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c/o Office of the High Commissioner for Human Rights
United Nations Office at Geneva
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(Sent via e-mail: urgent-action@ohchr.org; srct@ohchr.org)

19 February, 2016

Dear Special Rapporteurs,

**Re: Urgent action in respect of medical situation of Mr. Mustafa al-Hawsawi, detained
in Guantánamo Bay**

REDRESS¹ is writing to you to request Urgent Action regarding the medical situation of Mr. Mustafa al-Hawsawi, a citizen of Saudi Arabia who was subjected to treatment amounting to torture and detained in the CIA's Rendition, Detention and Interrogation (RDI) Programme from 2003 until 2006. Since 2006 Mr. al-Hawsawi has been detained in Guantánamo Bay without access to adequate medical care. REDRESS represents Mr. al-Hawsawi in relation to his claims outside the United States of America.

Mr. al-Hawsawi is suffering from a number of serious medical conditions, including injuries sustained as a result of the treatment inflicted on him by the United States (U.S.) Government. These include, Hepatitis C, cervical degenerative disk disease, chronic haemorrhoids, anal fissures and rectal prolapse. Mr. al-Hawsawi's military legal team, who represent him in proceedings in relation to the United States of America, including in pre-trial proceedings in Guantánamo Bay, have informed REDRESS that his medical condition is deteriorating; he is in extreme physical pain, which has increased in severity in recent weeks,

¹ The Redress Trust (REDRESS) is an international human rights organisation based in London with the mandate to support victims of torture and other international crimes in their quest for justice and reparations. See: www.redress.org.

and is experiencing symptoms, including blood in his urine, the causes of which have not been identified or treated. There is a real risk that Mr. al-Hawsawi's health, and ultimately his life, are threatened if there is no immediate improvement in his access to adequate medical care.

In July 2015 the Inter-American Commission on Human Rights issued a resolution adopting precautionary measures in relation to Mr. al-Hawsawi in light of concerns regarding his conditions of confinement and access to healthcare.² However, despite the passage of more than six months since the adoption of this resolution Mr. al-Hawsawi's military legal team, who regularly visit him in Guantánamo Bay, have not seen any improvement in his conditions of confinement or medical care, but rather, a rapid deterioration of his medical state in recent months.

We note that in addition to issues regarding access to medical care, a range of ongoing violations, including lack of accountability for torture, a failure to conduct prompt and effective investigations, and the threat of facing a death sentence following an unfair trial, fall within your respective mandates, however, in light of the urgency of concerns regarding access to medical care this submission focuses on that issue alone.

We respectfully request that your offices urgently inquire into this matter and that you request the U.S. Government to ensure that Mr. al-Hawsawi is provided promptly with the necessary medical care. Specifically the following measures are needed:

- An independent medical examination;
- Surgery to remedy the rectal prolapse Mr. al-Hawsawi has suffered from since his secret detention in the CIA RDI Programme;
- Tests to determine the underlying condition causing blood in Mr. al-Hawsawi's urine;
- Effective treatment for Hepatitis C and follow up; and
- Access to Mr. al-Hawsawi's medical records for Mr. al-Hawsawi and his military legal team.

We are ready to provide you with further information or to clarify any issues in relation to this matter.

Sincerely,

Carla Ferstman
Director

CC: Dr. Emilio Álvarez Icaza, Executive Secretary, Inter-American Commission on Human Rights

Ms. Elizabeth Abi-Mershed, Assistant Executive Secretary, Inter-American Commission on Human Rights

² Inter-American Commission on Human Rights, Resolution 24/2015, Precautionary Measure No. 422-14, Matter of Mustafa Adam Al-Hawsawi regarding the United States of America, 7 July 2015, at <http://www.redress.org/downloads/resolution-24-2015---precautionary-measures-al-hawsawi.pdf>.

