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IN *BOUMEDIENE V. BUSH*

The Supreme Court's *Boumediene v. Bush* Decision and Habeas Proceedings for Guantanamo Prisoners

BEFORE THE

HOUSE ARMED SERVICES COMMITTEE

JULY 30, 2008

Introduction

Thank you Chairman Skelton, Ranking Member Hunter, and Members of the House Armed Services Committee for inviting me to speak with you today on this vitally important issue. All counsel to Guantanamo prisoners are grateful for the time, energy and thought that this Committee is devoting to the issues presented by the imprisonment of our clients, who have now been held at Guantanamo Bay for more than six and a half years.

My name is Stephen H. Oleskey and I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr. I have been a member of the Massachusetts Bar since 1968 and am also admitted in New York and New Hampshire. I previously served as Massachusetts Deputy Attorney General and Chief of that office's Public Protection Bureau. My practice generally focuses on complex civil litigation.

My experience in the critical matter before this Committee arises from my role as co-lead counsel and pro bono advocate for six Guantanamo prisoners in the period since July 2004, following the decisions of the United States Supreme Court in the *Rasul* and *Hamdi* cases. Our clients' appeal, *Boumediene v. Bush*, was decided by the U.S. Supreme Court on June 12, 2008.[1]

In October of 2001, our clients, all Algerians by birth, were working and living with their wives and children in Bosnia and Herzegovina—an American ally. None was politically active, and none had any record of terrorist-related activities or associations. Five of the six men worked for Muslim-affiliated charitable organizations involved in the U.S.-led reconstruction of Bosnia after the war.

In the immediate aftermath of 9/11, as United States government facilities overseas were put on high alert to identify potential follow-on attacks, Islamic-affiliated charitable organizations with Middle Eastern ties came under close scrutiny. In early October of 2001, the United States Embassy in Sarajevo contacted Bosnian police with a rumor that people in Bosnia were plotting an attack on the Embassy and demanded that Bosnian police arrest our clients and others. Since the United States provided no evidence to support its allegations, Bosnian authorities resisted. However, the U.S. Chargé d'Affaires Christopher Hoh threatened to close the United States Embassy and withdraw all U.S. forces and support for the peace process unless Bosnian authorities arrested our clients, and the Bosnians capitulated.

In the three-month international investigation that ensued, not a single piece of evidence linking our clients to this or any other terrorist activity was uncovered, and in January of 2002 the Bosnian Supreme Court ordered our clients' release. That same day, amid rumors that our clients would either be forcibly deported to Algeria or handed over to the United States to be sent to a new U.S. prison at Guantanamo Bay, Cuba, the Human Rights Chamber Court of Bosnia and Herzegovina (which had been established at the U.S. sponsored Dayton Peace Accords as the final authority on human rights in Bosnia) issued an order requiring the Bosnian government to take all necessary steps to prevent our clients from being taken out of the country. Nevertheless, as our clients were about to leave the Central Jail in Sarajevo, they were seized illegally and turned over to the U.S. military. In a harrowing 30-hour trip in which they were stripped naked, subjected to invasive medical exams, short shackled by their hands and wrists, blinded and

[1] *See Boumediene v. Bush*, 128 S. Ct. 2229 (2008).

deafened by sensory deprivation helmets, and verbally and physically abused, the men were flown to the just-opened Camp Delta facility at the U.S. Naval Base at Guantanamo Bay, where they have been held since January 20, 2002. Our clients have now been imprisoned for six and a half years without charge, much less trial, and without being shown any evidence against them.

These six and a half years at Guantanamo have seen our client Mustafa Ait Idir pepper sprayed and beaten, his shackled fingers twisted until they broke, his face lowered into a toilet bowl and pounded to the point of paralysis and permanent nerve damage – all from gratuitous attacks by rogue guards at Guantanamo. They have seen our client Saber Lahmar's muscles atrophy and his psychological well-being decline precipitously during the two years he has spent confined to an 8' x 6' concrete cell in near complete isolation, cut off from human contact, physical activity, and all natural light. And they have seen our client Lakhdar Boumediene—now entering the eighteenth month of his hunger strike protesting against the injustices he has suffered at Guantanamo—painfully force-fed twice every day through a 43-inch tube that is excruciatingly inserted into his nostril and down into his stomach.

