowest level (Muayid). During Saddam Hussein's regime, every soldier in compulsory service had to join the Ba'ath Party.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served in Iraqi military



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Approved OMB 1405-0018
Expires 11/30/2010
Estimated Burden 1 hour
See Page 2

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM					
1. Passport Number G2339256		2. Place of Issuance: City Baghdad Country IRAQ State/Province Baghdad		DO NOT WRITE IN THIS SPACE B-1/B-2 MAX B-1 MAX B-2 MAX Other _____ MAX Visa Classification _____	
3. Issuing Country IRAQ		4. Issuance Date (dd-mm-yyyy) 14 SEPTEMBER 2008		5. Expiration Date (dd-mm-yyyy) 13 SEPTEMBER 2016	
6. Surnames (As in Passport) Alnamri				Mult or _____ Number of Applications _____ Months _____ Validity _____ Issued/Refused _____ On _____ By _____	
7. First and Middle Names (As in Passport) Asaad Hamza Hanfoosh				Under SEC. 214(b) 221(g) _____	
8. Other Surnames Used (Maiden, Religious, Professional, Aliases)				Other _____ INA _____ Reviewed By _____	
9. Other First and Middle Names Used			10. Date of Birth (dd-mm-yyyy) 01 JULY 1973		
11. Place of Birth: City Baghdad Country IRAQ State/Province Baghdad		12. Nationality IRAQ			
13. Sex <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female		14. National Identification Number (if applicable) 01145055		15. Home Address (include apartment number, street, city, state or province, postal zone and country) Baghdad, Baghdad 10080 IRAQ	
16. Home Telephone Number [REDACTED] Fax Number _____		Business Phone Number [REDACTED] Business Fax Number _____		Mobile/Cell Number [REDACTED] Pager Number _____	
17. Marital Status <input checked="" type="checkbox"/> Married <input type="checkbox"/> Single (Never Married) <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced <input type="checkbox"/> Separated		18. Spouse's Full Name (Even if divorced or separated. Include maiden name.) [REDACTED]		19. Spouse's DOB (dd-mm-yyyy) 01 MAY 1972	
20. Name and Address of Present Employer or School Name: self-employed Address: _____					
21. Present Occupation (if retired, write "retired". If student, write "student".) livestock seller			22. When Do You Intend To Arrive in The U.S.? (Provide specific date if known)		23. E-Mail Address [REDACTED]
24. At What Address Will You Stay in The U.S.? 1718 20th Street NW Washington, DC 20009				 E1M11FPRS8 DO NOT WRITE IN THIS SPACE 50 mm x 50 mm PHOTO staple or glue photo here	
25. Name and Telephone Numbers of Person in U.S. Who You Will Be Staying With or Visiting for Tourism or Business Name William O'Neil Home Phone _____ Business Phone 202-232-5504 Cell Phone _____					
26. How Long Do You Intend To Stay in The U.S.? one week		27. What is The Purpose of Your Trip? To appear as a witness in litigation			
28. Who Will Pay For Your Trip? Burke O'Neil LLC		29. Have You Ever Been in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ FOR HOW LONG? _____			

30. Have You Ever Been Issued a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____	31. Have You Ever Been Refused a U.S. Visa? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No WHEN? _____ WHERE? _____ WHAT TYPE OF VISA? _____
32. Do You Intend To Work in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If YES, give the name and complete address of U.S. employer.)	33. Do You Intend To Study in The U.S.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If YES, give the name and complete address of the school.)

34. Names and Relationships of Persons Traveling With You
 Suhail Najm Abdullah, no relation
 Taha Yaseen Arrak, no relation
 Salah Hasan Nsaif, no relation

35. Has Your U.S. Visa Ever Been Cancelled or Revoked? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	36. Has Anyone Ever Filed an immigrant Visa Petition on Your Behalf? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Who? _____
--	--

37. Are Any of The Following Persons in The U.S., or Do They Have U.S. Legal Permanent Residence or U.S. Citizenship?
 Mark YES or NO and indicate that person's status in the U.S. (i.e., U.S. legal permanent resident, U.S. citizen, visiting, studying, working, etc.).

<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Husband/Wife _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Fiancee/Fiances _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO _____
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Father/Mother _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Son/Daughter _____	Brother/Sister _____

38. IMPORTANT: ALL APPLICANTS MUST READ AND CHECK THE APPROPRIATE BOX FOR EACH ITEM.
 A visa may not be issued to persons who are within specific categories defined by law as inadmissible to the United States (except when a waiver is obtained in advance). Is any of the following applicable to you?

- Have you ever been arrested or convicted for any offense or crime, even though subject of a pardon, amnesty or other similar legal action? Have you ever unlawfully distributed or sold a controlled substance (drug), or been a prostitute or procurer for prostitutes? YES NO
- Have you ever been refused admission to the U.S., or been the subject of a deportation hearing, or sought to obtain or assist others to obtain a visa, entry into the U.S., or any other U.S. immigration benefit by fraud or willful misrepresentation or other unlawful means? Have you attended a U.S. public elementary school on student (F) status or a public secondary school after November 30, 1998 without reimbursing the school? YES NO
- Do you seek to enter the United States to engage in export control violations, subversive or terrorist activities, or any other unlawful purpose? Are you a member or representative of a terrorist organization as currently designated by the U.S. Secretary of State? Have you ever participated in persecutions directed by the Nazi government of Germany; or have you ever participated in genocide? YES NO
- Have you ever violated the terms of a U.S. visa, or been unlawfully present in, or deported from, the United States? YES NO
- Have you ever withheld custody of a U.S. citizen child outside the United States from a person granted legal custody by a U.S. court, voted in the United States in violation of any law or regulation, or renounced U.S. citizenship for the purpose of avoiding taxation? YES NO
- Have you ever been afflicted with a communicable disease of public health significance or a dangerous physical or mental disorder, or ever been a drug abuser or addict? YES NO

While a YES answer does not automatically signify ineligibility for a visa, if you answered YES you may be required to personally appear before a consular officer.

39. Was this Application Prepared by Another Person on Your Behalf? Yes No
 (If answer is YES, then have that person complete item 40.)

40. Application Prepared By:
 NAME: Burke O'Neil LLC Relationship to Applicant: legal representative
 ADDRESS: 1718 20th Street NW, Washington, DC 20009
 Signature of Person Preparing Form: [Signature] DATE (dd-mm-yyyy) 07/10/2008

41. I certify that I have read and understood all the questions set forth in this application and the answers I have furnished on this form are true and correct to the best of my knowledge and belief. I understand that any false or misleading statement may result in the permanent refusal of a visa or denial of entry into the United States. I understand that possession of a visa does not automatically entitle the bearer to enter the United States or America upon arrival at a port of entry if he or she is found inadmissible.

APPLICANT'S SIGNATURE _____ DATE (dd-mm-yyyy) _____

Privacy Act and Paperwork Reduction Act Statements

INA Section 222(f) provides that visa issuance and refusal records shall be considered confidential and shall be used only for the formulation, amendment, administration, or enforcement of the immigration, nationality, and other laws of the United States. Certified copies of visa records may be made available to a court which certifies that the information contained in such records is needed in a case pending before the court.

Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.



U.S. Department of State
SUPPLEMENT TO
NONIMMIGRANT VISA APPLICATION

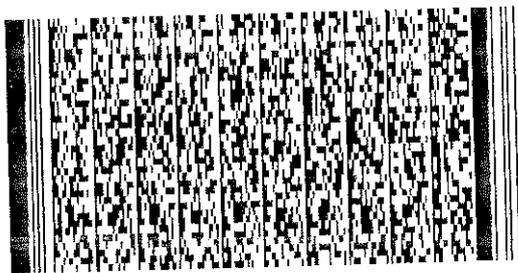
PLEASE BE SURE TO SUBMIT THIS PAGE WITH THE REST OF YOUR APPLICATION

DO NOT MARK OR WRITE IN THIS SPACE

Asaad Hamzah Hanfoosh Alnamri

Barcode Number: E1MI1FPRS8

29. Additional Visits to the U.S.:
30. Additional Visa Issuances:
31. Additional Visa Refusals:



U.S. Department of State
SUPPLEMENTAL NONIMMIGRANT VISA APPLICATION

Approved OMB 1465-0134
 Expires 07/31/2005
 Estimated Burden 1 Hour*

PLEASE TYPE OR PRINT YOUR ANSWERS IN THE SPACE PROVIDED BELOW EACH ITEM
 PLEASE ATTACH AN ADDITIONAL SHEET IF YOU NEED MORE SPACE TO CONTINUE YOUR ANSWERS

1. Last Name(s) <i>(List all Spellings)</i> Alnamri	2. First Name(s) <i>(List all Spellings)</i> Asaad Hamzah Hanfoash	3. Full Name <i>(In Naive Alphabet)</i> أساد حمزة هانفوش																		
4. Clan or Tribe Name <i>(If Applicable)</i> Alnamri	5. Spouse's Full Name <i>(If Married)</i> [REDACTED]																			
6. Father's Full Name [REDACTED]	7. Mother's Full Name [REDACTED]																			
8. Full Name and Address of Contact Person or Organization in the United States <i>(Include Telephone Number)</i> William O'Neil 1718 20th Street NW Washington, DC 20009 telephone: 202-232-5504																				
9. List All Countries You have Entered in the Last Ten Years <i>(Give the Year of Each Visit)</i> Turkey, 2008	10. List All Countries That Have Ever Issued You a Passport Iraq	11. Have You Ever Lost a Passport or Had One Stolen? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																		
12. Not Including Current Employer, List Your Last Two Employers <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:25%;">Name</th> <th style="width:25%;">Address</th> <th style="width:15%;">Telephone No.</th> <th style="width:15%;">Job Title</th> <th style="width:15%;">Supervisor's Name</th> <th style="width:20%;">Dates of Employment</th> </tr> </thead> <tbody> <tr> <td>self-employed</td> <td>Baghdad</td> <td>N/A</td> <td>taxi driver</td> <td>N/A</td> <td>1990-1993</td> </tr> <tr> <td colspan="6">no previous job</td> </tr> </tbody> </table>			Name	Address	Telephone No.	Job Title	Supervisor's Name	Dates of Employment	self-employed	Baghdad	N/A	taxi driver	N/A	1990-1993	no previous job					
Name	Address	Telephone No.	Job Title	Supervisor's Name	Dates of Employment															
self-employed	Baghdad	N/A	taxi driver	N/A	1990-1993															
no previous job																				
13. List all Professional, Social and Charitable Organizations to Which You Belong (Belonged) or Contribute (Contributed) or with Which You Work <i>(Have Worked)</i> see attached		14. Do You Have Any Specialized Skills or Training, Including Firearms, Explosives, Nuclear, Biological, or Chemical Experience? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please explain																		
15. Have You Ever Performed Military Service? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Give Name of Country, Branch of Service, Rank/Position, Military Specialty, and Dates of Service. Iraq, Compulsory service, soldier, no speciality, 1991-1994																				
16. Have You Ever Been in an Armed Conflict, Either as a Participant or Victim? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please explain.																				
17. List All Educational Institutions You Attend or Have Attended. Include Vocational Institutions But Not Elementary Schools <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:40%;">Name of Institution</th> <th style="width:30%;">Address/Telephone No.</th> <th style="width:30%;">Course of Study</th> <th style="width:10%;">Dates of Attendance</th> </tr> </thead> <tbody> <tr> <td colspan="4">No education above elementary school</td> </tr> </tbody> </table>			Name of Institution	Address/Telephone No.	Course of Study	Dates of Attendance	No education above elementary school													
Name of Institution	Address/Telephone No.	Course of Study	Dates of Attendance																	
No education above elementary school																				
18. Have You Made Specific Travel Arrangements? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please provide a complete itinerary for your travel, including arrival/departure dates, flight information, specific location you will visit, and a point of contact at each location																				

Paperwork Reduction Act Statement

*Public reporting burden for this collection of information is estimated to average 1 hour per response, including time required for searching existing data sources, gathering the necessary data, providing the information required, and reviewing the final collection. You do not have to provide the information unless this collection displays a currently valid OMB number. Send comments on the accuracy of this estimate of the burden and recommendations for reducing it to: U.S. Department of State, A/RPS/DIR, Washington, DC 20520.

Mandatory Iraq - Specific Supplemental Visa Form

In order to ensure prompt processing of your visa application, please be as detailed as possible in completing the Supplemental Nonimmigrant Visa Application (DS-157) in order to prevent delays in processing your application. Please do not leave any questions blank. If a question does not apply to you, indicate "N/A." Do not answer questions "N/A" if the appropriate response is "None" or "No." Some questions are composite and require responses to each component of the question.

Question 3: Please write your name in Arabic here.

محمد جواد

Question 12: Please list all of your employers since you completed your studies and provide the dates for this employment, and your job title for each job.

NAME OF EMPLOYER/COMPANY/LOCATION	YOUR JOB TITLE	DATES EMPLOYED FROM - TO
Self-employed	livestock seller	1993-present
Self-employed	taxi driver	1990-1993

Question 13: The Ba'ath Party is considered a professional organization. If you were ever a member of the Ba'ath Party, please indicate it in response to this question. If you were a member, please explain when and why you joined, and the highest Party level you achieved. If not, please explain how you avoided Party membership.

I was not a Ba'ath Party member because no one forced me to affiliate.

Question 15: If you are a male and have not performed military service, please explain how you avoided mandatory military service in Iraq.