I. Identity of the Victim

- a. Family name:** al-Hawsawi
- b. First and other names:** Mustafa Ahmad
- c. Sex:** Male
- d. Birth date:** 5 August 1968
- e. Nationality:** Saudi Arabia
- f. Residential and/or work address:** Arbitrarily detained at Camp 7, Guantánamo Bay, Cuba

II. Current medical situation

1. Mr. al-Hawsawi was detained in the CIA's Rendition, Detention and Interrogation (RDI) Programme from 2003, when he was captured in Pakistan, until 2006, when the U.S. Government finally acknowledged his detention. Since 2006 Mr. al-Hawsawi has been detained at a severely restricted-access facility at Guantánamo Bay, remaining in the custody of the U.S. Government. As detailed further below, during his secret detention prior to his arrival at Guantánamo Bay, Mr. al-Hawsawi was subjected to torture and cruel, inhuman and degrading treatment, including so-called enhanced interrogation techniques, water dousing and sexual violence in the form of rectal exams conducted with excessive force. Mr. al-Hawsawi's military legal team report that Mr al-Hawsawi sustained a number of serious injuries as a result of the treatment outlined further below (Section VI) and also developed a range of acute medical conditions exacerbated by his continued arbitrary detention.

Chronic haemorrhoids, anal fissure and rectal prolapse

2. The Executive Summary of the Senate Select Committee on Intelligence's Study of the Central Intelligence Agency's Detention and Interrogation Program (SSCI Summary) notes that following the incident of sexual violence perpetrated against him, Mr. al Hawsawi was "diagnosed with chronic haemorrhoids, an anal fissure, and symptomatic rectal prolapse."³ As the U.S. Government has not taken action to remedy these conditions, Mr. al-Hawsawi continues to suffer from them today.⁴

Undiagnosed condition causing blood in urine

3. In July 2014, Mr. al-Hawsawi experienced an acute onset of pain associated with urination and the visible presence of blood in his urine.⁵ The most recent urine samples, taken a year later in May 2015 and August 2015, showed that blood remained present in Mr. al-Hawsawi's urine.⁶ In January 2016, Mr. al-Hawsawi saw a large discharge of blood in his urine stream – equivalent to the first onset in July 2014. Mr. al-Hawsawi has indicated to his military team that the continuous pain associated with urinating blood is increasing in intensity.⁷ The British Association of

³ US Senate Select Committee on Intelligence, Committee Study of the Central Intelligence Agency's Detention and Interrogation Program, Executive Summary, December 3, 2014 (SSCI Summary), p. 100, fn. 584.

⁴ Appendix 1, Request for an Individual Complaint Hearing During the 157th Period of Sessions on the Petition of Mr. Mustafa al-Hawsawi (No. 1385-14) and, particularly, the United States Government's Non-Performance of the Inter-American Commission on Human Rights' ("IACmHR") Precautionary Measures (MC-422-14) Deeming Mr. al-Hawsawi's Situation "Serious," "Urgent," and Indicative of "Irreparable Harm.," 20 January 2016 (Request for Individual Complaint Hearing).

⁵ Appendix 2, Military Commissions Trial Judiciary: Guantanamo Bay, *USA v Khalid Shaykh Mohammad et. al.*, AE 332 (MAH), Defense Emergency Motion for Appropriate Medical Intervention and Return of Legal Files, 15 December 2014, (Defense Emergency Motion) p. 3.

⁶ Request for Individual Complaint Hearing, above n. 4.

⁷ *Ibid.*

Urological Surgeons notes that 1 in 5 adults with visible blood in the urine are subsequently discovered to have bladder cancer.⁸

Hepatitis C

4. In 2006, when Mr. al-Hawsawi was transferred to Guantánamo Bay from the CIA's network of secret prisons, he tested positive for Hepatitis C.⁹ It appears that Mr. al-Hawsawi became infected with Hepatitis C during his enforced disappearance in the CIA RDI Programme as he did not have this condition before his detention.¹⁰
5. The World Health Organisation factsheet regarding Hepatitis C notes that "A significant number of those who are chronically infected will develop liver cirrhosis or liver cancer."¹¹

Medical conditions causing severe pain

6. In addition to the conditions outlined, Mr. al-Hawsawi suffers from:
 - cervical degenerative disk disease, which causes severe back and neck pain;
 - chronic and debilitating headaches and migraines;
 - multiple hyper densities in the kidney, kidney stones, cirrhotic change in his liver and multiple focal calcifications in and surrounding the midline urethra;
 - chronic tinnitus or ringing in his ears which causes him severe pain.¹²

