IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ABU BAKKER QASSIM and A'DEL ABDU AL-HAKIM,

Petitioners/Plaintiffs,

v.

George W. Bush, *et al.*,

Respondents/Defendants.

Civil Action No. 05 cv 0497 (JR)

MEMORANDUM IN SUPPORT OF PETITIONERS' EMERGENCY MOTION TO VACATE STAY ORDER AND ISSUE WRIT DIRECTING IMMEDIATE RELEASE OF PETITIONERS

Petitioners Abu Bakker Qassim and Adel Abdu Al-Hakim submit this memorandum of law in support of their Emergency Motion to Vacate Stay Order and Immediately Issue Writ Directing Release of Petitioners. Relief is urgently needed because the government continues to imprison Petitioners in a high-security jail despite having concluded, months ago, that there is no lawful basis to hold them.

I. PROCEDURAL BACKGROUND

The Habeas Corpus Petitions. Counsel for Mr. Qassim and Mr. Al-Hakim filed a Petition for Writs of Habeas Corpus on March 10, 2005.

The Government's Refusal to Respond. The government immediately moved to stay this case, contending that a pending appeal in other *habeas* cases would resolve common questions, and thus that judicial efficiency would be served by staying proceedings here until resolution of that appeal. *See* Respondents' Motion to Stay Proceedings Pending Related Appeals and for Continued Coordination (filed March 14, 2005) [Docket No. 2].[1] The government never responded to the Petition. It never

[1] The government argued that the issues on appeal in *In re Guantanamo Detainee Cases*, 355 F.Supp.2d 433 (D.D.C. 2005), *appeal docketed*, and *Khalid v. Bush*, 355 F.Supp.2d

disclosed any information regarding Petitioners, never produced records of its Combatant Status Review Tribunals ("CSRTs"), and never disclosed any allegation, charge, or basis on which Petitioners are (or ever were) held. On information and belief, the government knew, but withheld from this Court during the stay proceedings, that it had already determined (through the CSRT process) that the Petitioners are not so-called "enemy combatants." *See* Declaration of Sabin Willett ("Willett Decl.") (filed herewith) ¶¶ 11-12.

The Government's Efforts to Conceal the Facts. At the time the petition was filed, counsel was unable to meet or communicate with Petitioners. Press reports suggested that they might be among a group of uniquely-situated Guantanamo prisoners seized by mistake and not regarded to be enemy combatants even by the government. According to a March 16, 2005 press report, "The Pentagon determined last year that half of the two dozen Uighur Chinese captured in the war on terrorism have no intelligence value and should be released. The US has so far resisted Beijing's demands for repatriation out of concern that they may be tortured once back in China." "Uighurs face return from Guantanamo," *Financial Times* (March 16, 2005).[2] *See also infra* § IV.

Accordingly, in March, 2005, counsel twice asked the government whether it contended that the Petitioners were enemy combatants or in any way a threat to the security of the United States. *See* April 5, 2005 Declaration of Susan Baker Manning re Reply in Support of Motion for Rule 16 Conference and for Other Procedural Relief, Exs. G & H [Docket No. 12]. The government ignored these inquiries. *Id.* at ¶ 9.

Strategic silence has not, however, been the government's only tactic. The government has repeatedly implied that Petitioners had been deemed to be "enemy

311 (D.D.C. 2005), *appeal docketed*, would address the "core issues" in this case. Motion to Stay at 7. The D.C. Circuit recently scheduled oral argument in those cases for the fall of 2005. There is no need to wait for that decision, however, because the government's representation to this Court was misleading at best. The core issue here—that Petitioners already have been exonerated by the government—is not at issue in either appeal.

[2] Previously submitted as Exhibit F to Second Declaration of Susan Baker Manning In Support of Application for Preliminary Injunction [Docket No. 6].

combatants," when in fact they had not. To take just one example, a March 29, 2005 filing, the government noted that "[a] factual record for a petitioner in a Guantanamo Bay detained case typically has consisted of the record of proceedings before the Combat Status Review Tribunal that *confirmed petitioner's status as an enemy combatant properly subject to detention.*" Respondents' Opposition to Request for Rule 16 Conference at 3 n.2 (emphasis added) [Docket No. 11]. That is highly misleading, given what the government apparently already knew—that CSRT had exonerated these men, not "confirmed" their status as enemy combatants.