N/A - served in Iraqi military

EXHIBIT 2

Baher Azmy

From: Koegel, William <WKoegel@steptoe.com>
Sent: Friday, December 21, 2012 11:04 AM
To: sburke@burkepllc.com; Baher Azmy
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: FW: Plaintiffs' Depositions

Baher: The Plaintiffs do not get to decide that they're going to appear, if they appear at all, only at some indeterminate time close to the end of discovery. Given the issuance of the Court of Appeals' decision in May 2012, and our subsequent discussions with Susan, the Plaintiffs cannot reasonably or credibly claim that they need another three or four months to appear for depositions in the E.D. Va. – which is the location we have always specified and where Susan acknowledged they would appear. Your refusal to provide any information about the Plaintiffs' efforts to obtain visas means that they've been either dilatory or unsuccessful. Neither explanation is satisfactory. We'll proceed with appropriate action so that the Court can address the matter.

William Koegel
Partner
WKoegel@steptoe.com

Steptoe

+1 202 429 6408 direct Steptoe & Johnson LLP
+1 202 441 6100 mobile 1330 Connecticut Avenue, NW
+1 202 261 0583 fax Washington, DC 20036
www.steptoe.com

From: Baher Azmy [<mailto:BAzmy@ccrjustice.org>]
Sent: Thursday, December 20, 2012 10:54 PM
To: Koegel, William; sburke@burkepllc.com
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: RE: Plaintiffs' Depositions

Bill,

I am traveling this week but reviewed your message.

In short, we regard your demand that counsel provide an accounting of our efforts to obtain visas as wholly inappropriate. We also take strong exception to your apparent suggestion that the 8 years delay in proceeding to the merits of this case is somehow attributable to Plaintiffs. In any event, we are in the process of obtaining visas for the plaintiffs (the outcome and timing of which, as you know, are not fully within Plaintiffs control), and we fully intend to make them available in E.D.Va for depositions before the conclusion of the discovery period. As I believe Susan informed you, we could also make them available earlier, in Istanbul.

I will be back in the office on December 27, if you wish to speak further about this or other matters.

Thank you,

Baher

From: Koegel, William [WKoegel@step toe.com]
Sent: Wednesday, December 19, 2012 4:12 PM
To: sburke@burkepllc.com; Baher Azmy
Cc: ssajadi@burkepllc.com; O'Connor, John
Subject: Plaintiffs' Depositions

Susan/Baher:

We were surprised, and quite concerned, to learn that the Plaintiffs claim that they cannot appear for depositions in the E.D. Va. until March - or later. Susan had previously advised that not only was she certain that the Plaintiffs could enter this country for their depositions, but that she had taken steps to facilitate that. After more than eight (8) years of litigation (including the time the Plaintiffs claim they were members of the putative class in *Saleh*), they cannot reasonably assert they need at least another three months before appearing for depositions. They cannot avail themselves of the E.D. Va. forum while simultaneously refusing to appear timely for depositions.

Please let us know, specifically and in detail, exactly what Plaintiffs and their counsel have done for Plaintiffs to be able to appear in this country in this action and when each action was taken. We need that information, at a minimum, to determine how to proceed. We would appreciate receiving that information by week's end.

William Koegel
Partner
WKoegel@step toe.com

Step toe

+1 202 429 6408 direct Steptoe & Johnson LLP
+1 202 441 6100 mobile 1330 Connecticut Avenue, NW
+1 202 261 0583 fax Washington, DC 20036
www.step toe.com

EXHIBIT 3



Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002T5NWP

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

	الاسم العرقي:	NSAIF, SALAH HASSAN	الموقع الذي تم اختياره:
	تاريخ الميلاد:	██████████ 1971	DOH
	محل الميلاد:	DIYALA, IRAQ	U. S. Embassy Doha
	الجنس:	Male	P. O. Box 2399
	الجنسية:	IRAQ	Doha, Qatar
	رقم جواز السفر:	██████████	
	الغرض من السفر:	BUSINESS/PERSONAL (B1/B2)	
	تاريخ إستكمال الطلب:	25 DEC 2012	
رقم التأكيد:	AA002T5NWP		Version 01.02.00

هذه ليست تأشيرة

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة



AA002T5NWP

Instructions

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة بطلب التأشيرة. يرجى مراجعة الخاص البلاد جدول العوالم بالمثل لأى رسوم يمكن مطالبتك بتسديدها

إلى <http://usembassy.state.gov> أو <http://travel.state.gov> إذا كان لديك أسئلة إضافية، أو للإسقلال حول كيفية الإتصال بالفتصليية، براءا الذهاب إلى

ملحوظة: ما لم تكن موفى من المقابلة، سيحتتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول فتصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت موفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. AM EST. لقد وقفت إستمارتك إلكترونياً في 2012/25/12 1:46:31. توقيعك الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك (U.S.C. 1746) للمسؤولية تحت طائلة القانون. (28

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من الممل أو غيرها من أغراض القانون في الولايات المتحدة

EXHIBIT 4

centerforconstitutionalrights
on the front lines for social justice

December 27, 2012

VIA E-MAIL

Embassy of the United States of America Doha
Consular Section
22nd February Street
Al Luqta District
P.O. Box 2399
Doha, Qatar
nivconsulardoha@state.gov

Re: Non-immigrant Visa for Salah Hassan Nsaif (Application No. AA002T5NWP) to Appear as a Witness in *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Nsaif (Application No. AA002T5NWP) and to respectfully request the expedited processing of this application by your office. Mr. Nsaif is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Nsaif was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

The case is now proceeding with discovery. A copy of the court's discovery order is attached hereto as Exhibit C.

Mr. Nsaif is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Nsaif to the United States on two occasions: First, Mr. Nsaif has been requested to appear for deposition in January 2013. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Nsaif fails to appear, there may be serious consequences, up to and including dismissal of his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of

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torture against the defendant should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI, Int'l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Nsaif, who has family and employment in Qatar, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures

EXHIBIT 5



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002TFJXF

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

Photo Not Provided

الاسم المعطى: SHAMMARI, SUHAIL NAJM
ABDULLAH
1959
محل الميلاد: BAGHDAD, IRAQ
الجنس: Male
الجنسية: IRAQ
رقم جواز السفر: [REDACTED]
الغرض من السفر: BUSINESS/PERSONAL
(B1/B2)
تاريخ إستكمال الطلب: 31 DEC 2012
رقم التأكيد: AA002TFJXF

الموقع الذي تم اختياره:

BGH
U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

Version 01.02.00

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AA002TFJXF

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة بطلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالمثل لأي رسوم يمكن مطالبتك بتسديدها

أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى <http://travel.state.gov> .

ملحوظة : الصورة التي قدمت مع طلب التأشيرة لا تتقابل مع معايير الجودة المحددة في تعليمات الصورة لمقدمي طلبات التأشيرات. الرجاء أخذ صور جديدة والتي تتفق على وجه التحديد مع التعليمات التالية <http://travel.state.gov>.

ملحوظة: ما لم تكن معفى من المقابلة، سيحتج عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك

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المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002TFPTZ

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

Photo Not Provided

الاسم المعطى: ARRAK, TAHA YASEEN
[REDACTED] 1981
محل الميلاد: BAGHDAD, IRAQ
الجنس: Male
الجنسية: IRAQ
رقم جواز السفر: [REDACTED]
الغرض من السفر: BUSINESS/PERSONAL (B1/B2)
تاريخ إستكمال الطلب: 31 DEC 2012
رقم التأكيد: AA002TFPTZ

الموقع الذي تم اختياره:

BGH
U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

Version 01.02.00

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AA002TFPTZ

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أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى

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<http://travel.state.gov>.

ملحوظة: ما لم تكن معفى من المقابلة، سيتحتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك.

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت معفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. توقيعك AM EST. لقد وقعت إستمارتك إلكترونياً في 2012/31/12 2:53:10 الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك للمسؤولية تحت طائلة (U.S.C. 1746 القانون.) 28

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة.



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002TFNAZ

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

<input checked="" type="checkbox"/> Photo Not Provided	الاسم المعطى: ALNAMRI, ASAAD HAMZAH HANFOOSH	الموقع الذي تم اختياره: BGH U.S. Embassy Baghdad Al Kindi Street International Zone Baghdad, Iraq
	1973	
محل الميلاد: BAGHDAD, IRAQ		
الجنس: Male		
الجنسية: IRAQ		
رقم جواز السفر: [REDACTED]		
الغرض من السفر: BUSINESS/PERSONAL (B1/B2)		
تاريخ إستكمال الطلب: 31 DEC 2012		
رقم التأكيد: AA002TFNAZ		
		Version 01.02.00

هذه ليست تأشيرة

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة



AA002TFNAZ

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة طلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالممثل لأي رسوم يمكن مطالبتك بتسديدها

أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى

<http://travel.state.gov> .

ملحوظة : الصورة التي قدمت مع طلب التأشيرة لا تتقابل مع معايير الجودة المحددة في تعليمات الصورة لمقدمي طلبات التأشيرات. الرجاء أخذ صور جديدة والتي تتفق على وجه التحديد مع التعليمات التالية:

<http://travel.state.gov>.

ملحوظة: ما لم تكن معفى من المقابلة، سيحتتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك.

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت معفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. توقيعك AM EST. لقد وقعت إستمارتك إلكترونياً في 2012/31/12 2:00:13 الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك للمسؤولية تحت طائلة (U.S.C. 1746 القانون.) 28

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة.

EXHIBIT 6



Doha (DOH)
P.O. Box 2399
Doha, Qatar

NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: **Ssz41ziVbs**

Appointment Date: **Wednesday, January 09, 2013**

Appointment Time: **7:30:00 AM**

Surname: **NSAIF**

Given Names: **SALAH HASSAN**

Passport Number: **[REDACTED]**

Barcode Number: **AA002T5NWP**

Telephone Number: **+974-66-74-6141**

Email Address: **malomari@umich.edu**

Receipt Number: **AA002T5NWP**

Thank you for scheduling your appointment for your non-immigrant visa interview. Please appear at the U.S. Embassy in Doha not more than 30 minutes before your scheduled time.

NOTE: The appointed time is not the time you will be interviewed. You should anticipate a wait of two hours from the time you arrive until completion of the interview process.

The nonimmigrant visa application fee must be paid through Commercial Bank of Qatar. Please be sure to bring your yellow Commercial Bank receipt, application confirmation page, passport, and photo to your interview.

We look forward to seeing you at the Consular Section of the U.S. Embassy in Doha.

- Photos must be
- Photos must measure

printed on a white background.

- Colored or patterned backgrounds are unacceptable. Photos must have been taken within the last six months.
- Photos must show the applicant facing straight ahead, looking neither down nor to the side, with the applicant's head centered in the frame and ears exposed.



50 mm. The applicant's head (measured from top of the hair to the bottom of the chin) must measure 25 mm to 35 mm. The applicant's eye level must be 28 mm to 35 mm from the bottom of the photo.

- Photos must be stapled to the application form. The staples cannot touch the applicant's face.



United States Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: **Tcm56oyBbs**

Appointment Date: **Wednesday, January 23, 2013**

Appointment Time: **7:30:00 AM**

Surname: **ALNAMRI**

Given Names: **ASAAD HAMZAH HANFOOSH**

Passport Number: **[REDACTED]**

Barcode Number: **AA002TFNAZ**

Telephone Number: **9647902562813**

Email Address: **malomari@umich.edu**

YOU MUST SCHEDULE AN INTERVIEW APPOINTMENT AT:
http://iraq.usembassy.gov/iraq/b_visas.html





United States Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: **Qit66yoVuv**

Appointment Date: **Wednesday, January 23, 2013**

Appointment Time: **7:30:00 AM**

Surname: **SHAMMARI**

Given Names: **SUHAIL NAJM ABDULLAH**

Passport Number: **[REDACTED]**

Barcode Number: **AA002TFJXF**

Telephone Number: **9647904931943**

Email Address: **malomari@umich.edu**

YOU MUST SCHEDULE AN INTERVIEW APPOINTMENT AT:
http://iraq.usembassy.gov/iraq/b_visas.html





United States Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

NIV Appointment System - Appointment Confirmation

PLEASE PRINT THIS PAGE FOR YOUR RECORD

Confirmation ID: **Khm26frZtr**

Appointment Date: **Wednesday, January 23, 2013**

Appointment Time: **7:30:00 AM**

Surname: **ARRAK**

Given Names: **TAHA YASEEN**

Passport Number: **[REDACTED]**

Barcode Number: **AA002TFPTZ**

Telephone Number: **9647818549881**

Email Address: **malomari@umich.edu**

YOU MUST SCHEDULE AN INTERVIEW APPOINTMENT AT:
http://iraq.usembassy.gov/iraq/b_visas.html



EXHIBIT 7



January 9, 2013

William Koegel, Jr.
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Bill,

Plaintiffs are in receipt of the December 28, 2012, Notices of Depositions of Plaintiffs Suhail Al Shimari, Taha Rashid, Asa'ad Al-Zubae'e and Salah Al-Ejaili to appear for depositions on dates we understand to be January 29, 2013, January 30, 2013, January 31, 2013 and February 1, 2013, respectively (the "Notices of Deposition").

Plaintiffs object to the Notices of Deposition. Plaintiffs are not currently available to appear in Arlington, Virginia on the dates noticed because they cannot guarantee that they will have received their visas to travel to the United States by those dates. As previously discussed, Plaintiffs are making diligent efforts to secure visas to the United States. As of this date, all Plaintiffs are scheduled to complete interviews by U.S. officials at their respective U.S. Embassy by January 24, 2013 – a date too close to the proposed depositions to ensure their availability. We will inform you as soon as we know whether their visas have been granted, and will work to schedule depositions in the Eastern District of Virginia in a time frame reasonably thereafter. As I mentioned to you, all Plaintiffs remain available to appear on relatively short notice for depositions in Erbil, Iraq or Istanbul, Turkey.