III. Access to medical care

7. Throughout his detention in Guantánamo Bay, U.S. authorities have failed to provide Mr. al-Hawsawi with adequate medical care and assistance has been limited to palliative handling of his symptoms. The underlying causes have consistently been ignored and as a result, his health is rapidly deteriorating.¹³
8. Mr. al-Hawsawi's legal team state that a surgical consultation, which was requested six months ago for possible repair of his torn rectum, has not yet occurred.¹⁴ As a result, when defecating or straining, Mr. al-Hawsawi must manually re-insert the prolapsing tissue back into his rectal cavity with his fingers, in spite of excruciating pain.¹⁵ In order to avoid this painful procedure Mr. al-Hawsawi is minimizing his eating, which has resulted in a serious reduction in his body weight, which is further compromising his health.¹⁶
9. The U.S. Government is not communicating with Mr. al-Hawsawi or his lawyers about the condition causing blood in his urine. Despite the worrying symptoms and

⁸ British Association of Urological Surgeons, at http://www.baus.org.uk/patients/conditions/2/blood_in_the_urine_haematuria.

⁹ Defense Emergency Motion, above n. 5, p. 3.

¹⁰ Request for Individual Complaint Hearing, above n. 4.

¹¹ World Health Organisation, at <http://www.who.int/mediacentre/factsheets/fs164/en/>.

¹² Defense Emergency Motion, above n. 5, pp.3-4. See also, Appendix 3, Submission to Inter-American Commission on Human Rights, Mustafa Adam al-Hawsawi, Request for Information no. MC-422-14, United State, 5 June 2015 (Submission to IACHR, June 2015); Appendix 4, Amnesty International USA, *Letter to Assistant Secretary Woodson re: Medical Treatment of Mustafa al-Hawsawi*, Detainee at Guantánamo, February 3, 2016 (Amnesty International Letter re Medical Treatment).

¹³ Request for Individual Complaint Hearing, above n. 4, p. 2.

¹⁴ Amnesty International Letter re Medical Treatment, above n. 12, p. 4.

¹⁵ Request for Individual Complaint Hearing, above n. 4.

¹⁶ Mr. al-Hawsawi is 5' 4 ½" (1m 64cm) tall and weighs around 100lbs (approx. 45.3 kg).

the pain Mr. al-Hawsawi experiences when urinating, the condition causing them has still not been identified.¹⁷

10. In addition to their failure to provide Mr al-Hawsawi with required adequate medical care, the authorities continue to ignore his and his lawyers' requests for full access to his medical records. When limited medical records are made available to Mr. al-Hawsawi, they are seriously outdated as they are provided only six months after they are generated.¹⁸ His lawyers report that since the release of the SSCI Summary in December 2014 Mr. al-Hawsawi has been denied access to the results of medical tests performed on him.¹⁹
11. In addition, Mr. al-Hawsawi's lawyers have expressed concerns that it is not possible for him to develop a trusting doctor-patient relationship with military physicians who are stationed at Guantánamo Bay as these physicians rotate frequently, approximately every six months.²⁰ Additionally, due to the strict classification regime, it is not clear whether the physicians treating him have access to full information regarding Mr. al-Hawsawi's conditions and/ or their causes.²¹
12. His military legal team have stressed the need for access to information regarding Mr. al-Hawsawi's medical care in light of the ill-treatment which he has been subjected to by the U.S. Government. Bearing in mind that these authorities continue to be responsible for Mr. al-Hawsawi's detention and medical care, the legal team have noted that "It is important to understand that legal counsel stand in the position of closest trusting relationship available to Mr. al-Hawsawi at this time."²²

IV. Remedial action undertaken to obtain adequate medical care

13. The U.S. Government continues to arbitrarily detain Mr. al-Hawsawi and is obliged to ensure that he receives comprehensive medical care.²³ Mr. al Hawsawi's legal team has requested the required medical care through relevant submissions to the Military Commissions at Guantánamo Bay.²⁴ However, this effort was unsuccessful as the Military Commission Judge presiding over Mr. al-Hawsawi's case ruled that "...this Commission does not have the authority to address issues concerning medical care."²⁵
14. In July 2015 the Inter-American Commission on Human Rights issued precautionary measures in relation to Mr. al-Hawsawi requesting that the U.S.:
 - i. Adopt the necessary measures to protect the life and personal integrity of Mr. al-Hawsawi;
 - ii. Adopt the necessary measures to guarantee that the detention conditions are adequate in accordance with applicable international standards;

¹⁷ Request for Individual Complaint Hearing, above n. 4.

¹⁸ Request for Individual Complaint Hearing, above n. 4; Submission to IACHR, June 2015, above n. 12.