Our clients have been separated from their families for nearly seven years. Saber Lahmar, Hadj Boudella, and Mustafa Ait Idir each have children whom they have never met. Hadj Boudella was absent during the illness and eventual death of his daughter Sajmaa, who died of a heart defect in early 2006. Mr. Boudella learned of her death from me during a visit.

I am here today to speak about the legal process involving these six men and about 200 others still held at Guantanamo. The government has never produced any reliable evidence that our clients ever had anything to do with Al Qaeda. It has never produced any evidence that any of these men had ever taken up arms against the United States or participated in any form in any violent action against the United States. And it has never produced any evidence that any of these men is implicated in any way with the horrible events of 9/11 or with the ensuing war in Afghanistan, much less with the war in Iraq which began well after they had been confined in Guantanamo.

On June 12, 2008, in *Boumediene v. Bush*, the United States Supreme Court finally gave these men a voice. First denied legal representation and then denied access to the courts, our clients endured a more than six-year legal saga that resulted in one of the most important Supreme Court decisions of our generation. I was asked to come here today to talk about this decision and what it means both for these men and for our system of government.

On a fundamental level, *Boumediene* is about the limits of executive authority to imprison. It is about rejecting, in Justice Kennedy's words, the notion that the President has "the power to switch the Constitution on and off at will."[2] For nearly seven years this Administration had sought to create a law-free zone, hiding behind the War on Terror and the pretense of Cuban legal sovereignty over Guantanamo Bay to justify seizing hundreds of people around the world and indefinitely imprisoning them at Guantanamo. On June 12, the Supreme Court reaffirmed its role in our tripartite system of Government and gave these men the opportunity to have their habeas challenges heard in court before an Article III federal judge.

[2] *Boumediene*, 128 S. Ct. at 2258.

It should give us pause that *Boumediene* was a controversial or even a difficult decision, for what the Court has ordered is in fact quite modest. All that the Supreme Court has guaranteed is that the Government must provide credible evidence justifying why it can lawfully seize someone in a foreign country, involuntarily fly him halfway around the world, indefinitely detain him in a prison that it controls, and subject him to harsh interrogation techniques designed to break down his psychological defenses and render him helpless and compliant. The Court did not say that the President could not detain these people indefinitely; nor that they could not be brought to Guantanamo; nor that they could not be interrogated. In essence, all the Court said was that when the President does these things, these men have the right to go to court at some reasonable time and ask a federal judge to determine if further detention is justified.

On another level, the *Boumediene* decision did more than merely grant these six men their long overdue day in court. *Boumediene* also revived a principle all but dormant in American politics and law since Sept. 11, 2001: that peace and liberty are not mutually exclusive; that security is not necessarily borne of curtailed rights and increased police and military presence in our daily lives; and that, as the Court wrote, "[s]ecurity subsists, too, in fidelity to freedom's first principles. Chief among these are freedom from arbitrary and unlawful restraint and the personal liberty that is secured by adherence to the separation of powers."[3]

Yet this principle is once again threatened as the Administration seeks to frustrate and undo the gains achieved in *Boumediene*. Under the pretense that the Supreme Court did not provide sufficient guidance for federal district courts to hear and decide these cases, the Administration now urges Congress to pass legislation that removes the decision-making process from the federal courts and for the third time following a Supreme Court decision attempts to limit the contours of a review process for Guantanamo prisoners.

The arguments that federal district courts are unfit to resolve these disputes is disingenuous and unfounded. In the few short weeks since the Supreme Court issued its opinion on June 12, federal district courts have already proved themselves capable of resolving these matters promptly, fairly, and justly, without compromising national security interests. Cases are proceeding expeditiously, with the promise of resolution of many, if not all, cases within the calendar year. Any Congressional intervention at this point would provide confusion instead of clarity and would subject these men to further undue delay in finally receiving their day in court.