Although Plaintiffs have every expectation of submitting to depositions prior to the scheduled end of fact discovery, Plaintiffs would not object to a request to the Court to enlarge the discovery schedule for a reasonable time if Defendants believe that is necessary on account of the scheduling of Plaintiffs' depositions.

Very truly yours,

/s/ Baher Azmy

Baher Azmy
Legal Director

EXHIBIT 8

centerforconstitutionalrights
on the front lines for social justice

February 15, 2013

Sent via E-mail and Federal Express

Michael Posner
Assistant Secretary of State
Bureau of Democracy, Human Rights, and Labor
U.S. Department of State
2201 C Street NW
Washington, DC 20520
PosnerMH@state.gov

Re: Non-immigrant Visas for Taha Yaseen Arrak (Application No. CEACAA002TFPTZ), Asaad Hamzah Hanfoosh Alnamri (Application No. CEACAA002TFNAZ), and Suhail Najm Abdullah Shammari (Application No. CEACAA002TFJXF) to Appear as Witnesses in *Al Shimari v. CACI Int'l, Inc.*, Civil Action No. 08-cv-0827

Dear Assistant Secretary Posner:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to applicant Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari) in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture and abuse against a private military contractor, CACI International, Inc. **I write to respectfully – and urgently – request the expedited processing of the visa application of Mr. Arrak (Application No. CEACAA002TFPTZ), Mr. Alnamri (Application No. CEACAA002TFNAZ), and Mr. Shammari (Application No. CEACAA002TFJXF) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee.¹ The Court issued an order yesterday, February 14, 2013, compelling the appearance of the plaintiffs at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia within the next 30 days.** (A copy of the court order is attached as Exhibit A, and Plaintiffs' Second Amended Complaint is attached as Exhibit B.).

Mr. Arrak, Mr. Alnamri, and Mr. Shammari filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, and were interviewed on or about January 23, 2013. (Copies of each plaintiff's visa applications, confirmations of receipt of their applications, CCR's letters of support, and notices of their interview appointments are attached as Exhibits C, D, and E, respectively.) All three plaintiffs have family and employment in Iraq and have every intention of returning to their home country following the conclusion of legal proceedings in this case. CCR and its

¹ The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), residing in Doha, Qatar, recently had his visa application approved by the United States Embassy in Doha, Qatar.

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on the front lines for social justice

co-counsel will provide all necessary financial support while they are in the U.S. and for their return to Iraq.

We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI Int'l, Inc.*, No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures

From: (212) 614-6427
Baher Azmy
Center for Constitutional Rights
666 Broadway
7th Floor
New York, NY 10012

Origin ID: JWSA



Ship Date: 15FEB13
ActWgt: 0.5 LB
CAD: 5029179/INET3370

Delivery Address Bar Code

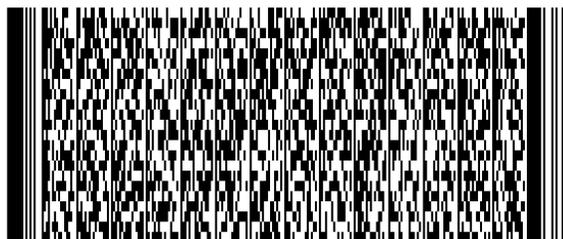


SHIP TO: (202) 647-1337 **BILL SENDER**
Michael Posner, Asst Sec of State
Department of State
Bureau of DRL
2201 C Street NW
WASHINGTON, DC 20520

Ref # 554
Invoice #
PO #
Dept #

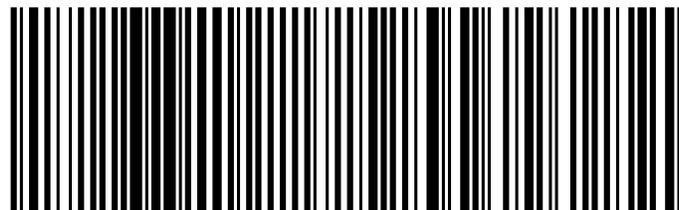
MON - 18 FEB A2
PRIORITY OVERNIGHT

TRK# 7947 6416 6400
0201



SA AUKA

20520
DC-US
DCA



518G1/DF24/93AB

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

EXHIBIT 9

← → ↻ <https://ceac.state.gov/CEACStatTracker/Status.aspx?eQs=WwjqOibeRYzCYubaSQI+RA==>



BACK

VISA STATUS CHECK

Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type

NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location

IRAQ, BAGHDAD

Application ID or Case Number

AA002TFJXF

(e.g., AA0020AKAX or 2012118 345 0001)

Submit



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFJXF**

Case Creation Date: 23-Jan-2013

Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

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U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

BACK

VISA STATUS CHECK

Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type

NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location

IRAQ, BAGHDAD

Application ID or Case Number

AA002TFPTZ

(e.g., AA0020AKAX or 2012118 345 0001)

Submit



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFPTZ**

Case Creation Date: 23-Jan-2013

Status Updated Date: 25-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

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Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type
NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location
IRAQ, BAGHDAD

Application ID or Case Number
AA002TFNAZ
(e.g., AA002QAKAX or 2012118 345 0001)

Submit



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFNAZ**
Case Creation Date: 23-Jan-2013
Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

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EXHIBIT 10



٠١٢/٢/١٥ موعّد الحجز

سند قبض
المبلغ الكلي
7901\$

No 02834

التاريخ ٢٠٢٢ / ٢٨٣

A-WIRS CO.
TRAVEL & TOURISM LTD.

بغداد - مجمع الصالحية السكني (سنتر A)
E-mail: a_wirs@yahoo.com Mobile : 07901593899 - 07705845966

Recived From استلمت من السيد هادي عثمان

Tel. هاتف Sum \$ 7901 مبلغا وقدره

For وذلك عن قطع ٣ تذكرة بغداد شيكاغو بغداد سعر التذكرة (\$219)

وتذكرة بغداد اسطنبول بغداد سعر التذكرة (1328) الختم والتوقيع

الختم والتوقيع

EXHIBIT 11

Shereef Akeel

From: Jarvie, Keith <Keith.Jarvie@tsa.dhs.gov>
Sent: Thursday, March 14, 2013 1:16 PM
To: Shereef Akeel
Subject: RE: Letters Each Iraqi Client will have on their person for the Abu Gharib Case at O'hare Airport this Friday (March 15, 2013)

Shereef,

I am happy to assist and will follow up with Chicago.

Keith

Keith E. Jarvie
Stakeholder Manager
U.S. Department of Homeland Security-DHS
Transportation Security Administration-TSA
Detroit Field Office-DTW
Phone: 734-942-2971
Fax: 734-955-8603
E-Mail: keith.jarvie@dhs.gov

From: Shereef Akeel [<mailto:shereef@akeelvalentine.com>]
Sent: Thursday, March 14, 2013 11:31 AM
To: Jarvie, Keith; Ball, Robert (DTW)
Subject: Letters Each Iraqi Client will have on their person for the Abu Gharib Case at O'hare Airport this Friday (March 15, 2013)
Importance: High

Keith – please see the attached letters. Each client will have a letter on their person to be able to show to the border control folks. I will be there outside waiting for them in Chicago. As you know, they don't speak English but will be advised to show the attached.

As we discussed, If can you please just provide a heads up to the folks in Chicago. We just want to make this border encounter is as least traumatic as possible. This is their first time to the United States and as you know they suffered a lot, and now they are embarking on a historic case that hopefully will reflect the essence of democracy to the Iraqi people on being able to seek accountability.

Thank you for your assistance. We really appreciate it.

Ps. See Bob there is some use for our Bridges meetings, which I will make it a point to bring up in our next meeting.

Shereef Akeel
Akeel & Valentine, PLC
Ste 910
888 West Big Beaver
Troy, MI 48084
(248) 269 9595 - Phone
(248) 269-9119 – Fax
Shereef@akeelvalentine.com

www.akeelvalentine.com

EXHIBIT 12

AKEEL & VALENTINE, PLC
ATTORNEYS AND COUNSELORS
888 W. BIG BEAVER ROAD
SUITE 910
TROY, MICHIGAN 48064-4736
TEL: (248) 269-9595
FAX: (248) 269-9119
www.akeelvalentine.com

March 13, 2013

SHEREEF H. AKEEL, P.C.
GLENN L. VALENTINE, P.C.
S. HUSSAIN AKBAR
MUNEEB M. AHMAD

DEARBORN OFFICE
13530 MICHIGAN AVE.
SUITE 322A
DEARBORN, MI 48126-3574

Transportation Security Administration
O'Hare International Airport
10000 West O'Hare Avenue
Chicago, IL 60666

Re: Explanation of Travel of Mr. Suhail Najm Abdullah Shammari

Dear Sir/Madam:

Please be advised that we are attorneys for **Suhail Najm Abdullah Shammari** who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Shammari and airport staff as Mr. Shammari is not fluent in English.

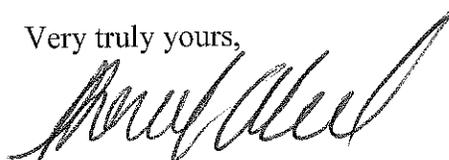
Mr. Shammari is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Shammari is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. Shammari has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Shammari's flight where we plan to meet him at the Chicago O'Hare International Airport. Mr. Shammari's plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Shammari.

Very truly yours,



Shereef H. Akeel

SHA/cap

Z:\A_B\Abu Ghraib Detainees\Al-Shimiri Virginia Case\Correspondence\O'Hare TSA Letter - Shammari.doc

AKEEL & VALENTINE, PLC
ATTORNEYS AND COUNSELORS
888 W. BIG BEAVER ROAD
SUITE 910
TROY, MICHIGAN 48084-4736
TEL: (248) 269-9595
FAX: (248) 269-9119
www.akeelvalentine.com

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10000 West O'Hare Avenue
Chicago, IL 60666

Re: Explanation of Travel of Mr. Asaad Hamzah Hanfoosh Alnamri

Dear Sir/Madam:

Please be advised that we are attorneys for **Asaad Hamzah Hanfoosh Alnamri** who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Alnamri and airport staff as Mr. Alnamri is not fluent in English.

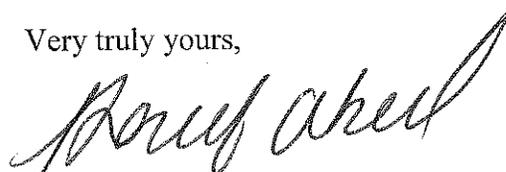
Mr. Alnamri is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Alnamri is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Alnamri's flight where we plan to meet him at the Chicago O'Hare International Airport. Mr. Alnamri's plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Alnamri.

Very truly yours,



Shereef H. Akeel

SHA/cap

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March 13, 2013

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13530 MICHIGAN AVE.
SUITE 322A
DEARBORN, MI 48126-3574

Transportation Security Administration
O'Hare International Airport
10000 West O'Hare Avenue
Chicago, IL 60666

Re: Explanation of Travel of Mr. Taha Yaseen Arrak

Dear Sir/Madam:

Please be advised that we are attorneys for **Taha Yaseen Arrak** who is in possession of this letter. The purpose of this letter is to serve as communication between Mr. Arrak and airport staff as Mr. Arrak is not fluent in English.

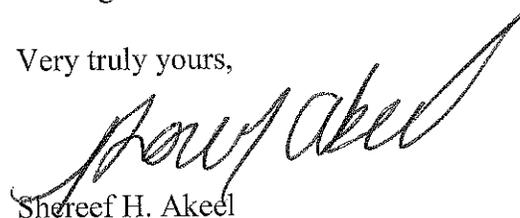
Mr. Arrak is from Iraq, and has a legal case currently pending in Alexandria, Virginia at the United States District Court, Eastern District of Virginia. Mr. Arrak is one of four Plaintiffs in this case (Case No. 08-cv-0827 GBL-JFA).

Mr. Arrak has been granted a Visa by the United States and is scheduled to testify next week in Washington, D.C., pursuant to an Order issued by the Honorable Judge Gerald Lee of the United States District Court, Eastern District of Virginia.

We have made arrangements for Mr. Arrak's flight where we plan to meet him at the Chicago O'Hare International Airport. Mr. Arrak's plane is set to arrive on March 15, 2013, at approximately 6:50 p.m. by Turkish Airlines (FL# TK5). I will be providing accommodations for him during his stay in the U.S. He will be returning to Iraq on Sunday, March 24, 2013, at approximately 11 p.m.

If you have any further questions, please feel free to contact me on my cell number at 248-408-3660, as I will be at the airport waiting to meet Mr. Arrak.