¹⁹ Submission to IACHR, June 2015, above n. 12.

²⁰ Submission to IACHR, June 2015, above n. 12; Amnesty International Letter re Medical Treatment, above n. 12, p. 3.

²¹ Amnesty International Letter re Medical Treatment, above n. 12, p. 4.

²² Defense Emergency Motion, above n. 5, p. 9.

²³ See for example, UN Standard Minimum Rules for the Treatment of Prisoners (the Mandela Rules), UN Doc. A/RES/70/175, 17 December 2015. Available at: http://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/70/175.

²⁴ Defense Emergency Motion, above n. 5.

²⁵ Appendix 5, Military Commissions Trial Judiciary: Guantanamo Bay, *USA v Khalid Shaykh Mohammad et. al.*, AE 332C, Order: Defence Motion for Medical Intervention, 10 March 2015, para 5.

- iii. Adopt the necessary measures to ensure access to medical care and treatment; and
 - iv. Report on the actions taken to investigate the presumed facts that led to the adoption of the precautionary measures in order to avoid the repetition of the alleged circumstances.²⁶
15. To date, the military legal team has not received any response from the U.S. Government in relation to the precautionary measures. Mr. al-Hawsawi's military legal team have not seen any improvement in his conditions of confinement and access to and standard of medical care, Instead, his medical situation deteriorated significantly in recent months.²⁷

V. **Conclusion and request for urgent action**

16. Next month will mark the thirteenth year of Mr. al-Hawsawi's detention by the U.S. Government. For three and a half of these years Mr. al-Hawsawi was subjected to enforced disappearance and was held in constant solitary confinement and incommunicado detention - itself a form of ill-treatment. During this time Mr. al-Hawsawi did not have access to a lawyer or to independent observers and was subjected to torture and ill-treatment which resulted in the various medical conditions outlined in this submission. Since acknowledging his detention at Guantánamo Bay in 2006, the U.S. Government continues to violate its obligations under international law in relation to Mr. al-Hawsawi, including the obligation to ensure that the victim of an act of torture obtains redress, including "the means for as full rehabilitation as possible."²⁸
17. We urge you to inquire into this very serious matter and to call on the Government of the United States of America to provide prompt access to necessary medical care for Mr. al-Hawsawi. The following measures should be promptly provided so as to avoid further irreparable harm to Mr. al-Hawsawi:
- An independent medical examination;
 - Surgery to remedy the rectal prolapse Mr. al-Hawsawi has suffered from since his secret detention in the CIA RDI Programme;
 - Tests to determine the underlying condition causing blood in Mr. al-Hawsawi's urine;
 - Effective treatment for Hepatitis C and follow up; and
 - Access to Mr. al-Hawsawi's medical records for Mr. al-Hawsawi and his military legal team.

²⁶ Inter-American Commission on Human Rights, Resolution 24/2015, Precautionary Measure No. 422-14, *Matter of Mustafa Adam Al-Hawsawi regarding the United States of America*, July 7, 2015. Available at: <http://www.redress.org/downloads/resolution-24-2015---precautionary-measures-al-hawsawi.pdf>.

²⁷ Request for Individual Complaint Hearing, above n. 4.

²⁸ See for example, UN Convention against Torture, Article 14; UN Committee against Torture, General Comment No. 3, *Implementation of article 14 by States parties*, CAT/C/GC/3, 13 December 2012.

Background on the circumstances of Mr. al-Hawsawi's arrest, detention and torture

18. Information about Mr. al-Hawsawi's secret detention prior to his arrival at Guantánamo Bay in 2006 has been carefully guarded.²⁹ Mr. al-Hawsawi and his military counsel have been precluded by a highly restrictive classification regime from speaking publicly about his rendition, detention, torture and ill-treatment, as any information from Mr. al-Hawsawi (and therefore his military counsel) on these matters is automatically classified, accessible only to those with high-level security clearance.³⁰ The continued failure of the U.S. authorities to conduct an effective investigation into allegations regarding Mr. al-Hawsawi's detention and ill-treatment means that the exact circumstances of his arrest and prolonged detention, as well as the extent of the torture and ill-treatment he was subjected to, have yet to be established.
19. However, a number of public sources have become available through government disclosures, court cases in various jurisdictions, investigative journalism, parliamentary inquiries, and comprehensive research. In 2014, the U.S. Senate Select Committee on Intelligence published a heavily redacted version of the executive summary of the Committee's Study of the Central Intelligence Agency's Detention and Interrogation Program which included additional information on Mr al-Hawsawi's arrest, detention, torture and ill-treatment.³¹