Because the government refused to respond to the Petition, and successfully argued that it should not be required to provide a factual return, Petitioners' Counsel were unable to identify and point out the government's misleading statements to the Court. The usual delays attended efforts by counsel to meet with their clients. Counsel were first subject to an FBI background check, were not permitted to telephone the Petitioners, and were not permitted to travel to meet them until July 13, 2005 (Mr. Qassim) and July 14, 2005 (Mr. Al-Hakim). Willett Decl. ¶ 3. Only then did Counsel learn that the government had already resolved the critical factual issue—whether Petitioners are "enemy combatants"—in Petitioners' favor.

The Stay and the Pending Legal Dispute. The government's strategic silence has cost these Petitioners many months in prison. It strongly appears that the government knew that it had found these Petitioners not to be enemy combatants at the same time that it vigorously—and successfully—litigated in this Court to avoid disclosing that fact. The result was that the illegal imprisonment of the Petitioners has been prolonged for many months.

In May 2005, unaware that the Petitioners had been found not to be enemy combatants, this Court granted the government's motion for stay. The stay related to a legal dispute that is relevant only where the government alleges a prisoner is an "enemy combatant." As the Court well knows, many Guantanamo prisoners have contended that

the CSRT process was illegal and noncompliant with the Supreme Court's decision in *Rasul v. Bush*, 124 S. Ct. 2686 (2004). The government has repeatedly argued that the CSRT is the appropriate process for determining whether a prisoner is or is not an "enemy combatant." *See, e.g., In re Guantanamo Detainee Cases*, 355 F.Supp.2d 433, 467 (D.D.C. 2005), *appeal docketed*, ("[R]espondents contend in their motion to dismiss that were this Court to conclude that the detainees are entitled to due process under the Fifth Amendment, the CSRT proceedings would fully comply with all constitutional requirements."). In January, two courts of this district reached contradictory conclusions on the question, and the dispute became the subject of consolidated appeals (as well as, later, a mandamus petition filed by these Petitioners). *See In re Guantanamo Detainee Cases*, 355 F.Supp.2d 433 (D.D.C. 2005), *appeal docketed*; *Khalid v. Bush*, 355 F.Supp.2d 311 (D.D.C. 2005), *appeal docketed*. The consolidated appeals and mandamus petition are now pending in the Court of Appeals.

All of those disputes are now revealed to be academic in this case, which now presents a circumstance counsel believe has never been addressed by any Court considering a Guantanamo *habeas* petition. Here, *the government itself, through its CSRT process has acknowledged that there is no lawful basis to imprison the Petitioners*. Accordingly, the factual and legal premises upon which the Court's stay order was founded are moot. The Petitioners, who have suffered more than three and one-half years of imprisonment, and who have been exonerated by the government of any wrongdoing, must immediately be released.

II. STATEMENT OF FACTS

1. Mr. Qassim is 36 years old. He is a "Turkistani," and a native of "East Turkistan," the region of western China also known as Xinjiang Uighur Autonomous Region and ruled with an iron fist by Communist China. He is married and has three children, including a pair of twins. He has never seen the twins nor heard their voices. Willett Decl. ¶ 4.

2. Mr. Al-Hakim is 31 years old. He is also a Turkistani, and native of the East Turkistan region. He is married and has three children. He has never met his third child. *Id.* ¶ 5.

3. Qassim and Al-Hakim are Uighurs, Muslims whose homeland is under control of Communist China. The Uighurs have suffered widespread intimidation, oppression, and torture at the hands of Chinese authorities.[3] Both Qassim and Al-Hakim fled persecution in China to Kyrgyzstan, where they met. They traveled thence to Iran. Willett Decl. ¶ 6.

4. The Petitioners were seized in Pakistan by Pakistani security forces in late 2001 or early 2002. In prison, Mr. Al-Hakim was advised that the Americans had paid a bounty of $5,000 apiece. Willett Decl. ¶ 7. *See also* "Guantanamo detainees say Arabs, Muslims sold for U.S. bounties," USA Today (May 31, 2005) (reporting that certain Guantanamo Bay detainees testified to CSRT that they had been sold to American forces for bounties ranging from $3,000 to $25,000).

