

# **EXHIBIT I**

## Draft of Potential Discovery Requests

Please disclose the following records:

1. All records related to the torture, abuse or mistreatment of detainees at or in transit to the Guantanamo Bay detention facility.
2. All records discussing or in any way related to the potential or actual application of the following methods or techniques on detainees at or *en route* to the Guantanamo Bay detention facilities: using “stress and duress” techniques; using force against them; subjecting them to physical injury; requiring them to stand or kneel for prolonged periods; subjecting them to sleep deprivation techniques for extended periods of time; shackling or otherwise holding them in fixed positions for prolonged periods; denying them painkillers or medical treatment; administering or threatening to administer mind altering substances, “truth serums” or procedures calculated to disrupt the senses or personality; subjecting them to prolonged exposure to or interrogation under bright lights or strobe lights; requiring them to be hooded, stripped, or blindfolded; binding their hands and feet for prolonged periods of time; isolating them for prolonged periods of time; denying them the use of bathroom facilities for extended periods of time or forcing them to remain in their own excrement or urine; subjecting them to violent shaking; subjecting them to intense noise; subjecting them to temperature extremes; threatening harm to them, members of their families, or other individuals.
3. All records constituting policies, procedures, or guidelines defining the appropriate or inappropriate use of the procedures identified in Paragraph 2 above.
4. All records indicating or discussing actual or possible violations of or deviations from any policies, procedures, or guidelines put in place to ensure that the detainees were not, are not, or will not be tortured, abused or mistreated.
5. For each case in which a petitioner detainee indicated during the course of a CSRT that he had been subjected to torture, abuse or mistreatment; i) all documents concerning both the initial referral of the matter to and the subsequent investigation or inquiry undertaken by, inter alia, the CSRT Assistant Legal Advisor, the OARDEC Liaison to the Criminal Investigation Task Force, or JTF-GTMO, without regard to whether that investigation or inquiry is complete; ii) the identity of all personnel involved in this investigation or inquiry; iii) a copy of any instructions, guidelines, or policies relied upon by the CSRT in making this referral or otherwise instructing or advising the CSRT how to evaluate or respond to a report of torture by a detainee; iv) any documentation tending to show that the result of the investigation or inquiry was or was not provided to, made known to, or relied upon by the CSRT.
6. All records relating to policies, procedures, or guidelines governing the role of health personnel in the interrogation of detainees at the Guantanamo Bay detention facility, including but not limited to the role of health personnel in the medical, psychiatric, or psychological assessment of detainees immediately before, during, or immediately after interrogation. Please include any records indicating communication or the transfer of records concerning petitioner detainees between health personnel and interrogators before, during or after an interrogation for the purpose of facilitating or guiding the interrogation process.
7. All records pertaining to recommendations given by any government agency regarding the continued detention of petitioner detainees at the Guantanamo Bay detention facility or their release and repatriation.