Arrest and detention

20. Since 2003, Mr. al-Hawsawi has been detained by the U.S. with the assistance of a number of other governments on whose territories he was held in secret detention between 2003 and 2006.³² Due to the classification restrictions imposed by the U.S. Government it is not possible to identify with certainty each of the locations in which Mr. al-Hawsawi was held - or transferred through - during this period, however, a number of locations identified in relevant documents, and supported by analysis of available data, include detention facilities in Pakistan, Afghanistan, Lithuania, Morocco, Poland and Guantánamo Bay.³³

²⁹ See for example, United Nations, "Report of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism, Ben Emmerson: Framework Principles for securing the accountability of public officials for gross or systematic human rights violations committed in the context of State counter-terrorism initiatives", A/HRC/22/52, 1 March 2013, para. 19.

³⁰ Military Commissions Trial Judiciary: Guantanamo Bay, *USA v Khalid Shaikh Mohammad et. al.*, AE 013BBBB, Third Amended Protective Order #1, To Protect against Disclosure of National Security Information, 6 July 2015. *See also*, United Nations, "Communication addressed to the United States of America by the Chair-Rapporteur of the Working Group on Arbitrary Detention; Special Rapporteur on the independence of judges and lawyers; Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism; and Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment", USA 31/2012, 30 November 2012, pp. 1-2; UN Working Group on Arbitrary Detention (WGAD), Communication addressed to the Government of the United States of America on 25 August 2014 and to the Government of Cuba on 15 September 2014, Concerning Mustafa al Hawsawi, UN Doc. A/HRC/WGAD/2014, 23 January 2015 ("WGAD decision re al-Hawsawi").

³¹ SSCI Summary, above n. 3.

³² Appendix 6, Department of Defense, Joint Task Force Guantanamo, JTF-GTMO Detainee Assessment, Mustafa al-Hawsawi, 8 December 2006 (JTF-GTMO Detainee Assessment), p. 4; SSCI Summary, above n. 3, Appendix 2 - CIA Detainees from 2002-2008, indicates the date of entry into CIA Custody (year remains unredacted), p. 459.

³³ See for instance, JTF-GTMO Detainee Assessment, above n. 32, p. 4; International Committee of the Red Cross (ICRC), "Report on the Treatment of Fourteen 'High Value Detainees' in CIA Custody", February 2007, ("ICRC HVDs Report"), p. 7; SSCI Summary, above, n. 3, p. 154, Amnesty International, *Breaking the Conspiracy of Silence: USA's European 'Partners in Crime' Must Act after Senate Torture Report*, 2015; Reprieve, *Briefing and Dossier for the Lithuanian Prosecutor General: CIA Detention in Lithuania and the Senate Intelligence Committee Report*, 11 January 2015, para 18; Amnesty International, *USA Crimes and Impunity: Full Senate Committee Report on CIA Secret Detentions Must be Released and Accountability for Crimes under International Law Ensured*, April 2015; Associated Press, *Secret Jails: Terror suspect's odyssey through CIA's Black Sites*, 2010, at <http://hosted.ap.org/specials/interactives/wdc/binalshibh/content.swf>; Adam Goldman, Associated Press, 'CIA Flight Carried Secret from Gitmo' (7 August 2010), at http://www.boston.com/news/nation/washington/articles/2010/08/07/ap_exclusive_cia_flight_carried_secret_from_gitmo/.

21. Since September 2006, when the U.S. Government finally acknowledged his detention, Mr. al-Hawsawi has been detained in a secret site in Guantánamo Bay, whose exact location is classified.³⁴ The UN Working Group on Arbitrary Detention has held that Mr. al-Hawsawi's ongoing deprivation of liberty is arbitrary and in contravention of articles 9 and 10 of the Universal Declaration of Human Rights and 9 and 14 of the International Covenant on Civil and Political Rights (ICCPR).³⁵

Methods of torture and ill-treatment used

22. A number of specific instances of torture and ill-treatment which Mr. al-Hawsawi was subjected to are identified in the SSCI Summary. Furthermore, public information, including declassified Governmental documents, has identified a range of abuses, in particular so-called enhanced interrogation techniques, which so-called High Value Detainees (HVDs), including Mr. al-Hawsawi, were subjected to.³⁶