5. Neither Mr. Qassim nor Mr. Al-Hakim has ever harbored any animosity toward America, and remarkably, each professes to feel support for America, even after three and a half years of detention. Each, however, is deeply opposed to the Chinese government, and believes that he will be imprisoned or tortured if sent back to China. *Id.* ¶ 8.

6. Indeed, while in custody at Guantanamo, each of the Petitioners was interrogated by Chinese representatives. During each of these sessions, Petitioners refused to speak, and were threatened. Willett Decl. ¶ 9.

7. The Petitioners were delivered into U.S. custody by the Pakistanis in late 2001 or early 2002, and then held in Kandahar, Afghanistan for approximately six months.

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[3] *See infra* § IV. *See also* Petitioners' Reply in Support of Request for Rule 16 Conference and Other Procedural Relief at 1-4, and Exhibits B-F & I-M to the Declaration of Susan Baker Manning in support thereof [Docket 12].

The United States transferred Petitioners to Guantanamo Bay, Cuba in approximately June, 2002, and has imprisoned them there ever since. Willett Decl. ¶ 10.

8. Sometime in late 2004 or early 2005, Messrs. Qassim and Al-Hakim each participated in a separate Combatant Status Review Tribunal. Willett Decl. ¶ 11

9. Earlier this year, at least two months ago, each Petitioner received a written statement with the results of the CSRT. Each petitioner, using an Arabic word, described the conclusion as that he had been found, "innocent." Willett Decl. ¶ 12.

10. Each Petitioner received a letter from undersigned counsel. Each petitioner responded by writing a letter advising counsel of the CSRT result. *Id.* ¶ 13

11. Undersigned counsel never received any letter from either Petitioner, Willett Decl. ¶ 14, and did not learn of the CSRT results until July 13 and 14, 2005, when counsel first met the clients.

12. On July 14, 2005, counsel spoke to a JAG officer at Guanatanamo Bay, who confirmed that each of the Petitioners had received a CSRT finding that he was "no longer an enemy combatant." Willett Decl. ¶ 15.

13. There are substantial housing and work opportunities at Guantanamo Bay, Cuba outside the detention facilities and away from secure and other sensitive military facilities. Willett Decl. ¶ 14-18.

III. PETITIONERS SHOULD, AND MUST, BE RELEASED.

A. There Is No Legal Basis for Imprisoning Mr. Qassim or Mr. Al Hakim.

"The central purpose of any system of criminal justice is to convict the guilty *and free the innocent.*" *Herrera v. Collins*, 506 U.S. 390, 398 (1993) (emphasis added). Here, the government continues to imprison—apparently for reasons of its own convenience—men it has already found to be blameless. It has no authority to do so.

The government contends that it derives its authority to imprison "enemy combatants" at Guantanamo Bay, Cuba from the Authorization for Use of Military Force passed by Congress in the wake of the September 11 attacks. Pursuant to that joint

resolution, Congress authorized the President to use "all necessary and appropriate force against those nations, organizations, or persons he determines planned, authorized, committed, or aided the terrorist attacks [of September 11, 2001] . . . or harbored such organizations or persons." Authorization for Use of Military Force, Pub.L. 107-40, §§ 1-2, 115 Stat. 224. Acting pursuant to that authorization, the President sent U.S. Armed Forces into Afghanistan to wage a military campaign against al Qaeda and the Taliban regime that had supported it. In a November 13, 2001 executive order, the President also purported to authorize the Secretary of Defense to detain persons the executive has "reason to believe" are members of al Qaeda, terrorists, or those who "knowingly harbored" such individuals. As is well known, the Secretary of Defense detained hundreds of men at Guantanamo Bay, Cuba without charge or hearing as so-called "enemy combatants."