I. BACKGROUND TO THE DECISION

Boumediene needs to be understood in conjunction with several other decisions in which the Supreme Court and lower federal courts have rejected the Executive's post-9/11 effort to arrogate increasingly more power for itself at the expense of the two other branches and of the American people.

In 2001, shortly after the September 11th attacks, the Afghan Northern Alliance captured Yaser Hamdi, an American citizen, on the battlefield in Afghanistan and turned him over to U.S. authorities. Three years later, when Mr. Hamdi's case reached the United States Supreme Court, the Court found that if the President decides to imprison a citizen as a supposed "enemy

[3] *Boumediene*, 128 S. Ct. at 2277.

combatant," he must provide the prisoner with a meaningful opportunity to contest his confinement.

Around the same time that Mr. Hamdi was arrested, men captured in various locations around the world by the United States or its allies were brought to a newly constituted prison camp at Guantanamo Bay. The Administration initially contended that these men retained no constitutional rights and could have no access to American courts because sovereignty over Guantanamo resided exclusively in Cuba. On the same day Mr. Hamdi's case was decided, the Supreme Court issued an opinion in *Rasul v. Bush* rejecting the Government's arguments and recognizing both that prisoners at Guantanamo had a right to legal counsel and that they had a statutory right to bring habeas actions in federal court to challenge the constitutionality of their confinement.

Lawyers from around the country immediately volunteered to represent the prisoners at Guantanamo and began filing suit in the District of Columbia District Court, arguing that their confinement was unauthorized by law. Some cases came before Judge Joyce Hens Green, who in January 2005 found that the habeas petitions stated valid claims of unlawful confinement and that their habeas actions should proceed to trial. Others, including our clients, had their cases heard by Judge Richard Leon, who granted the Government's motion to dismiss in January of 2005, holding that Guantanamo prisoners had no constitutional rights and, moreover, that Congress' Authorization for the Use of Military Force Resolution of September 18, 2001 authorized the President to take such actions.

While appeals were underway, the Administration sought alternative avenues to frustrate the relief sought in the lawsuits by asking Congress to bar the federal courts from hearing habeas applications from Guantanamo prisoners. Congress responded with the Detainee Treatment Act of 2005; and, when the Supreme Court held that the Act did not apply to already-filed cases, Congress passed the Military Commissions Act of 2006 which clarified and expanded the habeas stripping of the Detainee Treatment Act. The DTA and MCA, as these statutes are commonly known, barred prisoners from voicing their complaints in federal court through the age-old procedure of habeas corpus, a procedure that has been central to the Anglo-American legal system since the Magna Carta. Instead, they set up a limited review procedure in the U.S. Court of Appeals for the D.C. Circuit, which was given the right to make only a limited and circumscribed review of the decisions of Combatant Status Review Tribunals which had been held in Guantanamo in the Fall of 2004.

The Combatant Status Review Tribunal, or CSRT, bears little resemblance to a court. Indeed, it bears little resemblance to any agency tribunal or adjudicative body formed under law. It is not a creature of statute; Congress has never authorized the formation of a single CSRT. Instead, the CSRT was created by Deputy Secretary of Defense, Paul Wolfowitz, by a memo in July 2004. The CSRT was designed to give the appearance of process without fairness or any meaningful protection. Prisoners taken before a CSRT are forbidden from being represented by lawyers – even *pro bono* counsel at no cost to the government. They are not permitted to see any of the classified evidence against them. Any evidence the Government presents is presumed genuine and accurate. Hearsay is admissible and, indeed, is the norm; I am not aware of any case in which the Government called a live witness before a CSRT. Prisoners, for their own part, can only present witnesses that the Government finds to be "reasonably available" in Guantanamo,

which in the past has excluded people whom counsel subsequently located with a simple phone call. It is astonishing that, under those conditions, these CSRTs actually rendered decisions in favor of some prisoners, finding that they were not "enemy combatants" even on the skewed, one-sided record the Government presented. In some of those cases, however, the Government simply convened a different Combatant Status Review Tribunal that was pressured to render the decision the Government wanted.

