

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

HUZAIFA PARHAT,	:	
	:	
Petitioner,	:	
	:	
v.	:	No. 06-1397
	:	
ROBERT M. GATES,	:	
	:	
Respondent.	:	

DECLARATION OF J. WELLS DIXON

I, J. WELLS DIXON, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at the Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, New York 10012. I am co-counsel for the 17 Uighur prisoners detained at the U.S. Naval Station at Guantánamo Bay, Cuba, including Huzaiifa Parhat.
2. I met with the Uighurs twice during the week of October 6, 2008. I met with them in Camp Iguana, the prison camp where they are held without charge at Guantánamo. The information contained in the following paragraphs is based on my personal knowledge, my discussions with the Uighurs, and my observations of Camp Iguana.

3. The Uighurs continue to be held as prisoners at Guantánamo, despite the fact that the government has conceded none of them is an enemy combatant.

4. At Camp Iguana, the men appear to remain completely isolated from everyone except their jailors and their lawyers, and perhaps an occasional visit from a representative of the International Committee of the Red Cross. I am informed and believe that they have no telephone or other direct access to the outside world. The men are not permitted to leave Camp Iguana. They are not granted even supervised excursions outside of Camp Iguana.

5. The Uighurs do not have meaningful access to news or information about their families. For example, I am informed and believe that my co-counsel at the law firm of Kramer Levin Naftalis & Frankel LLP submitted for clearance on behalf of one of our Uighur clients a family letter (with an English translation) and eight photographs of our client's children on September 19, 2008. As of the time of my meetings with the Uighurs last week, the letter and photographs had not been cleared or delivered to our client. Nor to my current knowledge has the military responded to my written inquiry last week concerning the clearance status of these materials.

6. Although the Uighurs are free to move about inside Camp Iguana, they are still detained in a high security prison controlled by Joint Task Force Guantánamo ("JTF-GTMO"), the command that operates all areas of the

Guantánamo prison. The Uighurs are surrounded by fences and razor wire. When I met with the Uighurs, I was separated from them by a fence and could not shake their hands or walk among them. The men are also bounded on one side by an endless ocean that they can see but cannot touch; and on the other sides by fences covered in green mesh preventing any meaningful view outside the prison walls. Military guards with rifles patrol the prison, and the men are monitored by cameras 24-hours a day.

7. Three huts take up much of the physical space at Camp Iguana, leaving a small area as the only space for physical recreation.

8. I observed that the guards do not refer to the Uighurs by name, but rather by ISN. The guards keep their own name tags covered with tape.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: New York, New York
October 15, 2008



J. Wells Dixon