Over two and a half years later, and nine days after the Supreme Court issued its *Rasul* and *Hamdi* decisions, the executive branch issued regulations finally defining an "enemy combatant" and establishing the CSRT process.[4] It defined an "enemy combatant" as "an individual who was part of or supporting the Taliban or al Qaeda forces, or associated forces that are engaged in hostilities against the United States or its coalition partners. This includes any person who has committed a belligerent act or has directly supported hostilities in aid of enemy armed forces." Order Establishing Combat Status Review Tribunal issued by Deputy Secretary of Defense Paul Wolfowitz (July 7, 2004) ("Wolfowitz Order") at ¶ *d.*[5] *See also Khalid v. Bush,* 355 F.Supp.2d 311 at n.2 (D.D.C. 2005) (Leon, J.) (noting that this definition "applies to foreign nationals held at Guantanamo"), *appeal docketed.*

Deputy Secretary Wolfowitz's order specifically provides: "Following the hearing

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[4] The Supreme Court noted in *Hamdi* that up to that time the government "ha[d] never provided any court with the full criteria it uses in classifying individuals" as "enemy combatants." *Hamdi v. Rusmsfeld*, 124 S. Ct. 2633, 2639 (2004).

[5] Available at www.defenselink.mil/news/Jul2004/d20040707review.pdf.

of testimony and the review of documents and other evidence, the Tribunal shall determine in closed session by majority vote *whether the detainee is properly detained as an enemy combatant.*" Wolfowitz Order at ¶ g(12) (emphasis added). *See also* Memorandum issued by Secretary of the Navy Gordon England implementing CSRT procedures (July 29, 2005) at 1 (noting that the CSRT was established to determine whether detainees at Guantanamo "are properly classified as enemy combatants *and to permit each detainee to opportunity to contest such designation*") (emphasis added).[6]

Deputy Secretary Wolfowitz's order further provides:

> *Non-Enemy Combatant Determination.* If the Tribunal determines that the detainee shall no longer be classified as an enemy combatant, the written report of its decision shall be forwarded directly to the Secretary of Defense or his designee. The Secretary or his designee shall so advise the Secretary of State, in order to permit the Secretary of State to coordinate the transfer of the detainee for release to the detainee's country of citizenship or other disposition consistent with domestic and international obligations and the foreign policy of the United States."

Wolfowitz Order at ¶ *i.*

We have elsewhere asserted that the CSRT process is unlawful, but that question is now moot. If Congress and the President only authorized the detention of "enemy combatants," then even assuming for the sake of argument that the executive has extrajudicial power to define enemy combatants and adjudicate their status, it must follow that when the executive branch determines a person *not* to be an enemy combatant, no extrajudicial basis remains to justify imprisonment.[7]

It is undisputed that the CSRT has determined that Mr. Qassim and Mr. Al-Hakim

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[6] Available at www.defenselink.mil/news/Jul2004/d20040730comb.pdf.

[7] *Cf. Rasul*, 124 S. Ct. at 2698 n.15 ("Petitioners' allegations—that, although they have engaged neither in combat nor in acts of terrorism against the United States, they have been held in Executive detention for more than two years in territory subject to the long-term, exclusive jurisdiction and control of the United States, without access to counsel and without being charged with any wrongdoing—unquestionably describe 'custody in violation of the Constitution or laws or treaties of the United States.'"); *Hamdi v. Rumsfeld*, 124 S. Ct. 2633, 2648 (2004) ("[A] citizen-detainee seeking to challenge his classification as an enemy combatant must receive notice of the factual basis for his classification, and a fair opportunity to rebut the Government's factual assertions before a neutral decisionmaker.").

are not properly detained as "enemy combatants." Having contended that the tribunal process was adequate to determine whether a prisoner was or was not an "enemy combatant," the government can hardly ignore the result of its own process—particularly a process that it controlled minutely, even to the level of depriving the prisoner of counsel and an opportunity to confront the evidence against him.[8] As to the government, the CSRT's determination is final and binding. *See* Navy Sec. England Memo. at Enclosure 1 § I(8). Mr. Qassim and Mr. Al-Hakim must therefore be released.

B. Equitable Considerations and the Public Interest

These Petitioners have been in prison, without charge, for more than three and one half years. Apparently, there has never been a basis to hold them. When he was still in Kandahar, Mr. Al-Hakim was advised by an interrogator that the government knew that that his capture was a mistake. Willett Decl. ¶ 10. The CSRT has confirmed that there is no basis to detain Petitioners. *Id.* ¶¶ 12 & 15. Mr. Al-Hakim has a child he has never seen, and Mr. Qassim has two. *Id.* ¶¶ 4 & 5. Each has a wife who does not know where is his, or if he is alive. Each has family members to whom he has not spoken for years. The hardships of life at Guantanamo itself are too well known to require repetition.