The DTA and MCA replaced habeas corpus fact finding hearings before a federal District Court judge with a very limited review of the CSRT proceeding. Under the DTA and MCA, the D.C. Circuit was to determine whether the CSRT decision was valid. But the D.C. Circuit procedure did not allow the prisoner to present evidence of his own, including evidence that counsel found through subsequent investigations. And the DTA and MCA did not allow the D.C. Circuit to order a petitioner's release or transfer; according to the Department of Justice's arguments, all that the court could do was remand the case for a new CSRT to hear the Government's secret evidence again.

II. *BOUMEDIENE V. BUSH*, 128 S. Ct. 2229 (2008)

After our clients' habeas cases were dismissed in January 2005, we promptly appealed to the D.C. Circuit, which held 2-1 in 2007 that the MCA had stripped all federal courts of jurisdiction to consider habeas corpus applications and that the Suspension Clause of the Constitution, which forbids the suspension of habeas corpus except in the case of rebellion or invasion, did not apply to our clients since they were aliens imprisoned outside of the United States. Since the D.C. Circuit found that our clients lacked any right to habeas review, the Circuit did not consider whether the DTA review procedure was an adequate substitute for the habeas corpus rights enshrined in the Constitution.

The Supreme Court initially declined to hear our clients' case in early 2007. However, only a few months later, in June 2007, the Court made the almost unprecedented decision to hear their appeal after all. The two principle issues facing the Court were: first, whether our clients, as aliens held in a place where the United States Government maintained effective control but lacked technical sovereignty, were entitled to the right to habeas corpus; and, second, whether the D.C. Circuit review of the CSRT procedures established by the Administration in the summer of 2004 was an adequate substitute for the right of habeas corpus.

The core of the Supreme Court's decision was that Guantanamo prisoners have a constitutional right to bring habeas actions in federal court to challenge their confinement, and that the DTA review of CSRTs was not an adequate substitute for that right. The court therefore held that the Congressional attempt to strip habeas corpus in the MCA, without an adequate replacement, was unconstitutional. This is the first time in U.S. history that the Court has struck down an Act of Congress under the Suspension Clause of the Constitution, Article I, Clause 9.

One of the principal factors underlying the Court's decision was that the Administration had brought prisoners to Guantanamo precisely to avoid federal judicial oversight. In our system of checks and balances, the Court plays a essential role in guarding against executive overreaching – a role that would be eviscerated were this or any Executive free to create holding spaces outside the U.S. where it could warehouse aliens indefinitely without concern for any judicial

oversight. The Court therefore rejected the Administration's sweeping claim that non-citizens imprisoned in territories located outside of our Nation's borders necessarily have no constitutional rights.

The Court found separation of powers principles particularly important in the context of the Constitutional guarantee of habeas corpus, which the Court described as a "vital instrument" for securing our freedoms from unlawful restraint by our Government.[4] Justice Kennedy, for the majority, noted that the Framers considered that right of such central importance they made it one of the few guaranteed rights in a Constitution that initially had no Bill of Rights.

The Supreme Court rejected the Administration's formalistic argument that the reach of habeas is determined by notions of technical sovereignty. Recognizing that aliens held abroad would not necessarily be entitled to every single constitutional right enjoyed by those within the United States, the Court sketched out a pragmatic framework to determine when it is necessary to recognize a particular constitutional right outside sovereign U.S. territory. Drawing a distinction between *de jure* and *de facto* sovereignty, the Court set out a series of factors to determine how much constitutional protection aliens held abroad are entitled to when bringing a habeas corpus action. Courts are instructed to look to, among other factors, the obstacles inherent in resolving the prisoner's entitlement to the writ, the nature of the sites of apprehension and detention, and the adequacy of the process for determining the status of the prisoner as an unlawful or enemy combatant. Given the nature of United States control over Guantanamo and the fact that the prisoners there lack any forum to effectively challenge their confinement, the Court found that the Guantanamo prisoners had a constitutional right to challenge their confinement by filing and pursuing habeas corpus in federal court.