Very truly yours,



Shereef H. Akeel

SHA/cap

EXHIBIT 13

TURKISH AIRLINES



BOARDING PASS / BIRIS YARTI

NAME / İSİM
ALNAMRI ASAAD

ORIGIN / KAYNAK
BAGHDAD

DESTINATION / Hedef
ISTANBUL

FLIGHT / Uçuş
TK 0803 Y 15MAR09:40

GROUP A

23C

Q/O 088 AD/
ET 2352105710436/1

A STAR ALLIANCE MEMBER 

TURKISH AIRLINES 

BOARDING PASS | BİNİŞ KARTI

NAME / İSİM

ARRAK TAHA

FROM / NEREDEN

BAGHDAD

TO / NEREYE

ISTANBUL

FLIGHT
UÇUŞ

CLASS
SINIF

DATE
TARİH

TIME
SAAT

TK 0803 Y 15MAR09:40

GROUP **A**

SEAT / KOLTUK
24C

0/0

089

AD/

ET 2352105710435/1

A STAR ALLIANCE MEMBER



TURKISH
AIRLINES



Document 410-2 Filed 05/06/

3 CARD NO. PAS | BİNEŞ KARTI

NAME / İSİM

SHAMMARI SUHAIL

FROM / NEREDEN

BAGHDAD

TO / NEREYE

ISTANBUL

FLIGHT
UÇUŞ

CLASS
SINIF

DATE
TARİH

TIME
SAAT

TK 0803 Y 15MAR09:40

GROUP **A**

SEAT / KOLTUK
27B

0/0

087

AD/

ET 2352105710437/1

A STAR ALLIANCE MEMBER



** THIS IS A THIRD PARTY BOOKING SEE CIC*29 ***

F 1.1ARRAK/TAHAMR 2.1ALNAMRI/ASAADMR 3.1SHAMMARI/SUHAILMR

SWI1GMDT3PW/65ML/34111243/BGW/1G/T/IQ 12MAR S4LDE8

1 TK 803 M FR 15MAR BGWIST HK3 0940 1150 Y M01.1E

2 TK 5 M FR 15MAR ISTORD HK3 1340 1850 Y M01.2E

3 TK 6 K SU 24MAR ORDIST HK3 2300 1645*Y M02.1E

4 TK 802 K TU 26MAR ISTBGW HK3 0350 0725 Y M02.2E

TKT-Y12MARBGWHS 2352105710435/36/37

AP FAX-1 SSRDOCSTKHK1 /P/IRQ/2258006/IRQ/10DEC81/M/23FEB14/ARRAK/TAHA
/YASEEN

2.2 SSRDOCSTKHK1 /P/IRQ/2339256/IRQ/01JUL73/M/14FEB14/ALNAMRI/ASSAD/H
AMZAH

3.3 SSRDOCSTKHK1 /P/IRQ/2080226/IRQ/11OCT59/M/14FEB14/SHAMMARI/SUHAIL
/NAJM

4.1 S1 SSRTKNETKHK1 2352105710435C1

5.1 S2 SSRTKNETKHK1 2352105710435C2

6.1 S3 SSRTKNETKHK1 2352105710435C3

7.1 S4 SSRTKNETKHK1 2352105710435C4

8.2 S1 SSRTKNETKHK1 2352105710436C1

9.2 S2 SSRTKNETKHK1 2352105710436C2

10.2 S3 SSRTKNETKHK1 2352105710436C3

11.2 S4 SSRTKNETKHK1 2352105710436C4

12.3 S1 SSRTKNETKHK1 2352105710437C1

13.3 S2 SSRTKNETKHK1 2352105710437C2

14.3 S3 SSRTKNETKHK1 2352105710437C3

15.3 S4 SSRTKNETKHK1 2352105710437C4

GEN FAX-OSITK CTCT BGW 9647705845966-AWIRS TRAVELTOURISM LTD-BAGHDAD-
RANA

2.SSRADPI1GHK3 ADV SECURE FLT PSGR DATA FOR ALL PSGRS

3.SSROTHS1G PNR TRANSFERED TO TK PLS FOLOW UP BY TK

4.1 OSITK TKNO SSSROTHS 1G 2352105710435

5.2 SSROTHS1G TKNO2352105710436

6.3 SSROTHS1G TKNO2352105710437

** THIS IS A THIRD PARTY BOOKING SEE CIC*29 ***

F 1.1ARRAK/TAHAMR 2.1ALNAMRI/ASAADMR 3.1SHAMMARI/SUHAILMR

SWI1GMDT3PW/65ML/34111243/BGW/1G/T/IQ 12MAR S4LDE8

1 TK 803 M FR 15MAR BGWIST HK3 0940 1150 Y M01.1E

2 TK 5 M FR 15MAR ISTDOR HK3 1340 1850 Y M01.2E

3 TK 6 K SU 24MAR ORDIST HK3 2300 1645*Y M02.1E

4 TK 802 K TU 26MAR ISTBGW HK3 0350 0725 Y M02.2E

TKT-Y12MARBGWHS 2352105710435/36/37

AP FAX-1 SSRDOCSTKHK1 /P/IRQ/2258006/IRQ/10DEC81/M/23FEB14/ARRAK/TAHA
/YASEEN

2.2 SSRDOCSTKHK1 /P/IRQ/2339256/IRQ/01JUL73/M/14FEB14/ALNAMRI/ASSAD/H
AMZAH

3.3 SSRDOCSTKHK1 /P/IRQ/2080226/IRQ/11OCT59/M/14FEB14/SHAMMARI/SUHAIL
/NAJM

4.1 S1 SSRTKNETKHK1 2352105710435C1

5.1 S2 SSRTKNETKHK1 2352105710435C2

6.1 S3 SSRTKNETKHK1 2352105710435C3

7.1 S4 SSRTKNETKHK1 2352105710435C4

8.2 S1 SSRTKNETKHK1 2352105710436C1

9.2 S2 SSRTKNETKHK1 2352105710436C2

10.2 S3 SSRTKNETKHK1 2352105710436C3

11.2 S4 SSRTKNETKHK1 2352105710436C4

12.3 S1 SSRTKNETKHK1 2352105710437C1

13.3 S2 SSRTKNETKHK1 2352105710437C2

14.3 S3 SSRTKNETKHK1 2352105710437C3

15.3 S4 SSRTKNETKHK1 2352105710437C4

GEN FAX-OSITK CTCT BGW 9647705845966-AWIRS TRAVELTOURISM LTD-BAGHDAD-
RANA

2.SSRADPI1GHK3 ADV SECURE FLT PSGR DATA FOR ALL PSGRS

3.SSROTHS1G PNR TRANSFERED TO TK PLS FOLOW UP BY TK

4.1 OSITK TKNO SSSROTHS 1G 2352105710435

5.2 SSROTHS1G TKNO2352105710436

6.3 SSROTHS1G TKNO2352105710437

EXHIBIT 14



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002Z39T5

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

Photo Not Provided

الاسم المعطى: SHAMMARI, SUHAIL NAJM
ABDULLAH

1959

محل الميلاد: BAGHDAD, IRAQ

الجنس: Male

الجنسية: IRAQ

رقم جواز السفر: [REDACTED]

الغرض من السفر: BUSINESS/PERSONAL
(B1/B2)

تاريخ إستكمال الطلب: 16 MAR 2013

رقم التأكيد: AA002Z39T5

الموقع الذي تم اختياره:

BGH
U.S. Embassy Baghdad
Al Kindi Street
International Zone
Baghdad, Iraq

Version 01.02.00

هذه ليست تأشيرة

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة



AA002Z39T5

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة طلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالمثل لأي رسوم يمكن مطالبتك بتسديدها

أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى

<http://travel.state.gov> .

ملحوظة: ما لم تكن معفى من المقابلة، سيتحتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت معفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. توقيعك AM EST. لقد وقعت إستمارتك إلكترونياً في 2013/16/3 1:13:32 الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك للمسئولية تحت طائلة (U.S.C. 1746 القانون). (28

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002Z3E41

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

	الاسم المعطى:	ARRAK, TAHA YASEEN	الموقع الذي تم اختياره:
	محل الميلاد:	1981	BGH
	الجنس:	Male	U.S. Embassy Baghdad
	الجنسية:	IRAQ	Al Kindi Street
	رقم جواز السفر:		International Zone
	الغرض من السفر:	BUSINESS/PERSONAL (B1/B2)	Baghdad, Iraq
	تاريخ إستكمال الطلب:	16 MAR 2013	
	رقم التأكيد:	AA002Z3E41	

Version 01.02.00

هذه ليست تأشيرة

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة



AA002Z3E41

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة طلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالمثل لأي رسوم يمكن مطالبتك بتسديدها

أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى

<http://travel.state.gov> .

ملحوظة: ما لم تكن معفى من المقابلة، سيتحتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت معفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. توقيعك AM EST. لقد وقعت إستمارتك إلكترونياً في 2013/16/3 3:49:53 الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك للمسئولية تحت طائلة (U.S.C. 1746) القانون. (28)

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U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

Online Nonimmigrant Visa Application (DS-160)

Confirmation



AA002Z37HH

هذا تأكيد على تقديم إستمارة التأشيرة لغير الهجرة لـ

	الاسم المعطى:	ALNAMRI, ASAAD HAMZAH HANFOOSH	الموقع الذي تم اختياره:	BGH U.S. Embassy Baghdad Al Kindi Street International Zone Baghdad, Iraq
	محل الميلاد:	1973		
	الجنس:	Male		
	الجنسية:	IRAQ		
	رقم جواز السفر:			
	الغرض من السفر:	BUSINESS/PERSONAL (B1/B2)		
	تاريخ إستكمال الطلب:	16 MAR 2013		
	رقم التأكيد:	AA002Z37HH		Version 01.02.00

هذه ليست تأشيرة

يجب عليك إحضار

جواز السفر

يمكنك أيضاً الإدلاء بمستندات إضافية والتي يمكن أن تدعم طلبك للتأشيرة



AA002Z37HH

يرجى ملاحظة أن سوف تكون هناك حاجة لتقديم دليل على أن لديك دفع رسوم طلب التأشيرة وأية رسوم أخرى مرتبطة مع التطبيق الخاص بك. قد يكون هناك غيرها من الرسوم المرتبطة طلب التأشيرة. يرجى مراجعة الخاص البلاد جدول المعاملة بالمثل لأي رسوم يمكن مطالبتك بتسديدها

أو http://arabic.iraq.usembassy.gov/non_immigrant_visas.html إذا كان لديك أسئلة إضافية، أو للإستعلام حول كيفية الإتصال بالفتصلية، برجاء الذهاب إلى

<http://travel.state.gov> .

ملحوظة: ما لم تكن معفى من المقابلة، سيتحتم عليك توقيع التطبيق الخاص بك عن طريق توفير التوقيع البيولوجي، أي البصمات الخاصة بك أمام مسؤول قنصلي. من خلال تقديم هذا التوقيع البيولوجي، أنت تقر تحت طائلة المسؤولية أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. وعلاوة على ذلك، ستطالب في وقت المقابلة الخاصة بالإقرار تحت عقوبة شهادة الزور أن جميع البيانات في الإستمارة الخاصة بك والتي قدمت خلال مقابلة صحيحة وكاملة على أفضل ما في علمك ومعتقداتك

لقد كنت مطالباً بتوقيع طلبك إلكترونياً، إلا إذا كنت معفى طبقاً للقوانين، حتى وإن كان شخص آخر قد قام بإستكمال إستمارتك. توقيعك AM EST. لقد وقعت إستمارتك إلكترونياً في 2013/16/3 1:13:32 الإلكتروني للإستمارة يؤكد أنك قد قرأت وفهمت الأسئلة المطروحة في طلب التأشيرة لغير الهجرة الخاصة بك وأن كافة البيانات الواردة في طلبك لتأشيرة لغير الهجرة صحيحة وكاملة على حد معرفتك ومعتقداتك. تقديم إستمارة تتضمن معلومات خاطئة أو مضللة قد تؤدي إلى الرفض الدائم لطلبات التأشيرات الخاصة بك أو رفض طلبك لدخول الولايات المتحدة. جميع التصريحات المذكورة في هذا الطلب قد تعرضك للمسئولية تحت طائلة (U.S.C. 1746). القانون. (28)

المعلومات التي قدمت في الإستمارة الخاصة بك وغيرها من المعلومات المقدمة مع الإستمارة الخاصة بك قد تكون متاحة إلى الوكالات الحكومية الأخرى التي لديها سلطة قانونية أو غير قانونية لاستخدام هذه المعلومات، بما في ذلك لأغراض تنفيذ القانون و تنفيذ قانون الهجرة. ويمكن استخدام الصورة التي تقدمها مع التطبيق الخاص بك للتحقق من العمل أو غيرها من أغراض القانون في الولايات المتحدة

EXHIBIT 15

Dated: Bethesda, Maryland
April 5, 2013

/s/ George Brent Mickum
George Brent Mickum IV (VA Bar # 24385)
Law Firm of George Brent Mickum IV
5800 Wiltshire Drive
Bethesda, MD 20816
Telephone: (202) 281-8662
gbmickum@gmail.com

Baher Azmy
Katherine Gallagher
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012

Robert P. LoBue
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036

Shereef Hadi Akeel
AKEEL & VALENTINE, P.C.
888 West Big Beaver Road
Troy, Michigan 48084-4736

Attorneys for Plaintiffs

SCHEDULE A

DEFINITIONS

1. “Abu Ghraib” means the Abu Ghraib prison complex in or near Baghdad, Iraq.
2. “Army Field Manual” means the United States Army Field Manual on Interrogation, also known as FM 34-52, including any amendments or editions thereof, and/or Army Field Manual 2 22.3, or FM 2-22.3, Human Intelligence Collector Operations, including any amendments or editions thereof.
3. “CACI International” means CACI International, Inc. and any of its predecessors, affiliates, subsidiaries (including but not limited to CACI Premier Technology, Inc.), divisions, business units, partners, principals, directors, officers, employees, attorneys, accountants, agents, consultants, independent contractors, assigns, and any person or entity purporting to act on its behalf.
4. “CACI PT” means CACI Premier Technology, Inc.
5. “Department of Defense Directive” means Department of Defense Directive 5100.77, dated December 9, 1998.
6. “Geneva Conventions” means the Geneva Convention relative to the Treatment of Prisoners of War (12 August 1949), also known as the Third Geneva Convention, and the Geneva Convention relative to the Protection of Civilian Persons in Time of War (12 August 1949), also known as the Fourth Geneva Convention, including any and all protocols and/or amendments thereto.