"[T]he public has a strong interest in ensuring that its laws do not subject individuals to indefinite detention without due process; '[i]t is always in the public interest to prevent the violation of a party's constitutional rights.'" *Abdah v. Bush*, 2005 WL

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[8] The government has indicated in filings with this Court that—contrary to what it has actually done in this case—a prisoner who is exonerated by the CSRT will be released. *See, e.g.*, Respondents' Memorandum in Opposition to Petitioners' Motions for Temporary Restraining Orders and Preliminary Injunctions at 11 ("DoD has no interest in detaining enemy combatants longer than necessary."); *id.* at 12-13 ("The underlying purpose of detention of enemy combatants at Guantanamo is to remove them from the fight and negate the danger they would otherwise pose to the United States and its allies. . . . If the Executive determines, for whatever reason, that the Nation's security no longer require it to detain a particular individual, then the obvious and natural thing to do is to end the detention."); Declaration of Pierre-Richard Prosper (Exhibit C to Respondents' Memorandum in Opposition to Petitioners' Motions for Temporary Restraining Orders and Preliminary Injunctions) at ¶ 3 ("Detainees have been transferred for release when it is determined that they no longer meet the criteria of enemy combatants or no longer pose a continuing threat to the United States.").

711814 (D.D.C. 2005) (Kennedy, J., quoting *G & V Lounge, Inc. v. Mich. Liquor Control Comm'n*, 23 F.3d 1071, 1079 (6th Cir.1994)). The public also has a strong interest in confidence that its public institutions reflect a rule of law, rather than the unchecked power of the executive. At some point the Courts simply must call a halt.

Petitioners' ongoing confinement appears to be a public-relations exercise designed to minimize embarrassment to the government by keeping the mistaken incarceration out of public view. Government embarrassment hardly justifies a man's imprisonment. If it was gulled by Pakistani bounty hunters, and then held these men in appalling conditions in Kandahar and Guantanamo Bay for three and one half years, then the government must shoulder responsibility for its mistakes.

IV. Practical Issues Related to Release, and the Government's Obligation Not to Return Petitioners to China Where They Will Likely be Tortured or Killed.

Petitioners expect the government to contend that it has continued to imprison Petitioners because it has been unable to find a suitable country that will accept them. Petitioners are Uighurs, an oppressed ethnic and religious minority in western China. They cannot be returned to their home, because they would likely be imprisoned, tortured or killed by the Communist Chinese government. But being a refugee is not a crime justifying indefinite detention.

According to the State Department, in China during 2004 "[f]ormer detainees reported credibly that officials used electric shocks, prolonged periods of solitary confinement, incommunicado detention, beatings, shackles, and other forms of abuse. . . . Deaths in custody due to police use of torture to coerce confessions from criminal suspects continued to occur." U.S. Dep't Of State, Country Reports On Human Rights Practices – 2004 (China Report), § 1(c) (2005), available at www.state.gov/g/drl/rls/hrrpt/2004/41640.htm.

The State Department reports particularly harsh abuse of the ethnic Uighur Muslims:

> The Government used the international war on terror as a justification for cracking down harshly on suspected Uighur separatists expressing peaceful political dissent and on independent Muslim religious leaders. . . . Uighurs were executed and sentenced to long prison terms during the year on charges of separatism. . . . In October 2003, Uighur Shaheer Ali was executed after being convicted of terrorism. He had been repatriated forcibly from Nepal in 2002, where he had been interviewed by the UNHCR and granted refugee status.

Id. at Introduction and § 5, subsection on National/Racial/Ethnic Minorities. *See also* J. Kurlantzik, "Unnecessary Evil: China's Muslims aren't terrorists. So why did the Bush administration give Beijing the green light to oppress them?" *Washington Monthly* (Dec. 1, 2002) ("More than 3,000 Uighurs reportedly have been secretly jailed since 9/11, and many have been executed for no given reason. Xinjiang province . . . remains the only place in China where people are routinely put to death for purely political disagreement.").