After recognizing a right to habeas for the men held in Guantanamo, the Court confronted the question of whether the alternative procedures that the Department of Defense had established in 2004 – the Combatant Status Review Tribunals and their limited, congressionally-restricted review under the DTA – were an adequate substitute for habeas. Since the lower courts had never decided this question, the Court could have remanded the case to the D.C. Circuit to make a determination as to the adequacy of the substitute review procedure. However, given the importance of this matter and the fact that our clients (and hundreds of others) had already spent nearly six and a half years in detention, the Supreme Court elected to address this question itself.

In contrast to previous congressional substitutes for habeas, which the Court considered to have been instituted to streamline habeas actions and make habeas proceedings more efficient, here the Court concluded that Congress' explicit objective was to circumscribe habeas review. The DTA and MCA barred the Court of Appeals from inquiring into the legality of the detentions, limited the review to whether the standards set up by the Secretary of Defense had been complied with, and effectively disallowed the prisoner from presenting exculpatory evidence. Given these infirmities, the Court found the risk of error in CSRT proceedings – proceedings which could effectively result in lifetime confinement for the prisoners – to be "too significant to ignore."

[4] *Boumediene*, 128 S. Ct. at 2244.

Although the Court did not delineate exactly what process would be required, it required at a minimum that prisoners have a meaningful opportunity to contest the legality of their confinement and that the habeas court have (1) the ability to correct errors, (2) the authority to assess the sufficiency of the evidence, (3) the authority to admit and consider relevant exculpatory evidence not introduced in the earlier proceeding, and (4) the power to order conditional release.

The Supreme Court remanded the case to the Court of Appeals with instructions to remand to the Federal District Court in Washington where prompt hearings should be held.

The Dissents

The Court's 5-4 decision produced two dissents, one penned by Chief Justice Roberts and the other by Justice Scalia. The two fundamental points of disagreement separating the majority and the dissents were the reach of the Constitution outside the U.S. and the degree of deference owed by the Supreme Court to the Executive and Legislative Branches.

Justice Scalia argued that aliens imprisoned outside of the United States enjoy no constitutional protection whatsoever. He was not troubled that the Administration chose to bring prisoners to Guantanamo for the precise purpose of avoiding judicial oversight, because he found this action entirely consistent with the role of the Executive in conducting national security actions abroad. Further, finding no historical precedent for granting habeas actions to aliens held outside of the United States, Justice Scalia argued that the Court should defer to Congress and the President, whom he considered more competent to act in such matters.

Chief Justice Roberts' dissents stemmed from similar concerns. Like Justice Scalia, Chief Justice Roberts viewed the majority decision as an attempt by the judicial branch to wrest control over the detention of aliens from the President and Congress. Also like Justice Scalia, Chief Justice Roberts did not believe that aliens imprisoned at Guantanamo enjoyed sufficient constitutional protection to warrant access to the federal courts. Even granting that they enjoyed some constitutional protection, Chief Justice Roberts concluded that the procedural safeguards instituted by the Government were "the most generous set of procedural protections ever afforded aliens detained by this country as enemy combatants."[5] Since he concluded that none of the petitioners had yet availed themselves of the review in the D.C. Circuit that the DTA provided for, he was unwilling to find the review procedure inadequate.

Two of Chief Justice Roberts' critiques rested on factual misunderstanding. First, it is not correct to assert that many prisoners had failed to seek DTA review in the D.C. Circuit. For example, every single one of our clients has filed petitions in the D.C. Circuit challenging their confinement, even while pressing their habeas appeal. Their DTA reviews had not proceeded, however, because the D.C. Circuit had not taken any action on them. Indeed, they continue to await action to this day.

Chief Justice Roberts also contended that Guantanamo prisoners enjoy more procedural protection than any combatants in United States history. He based this assertion in large part upon the stated understanding that, before the CSRT, our clients were given "personal

[5] *Boumediene*, 128 S. Ct. at 2279 (Roberts, C.J., dissenting).

representatives" – not lawyers, but military officers who were required to testify against the prisoners if asked. Chief Justice Roberts wrote that this "personal representative" was allowed to see some classified evidence and summarize it for the prisoner, unlike any other enemy combatant in history. But this statement was not correct. The personal representative, by regulation, is not an advocate for the prisoner. And while the *personal representative* is permitted to see some classified information, he or she is expressly forbidden by DOD requirements from revealing any classified information to the prisoner.