7. “Plaintiff” means any or all of the plaintiffs in this action: Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, Asa’ad Hamza Hanfoosh Al-Zuba’e, and Salah Hasan Nsaif Jasim Al-Ejaili.

8. “Services” means any conduct engaged in by any and all CACI International or CACI PT employees or agents of any sort whatsoever for which CACI International or CACI PT was paid, sought to be paid, or had a reasonable expectation that CACI International or CACI PT would be paid or would seek to be paid, by the United States. Conduct is not outside the scope of the definition of Services merely because CACI International or CACI PT ultimately decided not to bill the United States for the conduct and/or the United States ultimately decided not to pay CACI International or CACI PT for the conduct.

9. “United States” means any and all Executive Branch and Congressional Branch governmental entities of any sort, including but not limited to, the House of Representatives, the Senate, any committee or subcommittee of the House or the Senate, individual members of the House or Senate, the United States Army, Navy, Air Force, Marines, the Department of Defense, the Department of the Interior, the Department of Justice, and any and all other governmental agencies; and any and all persons employed by any such Executive or Congressional Branch entities. The term “United States” *excludes* the Judicial Branch and private contractors such as CACI International or CACI PT retained by the United States government to provide Services.

TOPICS FOR EXAMINATION

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, CACI PT is directed to produce a representative or representatives to testify regarding the following matters:

Rule 30(b)(6) Categories

1. All steps taken to preserve records relating to CACI PT's provision of services to the United States in Iraq.
2. All steps taken to respond to the United States' investigations or inquiries (whether formal or informal) relating to CACI PT's provision of services to the United States in Iraq.
3. All steps taken to inform the Board of Directors of CACI International or CACI PT about the United States' investigations or inquiries (whether formal or informal) relating to CACI PT's provision of services in Iraq.
4. Internal investigations by CACI International or CACI PT relating to CACI PT's provision of services in Iraq.
5. CACI International's or CACI PT's public relations strategy to address the allegations of detainee abuse in connection with CACI PT's provision of services to the United States in Iraq.
6. CACI PT's policies and practices for recruiting, hiring, training, and supervising employees in connection with CACI PT's provision of services to the United States in Iraq.
7. All instruction and training provided to CACI PT employees providing services at Abu Ghraib regarding the requirements of the Geneva Conventions, Department of Defense Directive, the Army Field Manual, or U.S. Army Regulation 190-8, relating to the treatment of prisoners.
8. All compensation received by CACI PT in connection with CACI's provision of services to the United States in Iraq.

9. CACI PT's management and organizational structure.

10. The involvement of employees, officers or directors of CACI International in any aspect of CACI PT's provision of services to the United States in Iraq.

11. All information known to CACI PT about the four named plaintiffs.

12. All information known to CACI PT about torture or other abuse of detainees at Abu Ghraib.

13. The recruitment and employment by CACI International or CACI PT of: Claudius Albury, Adrian Allen, Jose Almanzar, Richard Arant, John Arellano, William Armstrong, Mikhail Bagdassarov, Jose Bartolomei, Mark Billings, Peter Bilon, Henry Black, John Blee, Kevin Lee Bloodworth, Michael Cahoon, Christine Chaney, Armando Chapa, Dion Cox, Jose Cruz, Stephen Dedeaux, Timothy Dugan, Sean Duysen, Michele Engstrom, Eric Fair, Michael Farrell, Stephen Furbush, Tyrone Gardner, Meyer Gilbert, Skyler Greco, Brian Greene, Charles Hattabaugh, John Hedrick, Michael Henson, Dennis Hirth, Brett Holder, Tom Howard, Donald Hyde, Ferdinand Ibabao, Lisa Isaacs, Berryl Jackson, Daniel Johnson, John Thomas Johnson, James Matheson, James Mayo, Jeff McCall, William McNulty, Martin Meadows, Elliot Miller, Amy Monahan, Harold Mong, Jeffery Mouton, Chuck Mudd, Guil Mullen, Sean Nelson, Torin Nelson, Scott Norman, Scott Northrop, Steven Pescatore, Daniel Porvaznik, Kenneth Powell, Hugh Brent Prestley, Todd Preston, Miguel Rivera, Joseph Ryan, James Schaffer, Donald Simpson, Robert Smith Jr., Wayne Smith, Steven Stefanowicz, Eddie Thomas, Harry Thornsvard, Michael Tutor, Alexander Valle, Ervisto Villela Sr., Ronald Warner, Marcus Warren, Allen West, Antoine Williams, and Dani Zeinoun (the "Employees"), including without limitation the identity and employer of the persons who recruited, trained and supervised the Employees, and the specific corporate entity that paid the costs of recruitment and salary or other compensation of each Employee.

14. The reporting structure(s) within CACI PT related to any aspect of CACI PT's provision of services to the United States in Iraq.

15. Any insurance policies covering CACI PT that may be applicable to the claims in this action.

16. Solicitation and negotiation by or on behalf of CACI PT of service contracts with the United States for any Services to be performed in Iraq.

17. Any information relating to the denial of permission for plaintiffs Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, and Asa'ad Hamza Hanfoosh Al-Zuba'e to board a flight to the United States or otherwise enter the United States, including CACI PT's knowledge of the involvement of the Department of Homeland Security or any other U.S. Government agency in such action or regarding any of these plaintiffs' names being on any list or in any database maintained by the U.S. Government.

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

_____)	
SUHAIL NAJIM)	
ABDULLAH AL SHIMARI <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	C.A. No. 08-cv-0827 GBL-JFA
v.)	
)	
CACI INTERNATIONAL, INC., <i>et al.</i>)	
)	
Defendants.)	
_____)	

**SECOND AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF
CACI INTERNATIONAL, INC.**

TAKE NOTICE that Plaintiffs will take the deposition of CACI International, Inc. (“CACI International”) beginning on April 15, 2013 at 9:30 a.m. and continuing thereafter until complete, at the offices of Zwerling, Moseley & Spears, P.C., 114 North Alfred Street, Alexandria, VA 22314, before a Notary Public or other officer duly authorized to administer oaths, to be recorded by stenographic means and by videotape.

NOTICE IS HEREBY GIVEN that pursuant to Fed. R. Civ. P. 30(b)(6), CACI International is required to designate one or more appropriate persons to testify on its behalf with respect to each of the matters set forth in Schedule A attached hereto, and the person(s) so designated shall be required to testify as to each of those matters known or reasonably available to the corporation.

Dated: Bethesda, Maryland
April 5, 2013

/s/ George Brent Mickum
George Brent Mickum IV (VA Bar # 24385)
Law Firm of George Brent Mickum IV
5800 Wiltshire Drive
Bethesda, MD 20816
Telephone: (202) 281-8662
gbmickum@gmail.com

Baher Azmy
Katherine Gallagher
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012

Robert P. LoBue
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036

Shereef Hadi Akeel
AKEEL & VALENTINE, P.C.
888 West Big Beaver Road
Troy, Michigan 48084-4736

Attorneys for Plaintiffs

SCHEDULE A

DEFINITIONS

1. “Abu Ghraib” means the Abu Ghraib prison complex in or near Baghdad, Iraq.
2. “Army Field Manual” means the United States Army Field Manual on Interrogation, also known as FM 34-52, including any amendments or editions thereof, and/or Army Field Manual 2 22.3, or FM 2-22.3, Human Intelligence Collector Operations, including any amendments or editions thereof.
3. “CACI International” means CACI International, Inc. and any of its predecessors, affiliates, subsidiaries (including but not limited to CACI Premier Technology, Inc.), divisions, business units, partners, principals, directors, officers, employees, attorneys, accountants, agents, consultants, independent contractors, assigns, and any person or entity purporting to act on its behalf.
4. “CACI PT” means CACI Premier Technology, Inc.
5. “Department of Defense Directive” means Department of Defense Directive 5100.77, dated December 9, 1998.
6. “Geneva Conventions” means the Geneva Convention relative to the Treatment of Prisoners of War (12 August 1949), also known as the Third Geneva Convention, and the Geneva Convention relative to the Protection of Civilian Persons in Time of War (12 August 1949), also known as the Fourth Geneva Convention, including any and all protocols and/or amendments thereto.
7. “Plaintiff” means any or all of the plaintiffs in this action: Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, Asa’ad Hamza Hanfoosh Al-Zuba’e, and Salah Hasan Nsaif Jasim Al-Ejaili.

8. “Services” means any conduct engaged in by any and all CACI International or CACI PT employees or agents of any sort whatsoever for which CACI International or CACI PT was paid, sought to be paid, or had a reasonable expectation that CACI International or CACI PT would be paid or would seek to be paid, by the United States. Conduct is not outside the scope of the definition of Services merely because CACI International or CACI PT ultimately decided not to bill the United States for the conduct and/or the United States ultimately decided not to pay CACI International or CACI PT for the conduct.

9. “United States” means any and all Executive Branch and Congressional Branch governmental entities of any sort, including but not limited to, the House of Representatives, the Senate, any committee or subcommittee of the House or the Senate, individual members of the House or Senate, the United States Army, Navy, Air Force, Marines, the Department of Defense, the Department of the Interior, the Department of Justice, and any and all other governmental agencies; and any and all persons employed by any such Executive or Congressional Branch entities. The term “United States” *excludes* the Judicial Branch and private contractors such as CACI International or CACI PT retained by the United States government to provide Services.

TOPICS FOR EXAMINATION

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, CACI International is directed to produce a representative or representatives to testify regarding the following matters:

Rule 30(b)(6) Categories

1. All steps taken to preserve records relating to CACI PT's provision of services to the United States in Iraq.

2. All steps taken to respond to the United States' investigations or inquiries (whether formal or informal) relating to CACI PT's provision of services to the United States in Iraq.

3. All steps taken to inform the Board of Directors of CACI International about the United States' investigations or inquiries (whether formal or informal) relating to CACI PT's provision of services in Iraq.

4. Internal investigations by CACI International relating to CACI PT's provision of services in Iraq.

5. CACI International's public relations strategy to address the allegations of detainee abuse in connection with CACI PT's provision of services to the United States in Iraq.

6. CACI International's policies and practices for recruiting, hiring, training, and supervising employees in connection with CACI PT's provision of services to the United States in Iraq.

7. All instruction and training provided to CACI International or CACI PT employees providing services at Abu Ghraib regarding the requirements of the Geneva Conventions, Department of Defense Directive, the Army Field Manual, or U.S. Army Regulation 190-8, relating to the treatment of prisoners.

8. All compensation received by CACI International or CACI PT in connection with CACI PT's provision of services to the United States in Iraq.

9. CACI International's and CACI PT's management and organizational structures.

10. The involvement of employees, officers or directors of CACI International in any aspect of CACI PT's provision of services to the United States in Iraq.

11. All information known to CACI International about the four named plaintiffs.

12. All information known to CACI International about torture or other abuse of detainees at Abu Ghraib.

13. The recruitment and employment by CACI International or CACI PT of: Claudius Albury, Adrian Allen, Jose Almanzar, Richard Arant, John Arellano, William Armstrong, Mikhail Bagdassarov, Jose Bartolomei, Mark Billings, Peter Bilon, Henry Black, John Blee, Kevin Lee Bloodworth, Michael Cahoon, Christine Chaney, Armando Chapa, Dion Cox, Jose Cruz, Stephen Dedeaux, Timothy Dugan, Sean Duysen, Michele Engstrom, Eric Fair, Michael Farrell, Stephen Furbush, Tyrone Gardner, Meyer Gilbert, Skyler Greco, Brian Greene, Charles Hattabaugh, John Hedrick, Michael Henson, Dennis Hirth, Brett Holder, Tom Howard, Donald Hyde, Ferdinand Ibabao, Lisa Isaacs, Berryl Jackson, Daniel Johnson, John Thomas Johnson, James Matheson, James Mayo, Jeff McCall, William McNulty, Martin Meadows, Elliot Miller, Amy Monahan, Harold Mong, Jeffery Mouton, Chuck Mudd, Guil Mullen, Sean Nelson, Torin Nelson, Scott Norman, Scott Northrop, Steven Pescatore, Daniel Porvaznik, Kenneth Powell, Hugh Brent Prestley, Todd Preston, Miguel Rivera, Joseph Ryan, James Schaffer, Donald Simpson, Robert Smith Jr., Wayne Smith, Steven Stefanowicz, Eddie Thomas, Harry Thornsvar, Michael Tutor, Alexander Valle, Ervisto Villela Sr., Ronald Warner, Marcus Warren, Allen West, Antoine Williams, and Dani Zeinoun (the "Employees"), including without limitation the identity and

employer of the persons who recruited, trained and supervised the Employees, and the specific corporate entity that paid the costs of recruitment and salary or other compensation of each Employee.

14. Any insurance policies covering CACI PT that may be applicable to the claims in this action.

15. Solicitation and negotiation by or on behalf of CACI PT of service contracts with the United States for any Services to be performed in Iraq.

16. Any information relating to the denial of permission for plaintiffs Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, and Asa'ad Hamza Hanfoosh Al-Zuba'e to board a flight to the United States or otherwise enter the United States, including CACI International's knowledge of the involvement of the Department of Homeland Security or any other U.S. Government agency in such action or regarding any of these plaintiffs' names being on any list or in any database maintained by the U.S. Government.