23. Investigations into the RDI Programme have noted that the conditions of detention under which so-called HVDs were held, particularly during the earlier period of their detention, formed an integral part of the interrogation process, as well as an integral part of the overall treatment to which they were subjected as part of the CIA detention program.³⁷ The SSCI Summary findings and conclusions identified that prior to mid-2004, the CIA routinely subjected detainees to nudity and dietary manipulation.³⁸ At DETENTION SITE COBALT, where Mr. al-Hawsawi was detained for a period during his secret detention,³⁹ CIA detainees “were kept in complete darkness and constantly shackled in isolated cells with loud noise or music and only a bucket to use for human waste.”⁴⁰ The conditions were so bad that a “senior CIA officer stated that COBALT was itself an enhanced interrogation technique.”⁴¹

24. So-called “enhanced interrogation techniques” included the attention grasp, walling, the facial hold, the facial slap (insult slap), cramped confinement, wall standing, stress positions, sleep deprivation, the use of insects, and the waterboard.⁴² The SSCI Summary's Appendix listing “CIA Detainees from 2002-2008” confirms that Mr. al-Hawsawi was subjected to enhanced interrogation techniques while detained.⁴³

25. The SSCI Summary identified that Mr al-Hawsawi was one of 17 detainees “subjected to techniques without the approval of CIA Headquarters”.⁴⁴ The Summary indicates that he was subjected to water dousing (treatment described as “indistinguishable from the waterboard”⁴⁵) and suggests that he was subjected to sleep

³⁴ The White House, “President Discusses Creation of Military Commissions to Try Suspected Terrorist”, The White House Archive website, 6 September 2006, at <http://georgewbush-whitehouse.archives.gov/news/releases/2006/09/20060906-3.html>.

³⁵ WGAD decision re al-Hawsawi, above. N. 30.

³⁶ See for example, Amnesty International, *USA Crimes and Impunity: Full Senate Committee Report on CIA Secret Detentions Must be Released and Accountability for Crimes under International Law Ensured*, April 2015; Human Rights Watch, *No More Excuses: A Roadmap to Justice for CIA Torture*, 2015.

³⁷ ICRC HVDs Report, above n. 34, p. 19.

³⁸ United States Senate Select Committee on Intelligence, *Committee Study of the Central Intelligence Agency's Detention and Interrogation Program, Findings and Conclusions*, December 3, 2014 (SSCI Findings and Conclusions), p. 12.

³⁹ SSCI Summary, above n. 3, pp. 100 and 106.

⁴⁰ SSCI Findings and Conclusions, above n. 42, p. 4.

⁴¹ *Ibid.*, p. 4.

⁴² See for example, SSCI Summary, above n. 3, p. 37 and p. 63; ECtHR, *Al Nashiri v. Poland*, App. No. 28761/11, 24 July 2014, paras 53-61; Human Rights Watch, *No More Excuses: A Roadmap to Justice for CIA Torture*, 2015, pp. 11-14; ICRC HVDs Report, above n. 33.

⁴³ SSCI Summary, above n. 3, p. 459 (Names identified in bold were subjected to Enhanced Interrogation Techniques).

⁴⁴ *Ibid.*, p. 102-103.

⁴⁵ *Ibid.*, p. 106.

deprivation.⁴⁶ Furthermore, as noted above, Mr. al-Hawsawi was also subjected to sexual violence in the form of rectal exams conducted with excessive force.⁴⁷

List of Appendices [submitted separately due to volume]:

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- Appendix 2: Military Commissions Trial Judiciary: Guantanamo Bay, *USA v Khalid Shaykh Mohammad et. al.*, AE 332 (MAH), Defense Emergency Motion for Appropriate Medical Intervention and Return of Legal Files, 15 December 2014
- Appendix 3: Submission to Inter-American Commission on Human Rights, Mustafa Adam al-Hawsawi, Request for Information no. MC-422-14, United State, 5 June 2015
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- Appendix 6: Department of Defense, Joint Task Force Guantanamo, JTF-GTMO Detainee Assessment, Mustafa al-Hawsawi, 8 December 2006

⁴⁶ *Ibid*, p. 134, fn 796

⁴⁷ *Ibid*, p. 100, fn 584.