Chief Justice Roberts also asserted that the Court should not have decided that Guantanamo prisoners have a right to habeas without first deciding exactly what constitutional rights prisoners held abroad are entitled to. Since the scope of habeas protection is flexible and depends in this instance on the underlying constitutional interest, the Chief Justice contended that only by deciding what due process rights prisoners possessed could the Court determine what level of habeas protection was necessary to vindicate those rights.

This argument ignores the fact that habeas is not simply a positive right held by those whom the government imprisons. Habeas is, as the majority opinion makes clear, a fundamental restraint on governmental overreaching. That is, the degree of procedural protection owed a prisoner is determined not merely by the rights available to that prisoner, but also by the constitutional restraints placed on the government to protect against arbitrary indefinite imprisonment. This is why the test announced by the Court focuses on practical impediments to issuing the writ, such as the obstacles inherent in resolving the prisoner's entitlement to the writ, the nature of the sites of apprehension and detention, and the adequacy of the process for determining the status of the prisoner as an unlawful or enemy combatant, rather than focusing on the constitutional rights of the prisoner.

Finally, focusing again not on what was decided, but rather on what was left undecided, Chief Justice Roberts argued that the Court's failure to set out a procedure for habeas actions to proceed would impede, rather than facilitate resolution of these cases. Both Chief Justice Roberts and Justice Scalia argued that courts were particularly unfit to balance the national security interests required to determine the scope of habeas procedures for Guantanamo prisoners.

III. HABEAS PROCEEDINGS

The dissenters' arguments that the district courts are particularly unfit to determine the procedural boundaries of habeas review were immediately taken up by high-ranking Administration officials, who have argued that Congress should again step into the Guantanamo habeas picture and enact legislation for the third time.

Yet, as the six weeks since the *Boumediene* decision have shown, the dissenters' and the Administration's mistrust of the courts' capabilities is unwarranted. Immediately following the *Boumediene* decision, counsel for Guantanamo prisoners took up the habeas actions that had been dismissed or stayed in 2005. In just a few short weeks, the district judges in charge of these cases have taken concrete steps to put in place functional, just, and expedient procedures for moving them forward. In contrast to the uncertainty and delay that Chief Justice Roberts foretold, it seems clear that if not interrupted by future legislation, these cases will be resolved

promptly by experienced judges using time tested habeas procedures and without any undue intrusion or interference in our nation's security interests.

A number of habeas cases, including those of the six Bosnian men we represent, are pending before District Judge Richard J. Leon. Judge Leon has publicly stated that the 12 cases before him, which involve 35 prisoners, will be resolved by the end of 2008. Former Chief Justice Thomas Hogan has also moved swiftly to fast track the remainder of the habeas cases before him for resolution of pre trial issues.

To accommodate his ambitious schedule while still permitting sufficient time for all parties to develop and voice their positions, Judge Leon has stated that he will make some rulings from the bench instead of writing opinions "tied up with bows and ribbons." The schedule he has set dedicates the first two months to "identifying the problems and finding ways to solve the problems" inherent in a habeas proceeding. He has said that all his habeas cases will be placed on an "accelerated briefing and hearing schedule" so that they can be resolved promptly before year's end and the inevitable loss of government focus that accompanies a change of administrations.

Status reports were filed by lawyers on both sides on July 18. These reports included a statement of issues common to all cases to facilitate any possible consolidation of common issues. On July 23 and 24, meetings were held with attorneys from each side, during which Judge Leon and the attorneys began to work toward resolution of various procedural issues, including access to classified information.