EXHIBIT 16

Patterson Belknap Webb & Tyler LLP

1133 Avenue of the Americas New York, NY 10036-6710 212.336.2000 fax 212.336.2222 www.pbwt.com

April 15, 2013

Sarah H. Lorr
Associate
(212) 336-2474
slorr@pbwt.com

By Hand

Office of the General Counsel
United States Department of Homeland Security
Washington, DC 20258

**Re: Al Shimari et al. v. CACI Int'l, No. 08-0827 (E.D. Va.)—Subpoena
Duces Tecum**

Dear Sir or Madam:

Please find enclosed a subpoena in connection with the above-referenced action, in which we represent the plaintiffs. Please accept the subpoena, in conjunction with this letter, as our request pursuant to *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951), and the relevant regulations.

On March 15, 2013, three plaintiffs we represent in the above-referenced action—Suhail Najim Abdullah Al Shimari, Taha Yaseen Arraq Rashid, Asa'ad Hamza Hanfoosh Al-Zuba'e—were prevented from boarding an airplane in Baghdad, Iraq to travel to the United States for depositions, despite having received visas to enter the United States in February 2013. The plaintiffs had purchased tickets and received boarding passes to travel from Baghdad to Chicago O'Hare International Airport, via Istanbul, Turkey. However, after arriving at the airport in Baghdad and proceeding to their departure gate, the plaintiffs were prevented from boarding their flight to Istanbul for unknown reasons.

At a hearing held on Friday, April 12, 2013, the Court in the above-referenced action directed plaintiffs' counsel to determine why the plaintiffs were prevented from boarding their flight on March 15 and what steps must be taken to facilitate the plaintiffs' future travel to the United States. The information requested in the attached subpoena is directly relevant to the Court's request and to the plaintiffs' ability to pursue their litigation.

You must respond to this subpoena by producing responsive documents on or before **April 22, 2013** at the Law Firm of George Brent Mickum IV, 5800 Wiltshire Drive, Bethesda, MD 20816. Alternatively, you may mail the documents to the attention of Sarah Lorr at Patterson Belknap Webb & Tyler LLP, 1133 Avenue of the Americas, New York, NY 10036.

April 15, 2013
Page 2

If you have any questions, please contact me by phone at (212) 336-2474 or by email at slorr@pbwt.com.

Sincerely yours,



Sarah H. Lorr

Enclosure

cc: Scott Levin, Esq.
Eric Soskin, Esq.
Baher Azmy, Esq.
Robert P. LoBue, Esq.
George Brent Mickum IV, Esq.
Shereef Hadi Akeel, Esq.
William Koegel, Esq.
John O'Connor, Esq.

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
District of Maryland

Suhail Najim Abdullah Al Shimari, et al.,
v.
CACI Premier Technology, Inc.
Civil Action No. 08-Civ-0827
(Pending in the Eastern District of Virginia)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Office of the General Counsel
United States Department of Homeland Security
Washington, DC 20258

X Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the
following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or
sampling of the material:

See attached Schedule A

Table with 2 columns: Place (George Brent Mickum IV Law Firm...) and Date and Time (April 22, 2013 10:00 a.m.)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or
other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting
party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation
on it.

Table with 2 columns: Place and Date and Time

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and
Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing
so, are attached.

Date: April 15, 2013

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Robert P. LoBue / SHL
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing Suhail Najim Abdullah Al Shimari,
et al., who issues or requests this subpoena, is: Robert P. LoBue, Patterson Belknap Webb & Tyler LLP,
rplobue@pbwt.com, (212) 336-2000 (phone), (212) 336-2222 (fax)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the subpoena unexecuted because _____; or

Other *(specify)*:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also rendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)**(c) Protecting a Person Subject to a Subpoena.**

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents,

communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

SCHEDULE A

Documents Requested

1. Documents sufficient to show why Suhail Najim Abdullah Al Shimari (AKA Suhail Najm Abdullah Shammari; Iraqi passport No. G2080226; DOB: Oct. 11, 1959), Taha Yaseen Arraq Rashid (AKA Taha Yaseen Arrak; Iraqi passport No. G2258066; DOB: Dec. 10, 1981), and Asa'ad Hamza Hanfoosh Al-Zuba'e (AKA Asaad Hamzah Hanfoosh Alnamri; Iraqi passport No. G2339256; DOB: July 1, 1973) (collectively, "Plaintiffs") were prevented from boarding Turkish Airlines flight number TK 0803 from Baghdad, Iraq to Istanbul, Turkey on March 15, 2013.
2. Documents sufficient to show whether, as of March 15, 2013, Plaintiffs were on a "No Fly List" or any other government security list inclusion on which may prevent Plaintiffs from flying into and/or the United States and, if so, on which date each of the Plaintiffs was added to any such list, the name of the list, and the agency responsible for the list.
3. Documents sufficient to show whether Plaintiffs are currently on a "No Fly List" or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States and, if so, on which date each of the Plaintiffs was added to any such list, the name of the list, and the agency responsible for the list.
4. Any documents, records, or communications concerning, relating to, relied upon in connection with, or showing any of the reasons for, the inclusion of Plaintiffs on any "No Fly List" or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States.
5. All communications between April 1, 2012 and the present between the Department of Homeland Security employees and any employees or agents or attorneys of CACI International, Inc., CACI Premier Technology, Inc., or any affiliates or subsidiaries thereof relating to Plaintiffs, including communications relating to Plaintiffs' plans or ability to travel to the United States and/or the inclusion of Plaintiffs on a "No Fly List" or any other government security list inclusion on which may prevent Plaintiffs from flying into the United States.

EXHIBIT 17

centerforconstitutionalrights
on the front lines for social justice

April 16, 2013

Sent via e-mail (DeBartoloDM@state.gov) and federal express

David M. DeBartolo
Attorney-Adviser
Office of the Legal Adviser, African and Near Eastern Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Mr. DeBartolo:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

I write to respectfully – and urgently – request the expedited processing of the renewed visa applications granting entry to the United States of Mr. Arrak (Application No. AA002Z3E41), Mr. Alnamri (Application No. AA002Z37HH), and Mr. Shammari (Application No. AA002Z39T5) – three of four plaintiffs in the above-referenced caption in the U.S. District Court for the Eastern District of Virginia before Honorable Judge Gerald Bruce Lee.¹ As set forth below, these three men had been granted visas to enter the United States in February 2013, and while it is my understanding that those visas remain valid, **I seek your assistance in having these renewed applications granted and assurances that Messrs. Arrak, Alnamri and Shammari will be given clearance to board a flight to the United States and granted entry into the United States, as each is under court order compelling their appearance at depositions to be conducted by the defendants in this litigation in the Eastern District of Virginia by April 26, 2013.²**

Mr. Arrak, Mr. Alnamri, and Mr. Shammari first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23,

¹ The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

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2013, and had their visa applications granted on February 23 and 24, 2013.³ (Copies of CCR's letters of support and the visa confirmations are attached as Exhibits B and C, respectively.)

Messrs. Arrak, Alnamri, and Shammari were scheduled to appear in Washington, D.C. for their depositions during the week of March 18, 2013. (*See* Exhibit D, April 10, 2013 Declaration of Baher Azmy setting out the details on plaintiffs efforts to travel to the United States). Round-trip tickets were purchased, departing Baghdad for Chicago via Istanbul on March 15, 2013 and returning from Washington, D.C. to Baghdad on March 24, 2013. After checking in and being issued their boarding passes in Istanbul, they were taken off the line to board the plane and told that the officials at the airport had received a call from the United States directing them to not allow the Baghdad Plaintiffs to board the plane and that the Baghdad Plaintiffs would have to resolve the problem in the United States.

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We stress that the United States government has supported the position of the plaintiffs in this case in urging that their claims should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI Int'l, Inc.*, No. 09-13335 (4th Cir. Jan. 14, 2012). We respectfully reiterate the exigency of our request – and the importance of this litigation – and ask your office to give it urgent attention.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

³ The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).

centerforconstitutionalrights
on the front lines for social justice

April 16, 2013

Sent via e-mail (LienhartTM@state.gov and LegalNet@state.gov) and federal express

Theodore Lienhart
Supervisory Post Management Officer: Iraq
Bureau of Near East Affairs
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Mr. Lienhart:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc., a wholly owned subsidiary of CACI International, Inc.

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Mr. Arrak, Mr. Alnamri, and Mr. Shammari first filed visa applications with the U.S. Embassy in Baghdad, Iraq on December 31, 2012, were interviewed on or about January 23,

¹ The fourth plaintiff, Salah Hassan Nsaif (Salah Hasan Nsaif Jasim Al-Ejaili), resides in Doha, Qatar, and has traveled to the United States in March 2013, following the issuance of his visa by the United States Embassy in Doha in January 2013.

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If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

³ The first visa applications were processed with the following application numbers: Mr. Arrak (AA002TFPTZ), Mr. Alnamri (AA002TFNAZ), and Mr. Shammari (AA002TFJXF).

centerforconstitutionalrights
on the front lines for social justice

April 16, 2013

Sent via e-mail (McLeodM@state.gov) and federal express

Mary McLeod
Acting Legal Adviser
Office of the Legal Adviser
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Acting Legal Adviser McLeod:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

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Respectfully,



Baher Azmy
Legal Director
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T: (212) 614-6427
bazmy@ccrjustice.org

Enclosures

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centerforconstitutionalrights
on the front lines for social justice

April 16, 2013

Sent via e-mail (RappSJ@state.gov) and federal express

Stephan Rapp
Ambassador-at-Large
Office of Global Criminal Justice
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Ambassador Rapp:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

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If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
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Enclosures

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centerforconstitutionalrights
on the front lines for social justice

April 16, 2013

Sent via e-mail (Searss@state.gov) and federal express

Uzra Zeya
Acting Assistant Secretary of State
Bureau of Democracy, Human Rights, and Labor
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Issuance of Non-immigrant Visas and Entry for Taha Yaseen Arrak, Asaad Hamzah Hanfoosh Alnamri, and Suhail Najm Abdullah Shammari to Appear for Litigation:
Al Shimari v. CACI Premier Technology, Inc., Civil Action No. 08-cv-0827

Dear Acting Assistant Secretary Zeya:

I am the Legal Director of the Center for Constitutional Rights (CCR), counsel to Taha Yaseen Arrak (Taha Yaseen Arraq Rashid), Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e), and Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shamari), who are plaintiffs in an important litigation proceeding in the United States on behalf of victims of Abu Ghraib torture against a private military contractor, CACI Premier Technology, Inc, a wholly owned subsidiary of CACI International, Inc.

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Enclosures

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EXHIBIT A

DATE: March 8, 2013 CASE NUMBER: 1:08cv00827 START 11:35

JUDGE: Lee ✓ REPORTER: R. Wilson ✓ END 12:40

PARTIES:

ATTORNEYS:

Suhail Najim Abdullah Al Shimari, et al.

Bahar Azme ✓

Brent Mickum ✓

Bob LoBue ✓

Dill Koegel ✓

John O'Connor ✓

v.

CACI International, Inc., et al.

THIS MATTER CAME ON FOR HEARING ON: _____

Conspiracy-granted.

Motion to Dismiss for Failure to State a Claim by CACI Premier Technology, Inc. and
Motion to Dismiss for Failure to State a Claim by CACI International, et al.

Findings stated. [Parent Co. employees] granted + dismissed w/ prejudice.
military - granted + dismissed w/out prejudice

Oral mot. to permit depts. to occur the week of March

18 - granted.

Order(s) to follow.

CIVIL MOTION HEARING MINUTES

DATE: April 12, 2013 CASE NUMBER: 08cv827 START 10:00
JUDGE: Lee REPORTER: R. Wilson END 11:12

PARTIES:

ATTORNEYS:

Suhail Najim Abdullah Al Shimari, et al.

George Mickum

Baher Azmy
Sherief Akceel

v.

CACI Premier Technology, Inc.

Bill Koegel

Joseph Shor for DOD
Eric Soskin
Scott Levin

THIS MATTER CAME ON FOR HEARING ON:

Deft's consent motion to seal

Deft's motion for sanctions [258] (Absence Pltffs in Iraq)

Deft's motion to compel [261] Deposition Discovery from the US

Pltffs' motion for extension of time to produce Pltffs for discovery

(Complete Pltffs' Depositions) [271]

Heard + granted, to 4-26-13, only. If Pltffs do not appear, the Court will have to make a Jgmt. @ that time.

Heard. Findings stated, + denied.

Heard. Findings stated. Denied. Order to follow.