The Chinese government has called on Washington to return Uighurs captured in Afghanistan to China "to face charges of terrorism." Manning Decl., Ex. J [Docket 12]. Mr. Qassim and Mr. Al-Hakim have each been interrogated and specifically threatened by Chinese officials while imprisoned at Guantanamo. Willet Decl. ¶ 9. There is every reason to believe that to return them to China would be a death sentence.

Press reports indicate that the U.S. government has vacillated on whether it would return the Uighurs in Guantanamo to China. On August 12, 2004, Secretary of State Colin Powell said that the ethnic Uighurs at Guantanamo would not be returned to China. "The Uighurs are a difficult problem," Powell said in a briefing, "and we are trying to resolve all issues with respect to all detainees at Guantanamo. The Uighurs are not going back to China." Manning Decl., Ex. L [Docket 12].

Recent press reports indicate, however, that the Government has been unsuccessful in finding a third country willing to take the Uighurs from Guantanamo. *Id.*, Ex. E. Press reports have quoted a "senior administration official" as indicating "[t]he US may have to consider sending Muslim Chinese prisoners at Guantanamo Bay to China, following failed

efforts to persuade European countries to accept them as refugees." "Uighurs face return from Guantanamo," *Financial Times* (March 16, 2005).

The government's long confinement of the Petitioners at Guantanamo Bay may have so stigmatized them in the eyes of the world that it is difficult to find a home for them elsewhere, or the government may not regard Petitioners' plight as a priority, or both.

One thing is certain: just because there is not yet a country to which the Petitioners may be sent does not mean that the only option is to incarcerate them indefinitely in a maximum-security prison.[9] They are neither criminals, nor war criminals, nor "enemy combatants" (whatever the latter phrase means), nor illegal aliens. They were brought to Cuba by the United States government against their will. There is vastly more to the Guantanamo Bay Naval Station than a prison,[10] and even if Petitioners' stay at Guantanamo must be prolonged for some period of time, there is no reason to prolong their *imprisonment* there.

Having brought the Petitioners to Guantanamo Bay against their will, the United States can find a place to house them that is not a maximum security prison. Petitioners therefore request that the Court promptly convene a hearing to address practical considerations concerning the release of the Petitioners.

V. CONCLUSION

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[9] Although the executive branch's current detention without charge of hundreds of men by at Guantanamo is unprecedented—and, as we have contended elsewhere, wholly illegal—this case is not the first time the government has faced the quandary of what to do with individuals who cannot be sent back to their own country. The Supreme Court has ruled, in no uncertain terms, that it may not simply jail them indefinitely. "Based on our conclusion that indefinite detention of aliens [admitted to the United States and subsequently ordered removed] would raise serious constitutional concerns, we construe the statute [authorizing post-removal detention] to contain an implicit 'reasonable time' limitation, the application of which is subject to federal-court review." *Zadvydas v. Davis*, 533 U.S. 678, 682 (2001). *See also Clark v. Martinez*, 125 S. Ct. 716 (2005) (affirming *Zadvydas* and extending the rule against indefinite detention to aliens held by the government but not yet admitted to the United States).

[10] Guantanamo Bay is a large station, many parts of which are of normal security. Many contractors and other civilians work and live there. Willet Decl. ¶¶ 16-18. Adequate food and housing are available today, for modest cost, on the Leeward Side, separated by a Navy ferry from the side of the bay where the secure facilities are located. *Id.*

Mr. Qassim and Mr. Al-Hakim have not committed any crime. Indeed, it is not clear that they were ever accused of wrongdoing—and in any case, the government has exonerated them. That same government should release them from prison at once.

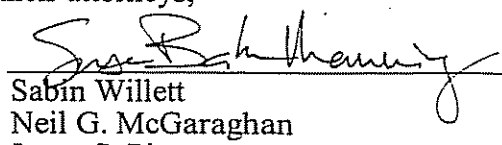
Mr. Qassim and Mr. Al-Hakim therefore respectfully request that the Motion be allowed, that writs of habeas corpus issue, that the court issue and order prohibiting their transfer or rendition to any other country pending further hearing, and that the Court promptly hold a hearing to consider what other relief may be just and proper in these unique circumstances.

Dated: July 20, 2005

Respectfully Submitted,

Abu Bakker Qassim and A'del Abdu Al-Hakim,

By their attorneys,



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