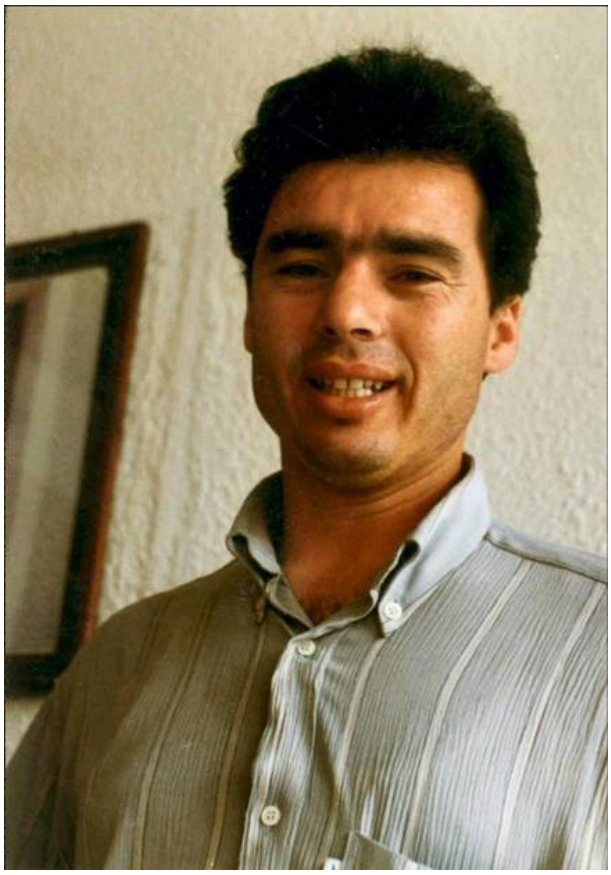
The remaining habeas cases are moving equally quickly before Judge Hogan, where the vast majority of other petitions have been consolidated to resolve all common issues. Within a week of the *Boumediene* decision, Judge Hogan held a conference with lawyers from the Department of Justice and counsel for the prisoners to develop a procedural structure for their habeas cases. Those parties are in the process of filing joint briefs to resolve many of the key issues that Administration officials have suggested are obstacles to prompt hearing and resolution of these habeas actions, including the scope of discovery, the standard for the admission of evidence, the standard governing hearsay, the application of the prisoners' rights to confront adverse witnesses and to compel witnesses to testify, the relevant standards of proof and the burdens of production.

Conclusion

Our clients and other Guantanamo prisoners' cases are now in front of Article III federal judges well qualified to assess and resolve the issues a habeas corpus challenge presents without compromising any national security interests. These issues should be resolved quickly and the cases will proceed to trial. After almost seven years of waiting, our clients will finally receive a meaningful determination of whether there are sufficient credible facts to justify their indefinite imprisonment. They will at long last have the opportunity to demonstrate that the Government's actions are groundless – a critical right that our Constitution wisely enshrines and protects. There is no sound reason for Congress to interfere in this process at this time and thereby delay habeas trials that are already far too long deferred and delayed.