EXHIBIT B

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on the front lines for social justice

December 31, 2012

VIA E-MAIL

United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Suhail Najm Abdullah Shammari (Application No. CEACAA002TFJXF) to Appear as a Witness in *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Suhail Najm Abdullah Shammari (Suhail Najim Abdullah Al Shimari) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Shammari (Application No. CEACAA002TFJXF) and to respectfully request the expedited processing of this application by your office. Mr. Shammari is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Shammari was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Shammari applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case's reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court's Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Shammari is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Shammari to the United States on two occasions: First, Mr. Shammari has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Shammari fails to appear, there may be serious consequences, up to and

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including dismissal of his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI, Int'l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Shammari, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures

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on the front lines for social justice

December 31, 2012

VIA E-MAIL

United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Asaad Hamzah Hanfoosh Alnamri (Application No. CEACAA002TFNAZ) to Appear as a Witness in *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Asaad Hamzah Hanfoosh Alnamri (Asa'ad Hamza Hanfoosh Al-Zuba'e) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Alnamri (Application No. CEACAA002TFNAZ) and to respectfully request the expedited processing of this application by your office. Mr. Alnamri is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Alnamri was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Alnamri applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case's reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court's Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Alnamri is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Alnamri to the United States on two occasions: First, Mr. Alnamri has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Alnamri fails to appear, there may be serious consequences, up to and including dismissal of

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his claims. We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI, Int'l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Alnamri, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures

centerforconstitutionalrights
on the front lines for social justice

December 31, 2012

VIA E-MAIL

United States Embassy Baghdad
Consular Section
Al-Kindi Street
International Zone
Baghdad, Iraq
BaghdadNIV@state.gov

Re: Non-immigrant Visa for Taha Yaseen Arrak (Application No. CEACAA002TFPTZ) to Appear as a Witness in *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827

Dear Sir or Madam,

I am the Legal Director of the Center for Constitutional Rights, co-counsel with Akeel & Valentine, to applicant Taha Yaseen Arrak (Taha Yaseen Arraq Rashid) in an important litigation proceeding in the United States. I write in support of the visa application of Mr. Arrak (Application No. CEACAA002TFPTZ) and to respectfully request the expedited processing of this application by your office. Mr. Arrak is one of four plaintiffs in a pending litigation in the United States District Court for the Eastern District of Virginia, entitled *Al Shimari v. CACI International, Inc.* Civil Action No. 08-cv-0827, and needs to appear in the United States for proceedings related to his case. The case involves the liability of an American corporation, CACI, for its role in torturing and abusing persons detained at Abu Ghraib prison. Mr. Arrak was detained at Abu Ghraib but released without charges of any sort by the United States military. A copy of Plaintiffs' First Amended Complaint, filed on September 15, 2008, is attached hereto as Exhibit A. A copy of Plaintiffs' Second Amended Complaint, dated December 26, 2012, is attached hereto as Exhibit B.

In October 2008, Mr. Arrak applied for a visa with the United States Embassy in Ankara, but that application was administratively closed due to inaction as the case had been delayed due to appeals filed in the United States Court of Appeals for the Fourth Circuit in 2009. Following the case's reinstatement to the trial court, the case is now proceeding with discovery. A copy of the court's Supplemental Discovery Order, dated November 6, 2012, is attached hereto as Exhibit C.

Mr. Arrak is required under United States law to appear and give testimony in this case in the District in which the case is pending, Alexandria, Virginia. We need to bring Mr. Arrak to the United States on two occasions: First, Mr. Arrak has been requested to appear for deposition in January 2013. A copy of the Notice of Deposition is attached hereto as Exhibit D. Second, we need him to appear for trial, which is likely going to occur in July or August 2013. If Mr. Arrak fails to appear, there may be serious consequences, up to and including dismissal of his claims.

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We wish to stress that the United States government, in proceedings occurring before the full en banc court of the United States Court of Appeals for the Fourth Circuit, supported the position of the plaintiffs in this case in urging that their claims of torture against the defendant should proceed to discovery and, potentially, trial. *See* Br. Am. Cur. United States, *Al-Shimari v. CACI, Int'l, Inc.*, No. 09-1335 (4th Cir. Jan. 14, 2012).

Mr. Arrak, who has family and employment in Iraq, has every intention of returning to his home country following the conclusion of legal proceedings in this case and CCR and its co-counsel, copied below, will provide all necessary financial support while he is in the United States and can guarantee his return at our expense.

If we can be of any further assistance or provide any additional information, please do not hesitate to let me know.

Respectfully,



Baher Azmy
Legal Director
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
T: (212) 614-6427
F: (212) 614-6499
bazmy@ccrjustice.org

cc: Shereef Akeel, Esq.
Akeel & Valentine
888 W. Big Beaver Rd., Suite 910
Troy, MI 48084-4748
Co-counsel for Plaintiffs in *Al-Shimari v. CACI*

Mohammed Alomari
Attorney and Counselor at Law

Enclosures

EXHIBIT C



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

BACK

VISA STATUS CHECK

Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Application Type
NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location
IRAQ, BAGHDAD

Application ID or Case Number
AA002TFJXF
(-9, AA0020AKAX or 2012118 345 0001)

Submit

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U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFJXF**
Case Creation Date: 23-Jan-2013
Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

Close



U.S. DEPARTMENT of STATE
CONSULAR ELECTRONIC APPLICATION CENTER

BACK

VISA STATUS CHECK

Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type

NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location

IRAQ, BAGHDAD

Application ID or Case Number

AA002TFNAZ

Submit

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[Copyright Information](#) [Disclaimers](#)



U.S. Department of State
NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFNAZ**

Case Creation Date: 23-Jan-2013

Status Updated Date: 24-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

[Close](#)



U.S. DEPARTMENT of STATE CONSULAR ELECTRONIC APPLICATION CENTER

BACK

VISA STATUS CHECK

Visa Status Check

Welcome! On this website, you can check your U.S. visa application status.

Visa Application Type

NONIMMIGRANT VISA (NIV)

Please select a location and enter your Application ID or Case Number.

Select a location

IRAQ, BAGHDAD

Application ID or Case Number

AA002TFPTZ

(e.g., AA0020AKAX or 2012118 345 0001)

Submit

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U.S. Department of State NONIMMIGRANT VISA APPLICATION

Issued

Application ID or Case Number: **AA002TFPTZ**

Case Creation Date: 23-Jan-2013

Status Updated Date: 25-Feb-2013

Your visa is in final processing. If you have not received it in more than 10 working days, please see the webpage for contact information of the embassy or consulate where you submitted your application.

For more information, please visit [U.S. Embassy Baghdad](#).

[Close](#)

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SUHAIL NAJIM)	
ABDULLAH AL SHIMARI <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-cv-0827 GBL-JFA
)	
CACI INTERNATIONAL, INC., <i>et al.</i> ,)	FILED UNDER SEAL
)	PURSUANT TO LOCAL CIVIL
Defendants)	RULE 5
)	
)	
)	

DECLARATION OF BAHER AZMY, ESQ.

I, Baher Azmy, hereby declare as follows:

1. I am the Legal Director of the Center for Constitutional Rights in New York, New York and counsel to the four plaintiffs in the above-captioned action. I have been admitted to appear *pro hac vice* in this action. I submit this Declaration in opposition to Defendant’s Motion for Sanctions against Plaintiffs Suhail Najim Abdullah Al Shimari, Asa’ad Hamza Hanfoosh Al-Zuba’e, and Taha Yaseen Araq Rashid.

2. Plaintiffs Suhail Najim Abdullah Al Shimari, Asa’ad Hamza Hanfoosh Al-Zuba’e, Taha Yaseen Araq Rashid, and Salah Hasan Al-Ejaili are Iraqi citizens who suffered torture and abuse while in U.S. custody in Abu Ghraib prison, and allege that CACI interrogators and supervisors operating in Abu Ghraib bear responsibility for Plaintiffs’ mistreatment.

3. Plaintiffs Al Shimari, Al-Zuba'e, and Rashid all currently reside in Iraq, either in or near Baghdad (collectively, the "Baghdad Plaintiffs"). Plaintiff Al-Ejaili currently resides in Doha, Qatar.

4. As foreign nationals, Plaintiffs are not permitted entry into the United States without a visa issued by the United States Department of State.

5. Plaintiffs submitted visa applications in 2008 at the U.S. Embassy in Ankara, Turkey (apparently, the U.S. Embassy in Baghdad was not then able to process visas) in anticipation for appearing in this litigation. Attached as Exhibit 1 are true and correct copies of Plaintiffs' 2008 visa applications. Discovery in this action was subsequently stayed.

6. Immediately following the status conference before this Court on October 12, 2013, my then co-counsel, Susan Burke, Esq., began to re-engage Plaintiffs in their visa application process in anticipation of the Court's lifting of the stay of discovery. Counsel believed that as litigation visas typically only last one year, it could have been premature to actually obtain visas prior to the entry of a discovery order, without more certainty about the scheduling of discovery and a potential trial.

7. Following the Court's lifting of the stay of discovery on November 6, 2012, counsel for Plaintiffs planned to meet with the Plaintiffs in Istanbul, Turkey during the week of November 26, 2012, to discuss the status of the case and to ascertain further information about the filing and status of Plaintiffs' 2008 visa applications. Plaintiffs' counsel were concerned about applying for visas anew, when applications may have been pending with the U.S. Embassy. Plaintiffs' counsel believed the utmost caution was necessary in processing these visas, lest a mistaken filing cause significant processing delay or lead to outright denial. However, the trip needed to be postponed due to scheduling difficulties.

8. On or about December 3, 2012, Susan Burke, Esq., who had been lead counsel for Plaintiffs throughout this litigation, concluded that she would be withdrawing from the case, and informed Plaintiffs' counsel and Defendants' counsel of this. She ceased working on the case since that date.

9. During the week of December 10, 2012, I and several co-counsel traveled to Istanbul, Turkey to meet with all four Plaintiffs. Counsel discussed with Plaintiffs – and our Iraqi coordinator, who has assisted with all aspects of this and other Abu Ghraib litigations since 2004 – the process and content of any prior applications for visas to enter the United States in connection with this litigation. During that trip, Plaintiffs' counsel confirmed that the Baghdad Plaintiffs has previously submitted visa applications in 2008. *See Ex. 1.*

10. After returning from Istanbul, between December 17 and December 26, Plaintiffs' counsel sought to confirm the status of the Baghdad Plaintiffs' 2008 visa applications. Ascertaining this information was not an efficient process. For example, during the time period in which we attempted to reach it, the visa office at the U.S. Embassy in Ankara handled such inquiries for only one hour per day, between 4:00-5:00 a.m. Eastern Standard Time. We endeavored to ensure we were following the correct process, lest U.S. Embassy officials suspected us of filing duplicative or fraudulent petitions in separate Embassy locations.

11. Having been unsuccessful in connecting with a consular officer who could verify the status of the 2008 visas during calls on December 20th (when we learned of the limited hour to speak with a consular officer) and December 24th (when the Embassy was closed), on December 26, 2012, in a conversation with a consular official in Ankara, we were informed that Plaintiffs' prior visa applications submitted in 2008 were, in fact, administratively closed in 2009, and we should file new visa applications for the Plaintiffs. As the Baghdad Plaintiffs

could now file visas with the U.S. Embassy in Baghdad and Plaintiff Al-Ejaili could file in Doha, and filing in their respective cities would facilitate Plaintiffs' timely appearance for visa interviews without the logistical effort – an opportunity for possible delay – of flying Plaintiffs to Ankara, Plaintiffs' counsel worked with Plaintiffs in submitting visa applications to the U.S. Embassies in Baghdad and Doha without delay.

12. At the same time, on December 17, 2012, William Koegel, Esq., counsel for Defendant, emailed me to request dates for depositions for Plaintiffs in January, 2013 in the Eastern District of Virginia. I responded by email dated December 18, 2012, that Plaintiffs were in the process of applying for visas and that, because the decision of whether and when to grant a visas to Plaintiffs was obviously out of Plaintiffs' control, I could not predict when they would be available. I suggested that March was a more realistic time frame to ensure their availability. I also offered to make Plaintiffs available for depositions in Istanbul in January if Defendants wished to go forward with their depositions that month. Plaintiffs' counsel did not believe that suggesting Istanbul as a possible venue for deposition would pose a problem to Defendant's counsel [REDACTED]

13. By email dated December 19, 2012, Mr. Koegel attributed delay in this litigation to Plaintiffs, and asked that counsel inform him “specifically and in detail, exactly what Plaintiffs and their counsel have done for Plaintiffs to be able to appear in this country in this action and when each action was taken.” I responded on December 20, 2012, by objecting to attribution of blame for the delay in the litigation to Plaintiffs, resisting Defendant's demand “for an accounting of our efforts” to obtain visas, and to reiterate that “we are in the process of obtaining visas for the plaintiffs (the outcome and timing of which, as you know, are not fully within

Plaintiffs control) and we fully intend to make them available in E.D.Va for depositions before the conclusion of the discovery period.” I also reaffirmed our commitment to make all of the Plaintiffs available for depositions in Istanbul in the meantime. Attached as Exhibit 2 is a true and correct copy of counsel’s email correspondence between December 19 and December 21, 2012.

14. On December 25, 2012, Plaintiff Al-Ejaili’s visa application was completed and submitted to the U.S. Embassy in Doha, Qatar. Attached as Exhibit 3 is a true and correct copy of the State Department’s confirmation of receipt of Plaintiff Al-Ejaili’s visa application submitted in 2012.

15. On December 27, 2012, counsel for Plaintiffs submitted a letter to the U.S. Embassy in Doha, requesting expedited processing of Plaintiff Al-Ejaili’s visa application. The letter described the proceedings in this case and the need to travel to this District for deposition and trial, and attached, as exhibits, Plaintiffs’ First and Second Amended Complaints and this Court’s November 6 Discovery Order. Attached as Exhibit 4 is a true and correct copy of the letter submitted by Plaintiffs’ counsel to the U.S. Embassy in Doha.

16. On December 28, 2012, counsel for Defendant served Notices of Depositions for all four Plaintiffs, scheduling them for consecutive days in the Eastern District of Virginia, between January 28 and February 1, 2013.

17. On December 31, 2012, visa applications for the Baghdad Plaintiffs were completed and submitted to the U.S. Embassy in Baghdad, Iraq. Attached as Exhibit 5 are true and correct copies of the State Department’s confirmations of receipt of the Baghdad Plaintiffs’ visa applications submitted in 2012.

18. Also on December 31, 2012, Plaintiffs' counsel submitted letters to the U.S. Embassy in Baghdad, requesting expedited processing of the Baghdad Plaintiffs' visas. Those letters were substantively identical to the letter counsel sent in support of Plaintiff Al-Ejaili's visa application, except that they also attached the Notices of Depositions since served on each of the Baghdad Plaintiffs, in order to underscore the exigency of Plaintiffs' visa requests.