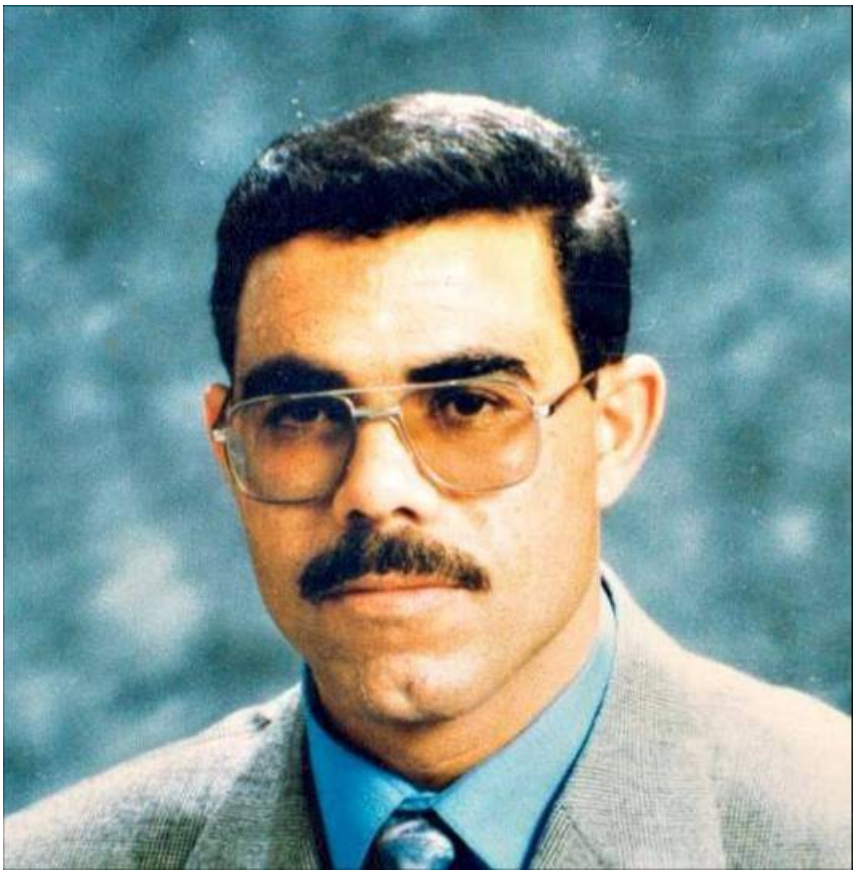
Appendix A: Photograph of Mustafa Ait Idir

Mustafa Aid Idir



Appendix B: Photograph of Belkacem Bensayah

Belkacem Bensayah

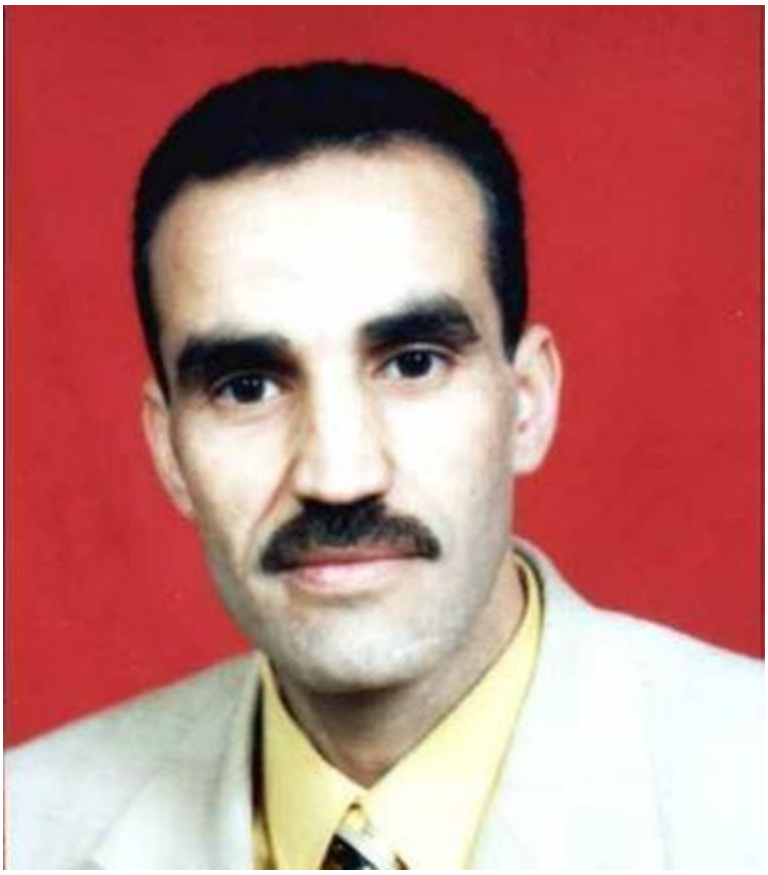


Appendix C: Photograph of Hadj Boudella

Hadj Boudella

Appendix D: Photograph of Lakhdar Boumediene

Lakhdar Boumediene



Appendix E: Photograph of Saber Lahmar

Saber Lahmar

Appendix F: Photograph of Mohamed Nechla

Mohamed Nechla