19. Thereafter, the U.S. Embassy in Doha scheduled an interview of Plaintiff Al-Ejaili on January 9, 2013. The U.S. Embassy scheduled interviews of the Baghdad Plaintiffs and our Iraqi coordinator on or about January 23, 2013. Attached as Exhibit 6 are true and correct copies of notifications of Plaintiffs' interviews with their respective embassies. All interviews took place on their scheduled dates. Plaintiffs at that point did not know how long it would take the visas to be processed following their interviews.

20. On January 9, 2013, I sent a letter to Mr. Koegel, counsel for Defendant, within the time frame contemplated by Local Rule 26(C), advising him that Plaintiffs objected to the Notice of Depositions insofar as all of the Plaintiffs would likely not have their visas in time to travel to the U.S. for the dates noticed. The letter affirmed Plaintiffs' intention to appear in the Eastern District of Virginia and pledged to advise Defendants when the visas were completed, so Plaintiffs could sit for their depositions. The letter reiterated an offer to make Plaintiffs available for depositions in Istanbul, Turkey or Erbil, Iraq (in the semi-autonomous Kurdish area). Attached as Exhibit 7 is a true and correct copy of the January 9 letter I sent to Mr. Koegel.

21. Defendant did not respond to this letter in any way – in writing or by phone. In subsequent conversations, Defendant did not raise the issue of Plaintiffs' depositions or inquire about the status of Plaintiffs' visas or propose to take depositions in the other locations Plaintiffs suggested. In fact, in a series of emails between Plaintiffs' and Defendant's counsel discussing

outstanding discovery issues and scheduling a time and agenda for a meet-and-confer, Defendant's counsel did not inquire into Plaintiffs' availability or otherwise indicate any interest in discussing or resolving the timing or location of Plaintiffs' depositions.

22. On January 14, 2013, Plaintiff Al-Ejaili was informed by the U.S. Embassy that his visa application was approved. From January 10 to 13, Plaintiff Al-Ejaili had traveled to Erbil, Iraq to be examined by Plaintiffs' medical expert retained for this litigation, and from January 15 to February 7, 2013, he was sent on assignment in Sierra Leone as a reporter for Al Jazeera Network. Even if Defendant had indicated that it wished to proceed with the depositions of the four plaintiffs separately, Plaintiff Al-Ejaili would likely not have been available to attend a deposition in the United States on February 1, 2013, pursuant to Defendant's notice.

23. Upon Defendant's motion, this Court issued an order on February 14, 2013 compelling Plaintiffs to appear in the Eastern District of Virginia for depositions and medical exams, within 30 days. Following the issuance of this order, Plaintiffs' counsel worked diligently with State Department officials in Washington, D.C., in the Office of the Legal Advisor and the in the Bureau of Democracy, Human Rights and Labor, to expedite the processing of the Baghdad Plaintiffs' visas. Attached as Exhibit 8 is a true and correct copy of a letter I sent to the Department of State on February 15, 2013, as well as a true and correct copy of the FedEx slip confirming the mailing of this letter.

24. By February 25, 2013, all four Plaintiffs' applications for visas to the United States were granted. Attached as Exhibit 9 are true and correct copies of screenshots taken from the Department of State's Consular Electronic Application Center "Visa Status Check" system showing that the Baghdad Plaintiffs' 2012 visa applications were granted.

25. Plaintiff Al-Ejaili appeared, without incident, in the United States for a medical examination and deposition during the week of March 4, 2013. He left the United States on March 6, 2013.

26. I worked with Defendant's counsel to schedule the Baghdad Plaintiffs' travel for a week during which both depositions and medical examinations could be held. Counsel for all parties agreed to the Baghdad Plaintiffs appearing for depositions during the week of March 18, 2013.

27. During a hearing on March 8, 2013, counsel moved jointly in asking the Court to modify its February 14, 2013 Order to allow depositions to be held during the week of March 18th. The Court granted that motion.

28. The Baghdad Plaintiffs' depositions and medical examinations were scheduled to take place throughout the week of March 18, 2013.

29. Round-trip airline tickets were purchased for the Baghdad Plaintiffs to travel from Baghdad to the United States on Friday, March 15, 2013, on Turkish Airlines, at a cost of approximately \$2,191.00 per ticket. A ticket was also purchased for our Iraqi legal-team member, who was to escort the Baghdad Plaintiffs to their connection in Istanbul, Turkey and assist them with their connection to the United States. The Iraqi team member is not a plaintiff in the case, and was not scheduled to be deposed. Attached as Exhibit 10 is a true and correct copy of the receipt for the purchase of those tickets.

30. In advance of the Baghdad Plaintiffs' travel, Plaintiffs' counsel coordinated with an official from the Department of Homeland Security Transportation Security Administration (TSA) to assist the Baghdad Plaintiffs upon arrival in the United States because none of them speak English and have extremely limited experience with air-travel and international travel.

Attached as Exhibit 11 is a true and correct copy of email correspondence between my co-counsel and a TSA official. Plaintiffs' counsel also provided the Baghdad Plaintiffs with a letter explaining the nature of their travel. Attached as Exhibit 12 are true and correct copies of the letters given to the Baghdad Plaintiffs to carry on their persons while traveling.

31. Plaintiffs arrived at the Baghdad airport, with a travel itinerary that would take them to Chicago, via Istanbul, Turkey. They were scheduled to arrive in Chicago the evening of March 15, 2013, where they would be picked up by Plaintiffs' counsel and an interpreter who reside in Detroit; this group was scheduled to travel together to Washington, D.C. on Sunday, March 17, in advance of the depositions scheduled that week.

32. The Baghdad Plaintiffs received boarding passes for their connecting flight to Istanbul. Attached as Exhibit 13 are true and correct copies of the Baghdad Plaintiffs' boarding passes. After being issued their boarding passes, the Baghdad Plaintiffs proceeded to the gate to board their plane. Before boarding, the Baghdad Plaintiffs were taken for questioning, and subsequently informed that the airport agents had received a call from the United States directing them to not allow the Baghdad Plaintiffs to board the plane and that the Baghdad Plaintiffs would have to resolve the problem in the United States.

33. After being informed that the Baghdad Plaintiffs were not permitted to travel in the early morning of March 15, Plaintiffs' counsel contacted both their contact at the TSA who had arranged for a TSA agent to meet the Baghdad Plaintiffs upon their arrival in the United States and the official at the Department of State (Ms. Kelly Landry, Foreign Affairs Officer in the Bureau of Democracy, Human Rights, and Labor) who had been my primary contact in relation to efforts to expedite the Plaintiffs' visa processing.

34. Since March 15, Plaintiffs' counsel has been working with and through Ms. Landry to resolve what has been explained to me as an inter-agency miscommunication regarding the Baghdad Plaintiffs and their travel to the United States.

35. As advised by the Department of State, despite being in possession of valid U.S. visas, the Baghdad Plaintiffs reapplied for visas to the United States on March 16, 2013, in order to allow for the necessary inter-agency communication and coordination, which had failed to occur when the visas were granted in February. Attached as Exhibit 14 are true and correct copies of confirmations of the State Department's receipt of the Baghdad Plaintiffs' 2013 visa applications.

36. The Baghdad Plaintiffs were then contacted by U.S. officials at the U.S. Embassy in Baghdad and advised to proceed to the Embassy for interviews on the next business day in Iraq, i.e., on Sunday, March 17. The Baghdad Plaintiffs appeared for their interviews on that date.

37. Over the following week of March 18, Plaintiffs' counsel remained in daily, regular phone and email contact with the State Department, through Ms. Landry. Plaintiffs' counsel provided requested information in response to updates on the Baghdad Plaintiffs' travel, including providing an itinerary for travel to the United States on March 26, 2013, following an update that the Baghdad Plaintiffs' visas would likely be processed and available for pick-up on Sunday, March 26.

38. I was informed by Ms. Landry on Friday, March 22, 2013, that the inter-agency coordination was continuing and that additional time would be needed to resolve the matter. She advised me that another government agency has taken the position that the Court's Order regarding the appearance of Plaintiffs for deposition has expired and that this agency need not

therefore even consider the renewed request for Plaintiffs' entry into this country, and that the issuance of a new order by the Court – as soon as possible – is necessary to facilitate the processing of the Baghdad Plaintiffs' application to enter the United States.

39. Later that day, on March 22, 2013, Plaintiffs filed a motion with this Court, seeking an enlargement of time to complete Plaintiffs' depositions, until April 5, 2013. Dkt. 231. Plaintiffs emphasized in their motion papers that, while we believed that setting an April 5, 2013 deadline would be useful in getting the relevant government agencies to act quickly, we had no assurance that the process would in fact be completed by April 5, 2013. As such, Plaintiffs noted that, should the process carry beyond April 5, 2013, Plaintiffs would keep the Court apprised of developments and requested that granting of an extension should be without prejudice to a subsequent request for additional time.

40. Specifically, Plaintiffs stated in the Memorandum of Law Supporting the Motion: "Plaintiffs understand that while a reasonable deadline – which Plaintiffs suggest would be April 5, 2013 – would put necessary pressure on the U.S. government to act on Plaintiffs' visa applications, there is a possibility that the applications may not be fully processed in time for Plaintiffs to appear by April 5." Dkt. 232 at 6. Accordingly, Plaintiffs would respectfully request that an order setting the deadline not preclude a subsequent enlargement of time, should Plaintiffs be able to represent that Plaintiffs' entry and appearance for depositions could occur after the April 5th deadline. *Id.* at 6. *See also id.* at 7 ("Plaintiffs respectfully request that the Court grant Plaintiffs' motion, and extend the period of time by which the Baghdad Plaintiffs must make themselves available for deposition to April 5, 2013, without precluding Plaintiffs from seeking a subsequent enlargement if it appears that approval for Plaintiffs' entry into the United States is delayed beyond April 5, 2013 without fault of Plaintiffs.").

41. On March 27, 2013 (in the early evening), the Court granted Plaintiffs' motion, extended the deadline to appear for depositions to April 5, 2013, and ordered Plaintiffs to continue to work with the Department of State to ensure Plaintiffs' timely arrival.

42. That same day, on March 27, 2013, I emailed a copy of this Court's Order to Ms. Landry.

43. On March 28, 2013, I communicated with Ms. Landry by telephone. She informed me that, despite the Court's order, it was unlikely that the Plaintiffs would have approval to travel by April 5. She advised me that we should make reservations with a specific itinerary in order to move forward with resolving issues related to the Baghdad Plaintiffs' entry to the United States.

44. On March 29, 2013, Plaintiffs' counsel provided the Department of State with an itinerary for the Baghdad Plaintiffs to travel to the United States. Based on the advice of Ms. Landry, we scheduled the itinerary so the Plaintiffs would arrive in Washington, D.C. three weeks from that date, i.e., on April 19, 2013, and to leave the United States on April 27, 2013.

45. Since then, Plaintiffs' counsel regularly contacted Ms. Landry, by telephone and email, to inquire about any updates on the status of the Baghdad Plaintiffs' travel to the United States.

46. As of today, the Department of State's Consular Electronic Application Center "Visa Status Check" system continues to show the Baghdad Plaintiffs' visa applications as in the "Administrative Processing" stage, with the last status update on March 17, 2013. Attached as Exhibit 15 are true and correct copies of screenshots of the U.S. State Department's website showing the status of the Plaintiffs' visas on April 10, 2013.

47. At no time during numerous communications with State Department officials has Plaintiffs' counsel been informed that the Baghdad Plaintiffs are on a watch-list or any database that would cause them to be denied entry into the United States.

48. Despite its queries to State Department officials, Plaintiffs' counsel has never been informed of the name of the government agency with which the inter-agency coordination supposedly had failed to occur. Nor has Plaintiffs' counsel ever learned the identity of the person or entity that called the airport agents in Baghdad and directed them to prevent the Baghdad Plaintiffs from boarding their flight on March 15, 2013.

49. The Baghdad Plaintiffs continue to be available for video depositions at any time, or for live depositions in Istanbul, Turkey.

50. Attached as Exhibit 16 are true and correct copies of the documents produced by the Department of Defense in this litigation related to Plaintiff Al Shimari: DOD-00136; DOD-00149; DOD-00150; DOD-00200; DOD-00215; DOD-00218; DOD-00262; DOD-308; DOD-00323; DOD-00326.

51. Attached as Exhibit 17 are true and correct copies of the documents produced by the Department of Defense in this litigation related to Plaintiff Rashid: DOD-00004; DOD-00005; DOD-00016; DOD-00041; DOD-00061; DOD-00065.

52. Attached as Exhibit 18 are true and correct copies of the documents produced by the Department of Defense in this litigation related to Plaintiff Al-Zuba'e: DOD-00106; DOD-00107; DOD-00108.

53. [REDACTED]

54. Attached as Exhibit 19 is a true and correct copy of a document produced by the Department of Defense in this litigation related to Plaintiff Al-Ejaili: DOD-00130.

55. Attached as Exhibit 20 is a true and correct copy of the expert report of Professor Geoffrey Corn submitted in this litigation on February 1, 2013.

56. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2013
New York, New York



Baher Azmy

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2013, I electronically filed the Plaintiffs' DECLARATION OF BAHER AZMY through the CM/ECF system, which sends notification to counsel for Defendant.

/s/ George Brent Mickum
George Brent Mickum IV (VA Bar # 24385)
LAW FIRM OF GEORGE B. MICKUM IV
5800 Wiltshire Drive
Bethesda, MD 20816
Telephone: (202) 281-8662
gbmickum@gmail.com